

GENERAL COMMENTS

Fish, Food and Allied Workers (FFAW)

Original comment

In the context of avoidance of fishing grounds and areas in which the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab, the FFAW would reiterate as we have done with other projects, there should be no seismic activity in vicinity of either active fishing grounds or survey locations. With the lack of scientific evidence showing that seismic activity does not have an impact on the biological strata.

***Suncor Response:** Suncor commits to maintain regular communication with DFO, the FFAW, independent fishers, and managers of other key corporate fisheries in the area throughout survey operations. Seismic surveys will be scheduled, to the extent possible, to reduce potential for impact or interference with DFO science surveys or fishing activities.*

FFAW Reply

Fisheries are managed under the precautionary approach, the purpose being to ensure long-term sustainability. It is with respect to said precaution that FFAW-Unifor strongly opposes pursuing seismic activity on important active fishing grounds.

Although the personal communication from the DFO Scientist is not construed as official acceptance, it does indicate support for the FFAW-Unifor position in a precautionary context. As previously stated in various submissions by FFAW-Unifor to the C-NLOPB, the Post-Season Trap Survey for Snow Crab Stations are considered active fishing grounds until surveyed.

SPECIFIC COMMENTS

FFAW

Original comment

Section 4.3.3.1 1986 to 2010 Catch Trends, pg 54 – It is suggested that the demise of the groundfish fisheries was purely a result from exhaustive fishing effort. This is not a complete description, as there is strong science suggesting that a significant change of the environmental regime, which substantially impacted the recruitment and survivability of many of the groundfish species.

***Suncor Response:** All fish have physiological limits within which they can survive, such as sea temperatures and salinities (Rose 2005). Frank et al. (1990) analyzed the effects of changes in oceanographic conditions induced by a global increase in atmospheric CO₂ and their models predicted a general warming and freshening of the continental shelf waters, leading to shifts in the geographic distribution of important commercial groundfish stocks, earlier arrival times and later departures for highly migratory large pelagics, and – in combination with increased water column stratification – decreased organic material reaching the seabed. Rose (2005) inferred that capelin (*Mallotus villosus*) and herring (*Clupea harengus*) react strongly and quickly to climate change, owing to their physiological limits and potential for fast population growth; this was verified through the examination of historical data from Icelandic and Greenland waters, which warmed considerably during 1920 to 1940, resulting in capelin, herring, cod (*Gadus morhua*), and other species shifting north very quickly.*

FFAW Reply

The response does not address the reviewer's comment. Rather it appears that the response is a replacement of the original paragraph without relating it to the scientific knowledge of the local context.

Original comment

Section 4.3.7 Industry and DFO Science Surveys, pg 87 - It appears that the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab is a new project with a limited scope. In fact this survey has been ongoing for over a decade and involves the sampling of approximately 1,000 locations by almost 100 fishing vessels. In 2013 the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab, the locations in NAFO region 3L were completed between September 4th and September 25th. This survey provides significant input into the scientific advice of DFO when it comes to the establishment of quotas and recruitment estimates.

Addendum to the Environmental Assessment of Suncor Energy's Eastern Newfoundland Offshore Area 2D/3D/4D Seismic Program 2014-2024 (LGL May 2015)

Suncor Response: *Future EAs will avoid text that implies that the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab is a relatively new project, and will instead indicate the appropriate time frame referenced in the comment above.*

FFAW Reply

The current Environmental Assessment should also avoid said text as reference in the response. The comment was made in context of the current Environmental Assessment; hence the correction should apply to the current document.