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Friday, June 20, 2014

Darren Hicks
Environmental Analyst
Canada-Newfoundland and Labrador Offshore Petroleum Board
140 Water Street, 5th Floor, TD Place
St. John's, NL A1C 6H6

Re: Multi Klient Invest AS Southern Grand Banks Seismic Program

Hi Darren,

The FFAW-Unifor has gone through the responses provided by Multi Klient Invest AS, to the comments provided to the Environmental Assessment (EA) for the proposed Southern Grand Banks Seismic Program.

Looking at responses to the general comments: FFAW-Unifor indicated that there had to be a direct indication of what fisheries science work was being referred to with the 7-day temporal separation. The Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab is not a unilateral DFO survey. For example the Fall DFO RV trawl survey is managed wholly by DFO and is conducted by a limited number of vessels, which allows for it to suggest a 7-day temporal separation in that instance.

It appears that there is no response to the FFAW-Unifor comment with regards to section 5.6.3.1 on page 154 of the EA

FFAW-Unifor's comment on Section 5.8.5.2: In the initial comments to the EA it was adamantly indicated by the reviewer that any mention of a 7-day temporal separation needed to specify what science work was in question. As the proponent is well aware the 7-day temporal separation pre crab survey is unfeasible in the context of what is considered to be active fishing grounds. The harvesters engaged in the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab cannot undertake scientific and commercial activity concurrently and the scientific licenses for the survey are not issued until around September 1st.

The FFAW-Unifor continues to be available for consultations between the proponent and fishing industry.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison