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Thursday, January 21, 2016

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

Mr. Hicks,

Re: Environmental Assessment of WesternGeco's Southeastern Newfoundland Offshore Seismic Program, 2015-2024 Addendum

Thank you for providing the Fish, Food and Allied Workers (FFAW-UNIFOR) with the opportunity to comment on the Environmental Assessment for WesternGeco Southeastern Newfoundland Offshore Seismic Program, 2015-2024 Addendum.

FFAW-Unifor represents a far-reaching membership across Newfoundland and Labrador. We are pleased to engage in reviews and consultations with the Petroleum Industry on their behalf. At our initial consultation meeting with WesternGeco in January 2015 we advised the company that fish harvesters are interested in being more engaged and directly involved in the consultation process for project-specific Environmental Assessments. We thank WesternGeco for presenting at a number of our fleet meetings in December as these fleets consist of harvesters who could be affected over a long period of time given the project covers a large project area.

Additionally, we thank WesternGeco for their response to our comments on the original EA submission. Further, there are still a few comments in the document that FFAW-Unifor would like to comment on:

p. 49 – While we respect the DFO SAR referenced, we reiterate that the observations of harvesters do not indicate a decline in the snow crab resource in 3LNO.

p. 181 – The 7 day temporal buffer is **NOT** an acceptable mitigation for fisheries or fisheries science in the view of the FFAW-Unifor. In relation to the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab, the 7 day temporal separation is not an acceptable protocol. Furthermore, this perspective is shared by our scientific partners at Fisheries and Oceans Canada. It is our stance that seismic work should **NOT** be conducted in the vicinity of survey stations.

Consultation remains paramount if seismic and fish harvesting are to harmoniously exist. As the project covers a large project area for a ten year period, probability is high that there will be seismic vessels operating within active harvesting areas throughout this time. The Petroleum Industry Liaison with FFAW-Unifor is available to aide in further consultation with the fishing industry as required.

Thank you for the opportunity to provide input on this Addendum.

Kind regards,

Projects Coordinator/Petroleum Industry Liaison