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Mr. Hicks

The Fish, Food and Allied Workers Union (FFAW) would like to respectfully submit the following in connection with the Scoping and Project Description Documents for the Suncor Energy **2D/2D/4D Seismic Program (2014-2024) Eastern Newfoundland Offshore Area**. 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 lead contact within the FFAW would be the Petroleum Industry Liaison (Johan Joensen), who would further source the expertise of the pertinent sections of the membership of the organization. This expertise relates to the consultations processes and also experienced knowledge of the marine environment in which the petroleum industry is currently operating.

Within the Project Description provided for this program, there is an inclusion in the document of the coordinates of the extents of the Study Area (page 6 of 15). This does not directly relate to the polygon presented on page 3 of 15.

In the context of section **6.4.1 Commercial Fisheries** of the Project Description it is suggested that the "commercial fisheries will be described in the EA based on latest available DFO catch landings data." It is important to note that in the Scoping Document 5.2.9 "Consideration of underutilized species and species under moratoria that have been found in the Study Area as determined by analyses of past DFO research surveys and Industry GEAC survey data, with emphasis on those species being considered for future potential fishers, and species under moratoria; traditional historical fishing activity, including abundance data for certain species in this area, **prior to the severe decline** (emphasis added) of many fish species (e.g., a general overview of survey results and fishing patterns in the survey areas for the last 20 years". It is worth noting that for there to be a picture of the pre-moratoria context it has to go back further than 20 years.

It is of utmost importance that the proponent diligently pursues the consultation process with all other ocean users. This is of importance as parts of this program will have activity close to and within various fishing areas. The Petroleum Industry Liaison with the FFAW is available to assist in arranging consultation sessions specifically aimed at those active within the fishing industry. The FFAW is looking forward to seeing the completed Environmental Assessment for this proposed activity.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison