



November 12, 2025

C-NLOER  
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The Tower Corporate Campus – West Campus Hall  
Suite 7100 St. John's, NL A1E 1E2

Cc: Melissa Moss  
Honourable Chris Tibbs, Minister of Environment, Conservation, and Climate Change  
Honourable Loyola O'Driscoll, Minister of Fisheries and Aquaculture  
Honourable Lloyd Parrott, Minister of Energy and Mines

**RE: FFAW-Unifor Comments on MKI Environmental Assessment Report –  
Newfoundland Offshore Seismic and Environmental Data Collection Program,  
2026–2030**

Ms. Moss,

On behalf of the Fish, Food and Allied Workers Union (FFAW-Unifor), representing over 14,000 working men and women in Newfoundland and Labrador's fishing industry, we submit the following comments regarding the Environmental Assessment of Multiklient Invest's Newfoundland Offshore Seismic and Environmental Data Collection Program, 2026–2030.

FFAW-Unifor remains concerned about the **long-term effects of seismic activity on commercially important species**, which are not fully understood. While seismic exploration has occurred in Newfoundland and Labrador waters for decades, knowledge gaps persist regarding repeated exposure over multiple years and its cumulative effects on commercial populations. Recent research highlights measurable short-term impacts on groundfish and crab species, though these results remain inconclusive. Further study is recommended, particularly regarding impacts across life-history stages (females, eggs, larvae), biomass densities, and prolonged exposure. Fish harvesters, as traditional ocean users, continue to report real-time behavioral responses of commercial species to seismic activity, including altered cod foraging and movement patterns, turbot migration away from activity zones, and stationary behavior in witch flounder. These observations, combined with emerging scientific evidence, demonstrate the urgent need for expanded research on both short- and long-term ecological effects.

The proposed seismic area overlaps with multiple inshore and nearshore fisheries critical to NL's coastal communities. Harvesters participate in snow crab, shrimp, turbot, cod, and capelin fisheries, each with distinct seasonal patterns that may coincide with seismic activity. Snow crab is generally harvested from late spring through summer into early fall; turbot and cod fisheries primarily operate during summer and fall; shrimp fisheries follow

an April-to-March management cycle with seasonal concentration; and capelin fisheries occur during short, localized openings in early to mid-summer. These fisheries are dynamic, with timing and effort varying annually based on DFO management decisions and environmental conditions. Careful planning of seismic activities is essential to avoid conflicts with peak harvesting periods and ongoing fishing operations and ongoing efforts to engage are expected.

Seismic operations present potential conflicts with fixed gear, including crab pots, gillnets, and longlines. FFAW-Unifor emphasizes that DFO–industry post-season surveys, including the collaborative crab survey, must not be interfered with, as these are essential for stock assessment and quota-setting. Early and ongoing communication between MKI, C-NLOER, and FFAW-Unifor is essential to prevent operational conflicts and ensure survey integrity and safe fishing operations.

FFAW-Unifor recommends **site-specific consultations with affected fish harvesters**, including those from multiple regions who fish in offshore zones. Accurate mapping of NAFO fishing areas, species specific management areas and the project spatial scope should be superimposed to ensure EA planning reflects operational realities and avoids conflicts with fishing activity.

We encourage the proponent to contribute to **expanded research programs** addressing knowledge gaps on long-term impacts, life-history stages, species displacement, breeding behavior, and cumulative exposure. Collaborative research with harvesters, government, and academic partners will support precautionary management and sustainable decision-making.

Seismic activity in Newfoundland and Labrador’s offshore has occurred for decades, yet important uncertainties remain regarding its long-term ecological and fishery impacts. Harvesters’ observations and emerging scientific evidence make clear that precaution, transparency, and respect for fisheries must guide this process. FFAW-Unifor urges that the finalized EA Report reflect these concerns and that MKI, in coordination with C-NLOER, demonstrate how identified risks, knowledge gaps, and operational conflicts will be mitigated. Without such commitments, this program risks disrupting fisheries and undermining public confidence in offshore resource management.

Kind Regards,

*Original Signed by*

Dwan Street  
President, FFAW-Unifor