
KEITH SULLIVAN
President

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Friday, July 28, 2017

Darren Hicks
Environmental Analyst
Canada-Newfoundland and Labrador Offshore Petroleum Board
140 Water Street, 5th 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: MKI's Response to Reviewers Comments

Dear Mr. Hicks,

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

The fishery remains open in 3LNO until 2000 hours on Monday, August 7th, 2017 following a one week extension by DFO. At the present time there is quota still available to be caught. We cannot support a move into an area of seismic interest that is also an open area for fishing until we have assurance that there will be no fishing activity in the area. *We will continue our regular dialogue with the proponent to mitigate potential issues that could easily arise should there be crab gear in the water or should a harvester move to the area before the end of the extended season.*

We reiterate our consistent stance that the 7 day/30 km temporal/spatial buffer is **NOT** an acceptable mitigation for the DFO/Industry post-season crab survey. The DFO/Industry post-season crab survey is not the same as other DFO scientific surveys. Our membership is **NOT** in support of seismic activity being conducted over these stations prior to them being sampled for the year. *We will continue our regular dialogue with the proponent to advise when survey stations have been sampled.*

The importance of both the fishery and the post season industry collaborative snow crab survey must be recognized across both industries.

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

Kind regards,

Robyn Lee
Petroleum Industry Liaison