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DAVID DECKER  
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Tuesday, June 25, 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,

Having reviewed to responses to the comments that the FFAW submitted to the C-NLOPB regarding Chevron Canada Limited's Environmental Assessment Validation documents, I respectfully provide the below follow up observations.

Although there were multiple responses from the proponent that inaccuracies pointed out did not cause a material change to the validation document. By virtue of there being several of these inconsistencies within the document, it is an indication that the proponent did not take their due diligence in ensuring the quality of the work submitted to the C-NLOPB. The fact that a proponent qualifies their responses by indicating no material change to the validation document also indicates a disregard to the process which is in place for such documents in Newfoundland & Labrador.

The response to the comment on consultation and FLO approach/discussion indicates that there was in fact a full consultation on what was to take place. The FFAW received two emails from the contractor preparing the EA Validation document. Due to the number of documents that go through the Petroleum Industry Liaison for review, it should be incumbent upon the proponents to seek proper consultation, rather than upon request from the FFAW. What in the validation document then is referred to consultation is hence rather limited.

In the context of the reporting of an incident taking place, it would have been appropriate for the proponent to state in the submitted document that reporting would be immediately, rather than "timely fashion" which was used. Clarity has a much greater impact and relevance when it comes to possible incidents of damaged fishing gear or other possible accidents.

Yours truly,

Jóhan Joensen  
Petroleum Industry Liaison