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Wednesday, April 26, 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: Polarcus UK Ltd Environmental Assessment Eastern Newfoundland
2D/3D/4D Seismic Survey Program 2016-2022**

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 Polarcus's Eastern Newfoundland's Seismic Survey Program 2016-2022. 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.

While fisheries data for the current principal commercial species (section 4.8.1 and page 5-6) were reviewed in the document there is no discussion regarding the regime shift (discussed at the most recent shrimp and crab assessments) that is currently underway in our dynamic marine environment. This shift was discussed for Atlantic cod at the industry consultation in February 2016 (page A-34). Increased fishing activity is anticipated for all groundfish species (e.g. Atlantic cod, turbot, Atlantic halibut, grey sole, redfish, yellowtail flounder, etc.) during the temporal scope of this EA. This is particularly relevant for the company when planning annual survey layouts and locations (section 5.6.1) *It is critical that effective and regular communication ensue with the fishing industry throughout the EA lifespan so that the seismic company is kept apprised of ongoing developments with fisheries in the project area.*

It is important to note that the Fisheries Liaison Officer is best placed on the seismic survey vessel, not the guard vessel (page 5-16), where s/he can work most effectively. *This is considered an industry best practice in the Newfoundland and Labrador region, as discussed on page 5-19.*

Note that VMS data is provided by Fisheries and Oceans Canada (page 5-17), not FFAW/Unifor. Please revise the text to reflect this. *It is recommended that the company consult with DFO on the availability of this information as discussed on page 2-2.*

Finally, it should be noted that the post-season crab survey is a collaborative program between DFO and FFAW/Unifor and as such should also involve communication with FFAW/Unifor (page 5-19). The survey is undergoing changes in terms of the location and number of survey stations. However, changes have not been confirmed for 2017. *It is therefore crucial that the seismic company maintain effective communication with FFAW/Unifor and DFO to receive accurate information on the post-season crab survey going forward.*

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
