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Mr. Hicks

The Fish, Food and Allied Workers Union (FFAW-Unifor) would like to respectfully submit the following comments in connection with the Scoping and Project Description Documents for the WesternGeco Canada **Eastern Newfoundland Offshore Seismic Program, 2015-24**. FFAW-Unifor engages in reviews and consultations with the Petroleum Industry on behalf of our far-reaching membership throughout the province of Newfoundland and Labrador.

FFAW-Unifor wants to indicate that It has the expertise to engage in the Environmental Assessment process. The lead contact within FFAW-Unifor 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, FFAW-Unifor has the following quick observations:

- The Project Area is of such a size that it covers a multitude of harvesting activities throughout a calendar year, this is in addition to the sensitive life cycles of the species found in this area.
- FFAW-Unifor would like to emphasise that the crew on the picket vessel have to be well informed on the operational procedures in Newfoundland and Labrador waters.
- When it comes to the temporal scope of the work being proposed, FFAW-Unifor emphasises the importance of avoiding the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab and this needs to be specifically listed in the Scoping Document. This would entail avoidance until the stations have been completed.
- 4.2 of the Scoping Document could include qualification of any change or impact that the project could have on existing commercial activities in the area.
- The Project Description suggests that more than half of the program will be outside of the Canadian EEZ. This would suggest that the proponent knows all areas to be acquired. It would be a fair statement in the context of the whole Project Area or even the 2015 2D Survey Area. Whether the Project Area is located inside or outside

the Canadian EEZ should be of minor importance as it is evident that it falls under the jurisdiction of the C-NLOPB.

- On page 5 of the Project Description, the area under consideration for 3-D in 2015 is indicated to be 86,813 Km<sup>2</sup>. On page 7 the 3-D program for 2015 is indicated as 10,000Km<sup>2</sup>. As a Project Description there has to be consistency in what is being proposed to take place.

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 within very active harvesting areas. The Petroleum Industry Liaison with FFAW-Unifor is available to assist in arranging consultation sessions specifically aimed at those active within the fishing industry.

Yours truly,

Jóhan Joensen

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