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Darren Hicks
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Canada-Newfoundland and Labrador Offshore Petroleum Board
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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 TGS-NOPEC Geophysical Company ASA (TGS) **Offshore Labrador Seafloor and Seep Sampling Program 2014-2019**. 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 the expertise to engage in the Environmental Assessment process. The lead contact within the FFAW would be the Petroleum Industry Liaison (Jóhan Joensen), 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.

Having reviewed the Scoping Document and the Project Description, the FFAW has the following quick observations:

- Within the Scoping Document, the Industry-DFO Collaborative Post Season Trap Survey for Snow Crab should be mentioned.
- It is worthwhile to bring up that the proposed activity is likely to take place in active fishing areas but there is no mention of the utilization of a Fisheries Liaison Officer. This should probably have been raised in 2.7 as continued consultation on the location of harvesting activity during the survey program.
- The second paragraph of section 3 of the Project Description appears to suggest that the frequency of icebergs particularly occur in the region near the Grand Banks. It is uncertain if this emphasis is warranted, as icebergs are likely in most of the Study Area.
- Page 8 of the Project Description suggests that the Study Area from the northern point of Labrador to the Flemish Cap is a single ecosystem. Looking at the fisheries science information available, it is uncertain that this is an accurate description. Further to this, the second last paragraph again warrants to have mention of the Industry-DFO Collaborative Post Season Trap Survey for Snow Crab.

It is of utmost importance that the proponent diligently pursues the consultation process with all other ocean users. This is especially of importance as this program will have the seismic vessel operating close

to and within various 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.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison