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**KEITH SULLIVAN**  
President

**DAVID DECKER**  
Secretary-Treasurer

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Monday, July 31, 2017

Darren Hicks  
Environmental Analyst  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
140 Water Street, 5<sup>th</sup> Floor, TD Place  
St. John's, NL A1C 6H6

**Re: Fugro Offshore Seafloor and Seep Sampling Program (2017-2027)  
Environmental Assessment**

Dear Mr. Hicks,

Thank you for providing the Fish, Food and Allied Workers' Union (FFAW/Unifor) with the opportunity to comment on the Environmental Assessment of Fugro's Offshore Seafloor and Seep Sampling Program (2017-2027). Our comments are focused on a few aspects of the document that are representative of issues and concerns from the fishing industry, namely the members of FFAW/Unifor.

The overall study area for this EA is quite large as is the temporal scale of the project (2017-2027). While fisheries data has been examined in the document it needs to be recognized by the proponent that there is a regime shift happening (from a shellfish dominated to groundfish dominated fishery) in our dynamic marine environment. Our fisheries will likely change over the span of this ten year project. Our fisheries science work is likely to change as well. *It is critical that effective and regular communication ensue with the fishing industry, as committed in the EA, throughout the EA lifespan so that the proponent is kept apprised of ongoing developments with fisheries in the vast project area.*

Page 9 – Interference with fishing activities – The table should read “there will be a FLO onboard the vessel”.

It is paramount that Fugro ensures that the equipment used for seabed sampling is safely secured. Failure to do so and losing the equipment would result in a hazard for fishing vessel towing gear on the seabed. This issue does not appear to be addressed fully in the document.

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FFAW/Unifor would like to thank you for providing an opportunity to comment on this EA. If you have any questions or comments please feel free to contact the undersigned.

Kind regards,

Robyn Lee  
Petroleum Industry Liaison

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