
KEITH SULLIVAN
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Friday, July 17, 2015

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: Suncor Energy's Eastern Newfoundland Offshore Area 2D/3D/4D
Seismic Program, 2014-2024**

Dear Darren,

Having reviewed the response to our initial comments we have the below observations regarding the Environmental Assessment for Suncor Energy's Eastern Newfoundland Offshore Area 2D/3D/4D Seismic Program (2014-2024):

Reply to response to comment on pg. 54.

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.

Reply to response to comment on pg. 87:

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.

Reply to Response to comments relating to mitigations etc.:

FFAW-Unifor has yet to see any communication which would qualify the temporal separation as sufficient. The reviewer has not seen the discussed plan from 2002, but would be inclined to believe that it was not in relation to the Post-Season Trap Survey for Snow Crab which evaluates abundance. Rather the 2002 solution is one which would apply to DFO's Random Stratified Trawl Survey, which would have varying locations year to year. As

such, FFAW-Unifor recommends that proposed mitigations have to qualify the particular fisheries science context in which they apply.

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.

I would like to thank you for the opportunity to provide input on this environmental assessment. Please do not hesitate to contact me at any time if you require further information.

Sincerely,

Robyn Lee
Petroleum Industry Liaison
FFAW-Unifor
