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Thursday, July 6, 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: Amendment of MKI's Environmental Assessment of the Northeast Newfoundland Slope 2-D Seismic Survey Programme 2012-2017**

Dear Mr. Hicks,

Thank you for providing the Fish, Food and Allied Workers' Union (FFAW/Unifor) with the opportunity to comment on the Amendment of MKI's Environmental Assessment of the Northeast Slope 2-D Seismic Survey Programme, 2012-2017.

*Our concern is not with respect to the amendment's addition of a third 3D seismic vessel as the different areas designated for each seismic vessel in 2017 are distinct.*

We do have **grave** concerns however regarding the **timing** of seismic data acquisition of two of the planned programs this year – Harbour Deep and Cape Broyle.

To begin, there **will be** active commercial snow crab fishing in NAFO Divisions 3L and 3N during the month of July, when the company plans to start seismic work in Harbour Deep and Cape Broyle. The commercial crab quota has not been caught to date in these areas and we anticipate fishing activity to remain active in these areas until the end of the month.

Additionally, the members of FFAW/Unifor have ongoing concerns with seismic activity being conducted in the vicinity of post-season crab survey stations prior to the stations being sampled for the year. The collaborative DFO-industry post season crab survey starts in September and continues until November. MKI's schedule of 3D seismic work in the Harbour Deep (mid-July to mid-October) and Cape Broyle (mid-July to end of August) prospects will not allow for the DFO-

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industry post-season crab survey to be executed without interference from seismic activity.

This post-season crab survey is vital to the fishing industry as it informs decision making with regards to quotas for coming years. Our members rely on this survey to be completed each year, without interruption or potential effects from outside variables. To date this survey has occurred uninterrupted by seismic or other oil and gas activity, allowing confidence in the index and time series. The current proposed activity by MKI poses to throw an unknown into the data as we are currently unsure of the effect of seismic activity on snow crab catchability, behaviour and physiology. It also threatens the time series of what has been a longstanding collaborative index between fish harvesters and science. Any potential impact on the survey will have significant consequences for the crab fleets – be it either short or long term.

The collaborative DFO-industry post season crab survey is undergoing changes in terms of the location and number of survey stations. Changes have not been confirmed for 2017. While this is frustrating for planning all around it continues to be FFAW/Unifor's position that seismic work should **NOT** be conducted in the vicinity of survey stations until they have been sampled for the year. We have been consistent in this position with all seismic activity and remain steadfast in our stance. This is an important time series.

*In the past, we have worked cooperatively with MKI on this issue and anticipate the same level of understanding going forward.* We must ensure our members' concerns are heard and addressed, and we must also ensure that the importance of both the fishery and the post season industry collaborative snow crab survey are recognized across each of our industries.

It should also be noted that FFAW/Unifor only became aware of the timing of the planned seismic programs for Harbour Deep and Cape Broyle within the past month. (The Harbour Deep prospect has also not been mentioned in previous EA updates for 2017). This is not an acceptable time frame as our initial awareness of these programs falls in the middle of what is the busiest fishing season, not allowing consultation with our membership nor a sufficient amount of time for our members concerns and viewpoints to be properly voiced.

FFAW/Unifor would like to thank you for providing an opportunity to comment on this EA Amendment. 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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