

From: Robyn Lee <rlee@ffaw.ca>
Sent: Friday, November 19, 2021 4:08 PM
To: Hicks, Darren
Cc: Murphy, Ian
Subject: Re: MKI amendment to alter mitigation protocol

Hi Darren,

FFAW does not support MKI's amendment to remove a temporal/spatial avoidance protocol mitigation measure (7 day/30 km) with an intention to establish an alternate temporal and spatial separation plan in the future.

The research work conducted by Morris et al. (2021) focused on testing impacts of seismic sound on commercial snow crab. Commercial snow crab are terminally molted male crab. The study did not measure impacts on other life history stages of male crab or any effects on female crab as it focused on terminally molted male crab.

Our annual post-season crab study collects information on all life history stages of crab - animals available for recruitment in the next fishing season as well as smaller crab - recruits for the next several years and females.

To be clear, we do not know whether there are impacts of seismic on other life history stages of snow crab. We do know that it takes about 30-40 km for the noise of the seismic vessel itself to dissipate. We do not know what the added stress of a seismic survey has on other life history stages of crab.

Our membership remains concerned about how seismic surveying in the immediate vicinity of crab survey stations may impact the animals. If animals are not caught/sampled in the survey, for example, they are not considered in the assessment for future years. This could have far-reaching impacts on science and crab quotas for years to come.

We have worked cooperatively with MKI over the past few years to avoid post-season crab survey stations until they were sampled. We do recognize that the 7 day/30 km mitigation presents operational challenges for MKI, and other seismic companies. However, we are not supportive of the removal of a temporal/spatial avoidance protocol mitigation measure (7 day/30 km) with an intention to establish an alternate temporal and spatial separation plan. It is very unclear at this point in time what an alternate plan would be.

Kind regards,
Robyn

From: Hicks, Darren <DHicks@cnlopb.ca>
Sent: Monday, September 20, 2021 1:28 PM
To: Robyn Lee <rlee@ffaw.ca>
Cc: Murphy, Ian <IMurphy@cnlopb.ca>
Subject: MKI amendment to alter mitigation protocol

Good day Robyn: please see the response from MKI to FFAW's comments on their amendment to alter their mitigation protocol. The C-NLOPB requests that you review the enclosed and provide comments no later than October 4, 2021. If no response is received from you by the date indicated above, the C-NLOPB will assume that you have no comments. If you have any questions regarding the EA Amendment, you may contact me (709-778-1431 or dhicks@cnlopb.ca).

Regards
Darren

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