
FISH, FOOD AND
ALLIED WORKERS

EARLE MCCURDY
PRESIDENT

P.O. BOX 10, 368 HAMILTON AVE. ST.
JOHN'S NL A1C 5H5
TELEPHONE (709) 576-7276
TELEFAX (709) 576-1521
WWW.FFAW.NF.CA

DAVID DECKER
SECRETARY-TREASURER

Friday, August 30, 2013

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

Mr. Hicks,

The Fish, Food and Allied Workers Union (FFAW) would like to respectfully submit the following comments in connection with the Scoping and Project Description Documents for the Nalcor Energy: Oil and Gas – **Geochemical Data Acquisition and Seabed Sampling for Basin Modelling in Labrador Offshore (2013 to 2018)**. The FFAW engages in reviews and consultations with the Petroleum Industry on behalf of our far-reaching membership throughout the province of Newfoundland and Labrador.

The FFAW wants to indicate that it has expertise to engage in the Environmental Assessment process. The contact within the FFAW would be the Petroleum Industry Liaison (Johan Joensen, [REDACTED]) who would further source the expertise of the pertinent sections of the membership of the organization. This expertise relates to the consultation processes and also experienced knowledge of the marine environment in which the petroleum industry is currently operating.

The Project Description for the program is limited in scope as all that is included is some sampling for 2013, all of which is looking to take place off the Labrador coast. However, the timeframe for this Environmental Assessment is 2013-2018. Further to this, the title provided with the Project Description is not appropriate when compared with the Multi-year Study/Project Area presented on page 2 of the document, seeing that the area covered entails the Labrador Sea, Newfoundland Northeast Slope, Northern Grand Banks, Flemish Pass, Flemish Cap and more besides. It is also strongly suggested that the section on Environmental Setting include the Industry-DFO Post-Season Trap Survey for Snow Crab, and not only the DFO Research Vessel fall surveys.

As for the Scoping Document section 3.1 the second last word should be each or any instead of either. Section 5.1.2 on temporal boundaries should include both timing of sensitive life cycles and other activities taking place in the area. Section 5.2.9 on fisheries and other ocean users should include the research pertaining to the health of fish stocks in the area. Additionally section 5.2.9 needs to include information on the fisheries pre-moratoria as there are significant environmental changes observed; indicating that the marine environment is changing back towards what it was pre-moratoria.

The FFAW has already been engaged by Nalcor Energy: Oil and Gas in discussions pertaining to the Project Description and the Scoping Document. We are looking forward to continue to be engaged by

the proponent and the Canada-Newfoundland and Labrador Offshore Petroleum Board with regards to this forthcoming Environmental Assessment.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison