Fish, Food and Allied Workers

Re: Response to A1: The proponent rationalizes a portion of their Environmental Assessment (EA) document with the comments made by the Premier of Newfoundland & Labrador. This although the comments made by the Premier were only made at the NOIA conference June 17th-20th, 2013. The EA however was submitted prior to this; it is not tenable to pre-date comments made by a politician to rationalize statements made in the context of hoped development. The Fish, Food and Allied Workers Union (FFAW) appreciates that there might be plan changes to what GX Technology is looking to pursue. However, it would be of benefit for the mitigation effort to present what plans at least are in place before they are changed. Full context is paramount when giving considerations to proposed activities in any context.

Re: Responses to A2: As the EA is a single document and a magazine is a collection of articles or stories, there is not quite the same context between the two. To rationalize that there are times that using the two letter shortform enhances either emphasis or greater clarity is questionable. One can just as easily move and say that the international two letter abbreviated code NL refers to the Netherlands.

Re: Responses to A3: For consistency one or the other and not both should be employed – in the opinion of the reviewer. This is particularly prudent in light of the many acronyms used in the document, of which not all were made clear in the first production of the EA document.

Re: Responses to A4: What the reviewer was pointing out was that it is indeed appropriate for the scientific name be provided with the first substantive reference to a particular species. However, this principle did not appear to be followed in the context of the EA document in question.

Re: Responses to A6: For the understanding and context of harvesters all factors pertinent for the consideration should be included in single figures. Disconnecting the proposed seismic survey lines, NAFO regions and harvest locations will only serve to limit the context for input from harvesters. This should be seen in the light of harvesters having expressed that all proponents need to overlay their proposed activities on appropriate nautical charts.

Re: Responses to A7: GX Technology aptly manages to reference its own document as a rationale for what temporal and spatial separation will be utilized. What remains is that GX Technology mentions temporal separation in the context of avoidance of a collaborative science effort. It would be prudent to discuss this with both participants in said science – as was indicated appropriate in FFAWs initial comment. Further, there is no addressing of providing a direct indication of which program had said seven day quiet time separation. As an equal partner in the Industry-DFO Collaborative Trap Survey for Snow Crab, the FFAW Science has at no point been either directly consulted or agreed to employ the mentioned temporal separation – this holds true for this program and any seismic program since the aforementioned Survey commenced.

Re: Responses to A8: Although Fisheries and Oceans Canada has not expressed any concern, it is evident that the FFAW has.

Nunatsiavut Government

The Nunatsiavut Government (NG) commends GXT for agreeing to hire and train an Inuit
Fisheries Liaison Officer and committing to target Labrador Inuit as full crew members on the *Polar Prince*. However in order for this to become a reality, Labrador Inuit will need to be trained and provided the opportunity to attain the certifications necessary to become a full crew member. It is essential that GXT take an active role, in consultation with the Nunatsiavut Government, to ensure that this training and certification take place for Labrador Inuit.

The comparison made between the annual offshore seismic of 2009-2012 and of 2004-2007 does not address the issue of Catch per Unit Effort (CPUE).When the quantity of annual offshore seismic is compared to CPUE in Division 2) for Snow Crab. There is an inverse relationship between CPUE and seismic activity during 2007-2011. This is concerning given that there was 1072 km of seismic acquired in 2007, expanding to 11.572 km of seismic in 2012, and for 2013 there is well over 20.000 km of seismic proposed for the Labrador Coast. Given the uncertainty associated with the impacts of seismic. A recent decrease in CPUE and fishers reporting limited catches after the presence of seismic *vessels*, seismic *activity* on the Labrador Coast should be limited or stopped until a complete and thorough understanding of the impacts of seismic is gained.

In response to comment A8 (pg. 7), GXT states: "If any larger-scale or general negative effect on the Inuit fishery and/or subsistence fishing were suspected, GXT would expect that any investigation of causes would need to be conducted by an independent agency, such as the C-NLOPB or DFO."The NG believes that this investigation should be undertaken prior to negative impacts on the Inuit fishery and/or subsistence fishing. The fishery is essential to Labrador Inuit and any long-term impacts would be highly detrimental. Therefore, properly understanding the impacts of seismic on the marine system is essential before *moving* forward current or future seismic work.

GXT states (response to FFAW Comment AS, pg. 24): "The conclusion of 'no significant effects' on commercial fisheries from the proposed seismic program was based on existing scientific literature and professional judgment." The Nunatsiavut Government requests that all scientific literature be identified and provided and that GXT expand on what professional judgment entails.

Furthermore, in the consultation report, as well as in responses within the addendum, GXT fails to address the direct impact that seismic may be having on harvested species. A lack of data and scientific information on the impacts of seismic on a marine system does not indicate that there are not impacts due to seismic process. The burden of proof does not, and should not; rest on the shoulders of Inuit stakeholders to demonstrate a cause and effect relationship with seismic processes and the fisheries.

The importance of understanding impacts prior to moving forward with a seismic program is highlighted by the decisions currently being made regarding seismic on Nunavut's coast, east of Baffin Island. The National Energy Board has "evidenced deficiencies regarding the assessment of socio-economic impacts and Inuit consultation" in regards to a proposed seismic program off East Baffin Island. The issues raised by Inuit in Nunavut are no different than the concerns raised in Nunatsiavut. These issues include seismic effects on the movement and behaviour of fish and wildlife and understanding acoustic properties and movement (I.e. modeling of marine seismic, including information indicating how far sound travels within the project area). If a proponent cannot demonstrate explicitly that there will not be impacts on wildlife, the environment and the fisheries, the seismic program should not *move* forward until these issues *have* been completely *resolved,* as is the case in Nunavut.