
FISH, FOOD AND
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Elizabeth Young
Environmental Assessment Officer
Canada-Newfoundland and Labrador Offshore Petroleum Board
140 Water Street, 5th Floor, TD Place
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Ms. Young,

The Fish, Food and Allied Workers Union (FFAW) would like to respectfully submit the following comments for the **Environmental Assessment of GXT's LabradorSPAN 2-D Seismic, Gravity and Magnetic Survey, 2013-2015** for an exploration program offshore Labrador and northern Newfoundland. The FFAW actively engages in reviews and consultations with the Petroleum Industry on behalf of our membership throughout the province of Newfoundland and Labrador. Thank you for providing the **Environmental Assessment of GXT's LabradorSPAN 2-D Seismic, Gravity and Magnetic survey, 2013-2015** for review. While the FFAW is generally supportive of proposed projects helping to stimulate the provincial economy, we must balance that support with the responsibility to protect the interests of our members, fish harvesters and plant workers, and the health of the ocean for future generations.

It would be incumbent on GX Technology to submit an Environmental Assessment entailing all proposed operations to be pursued. Within the second paragraph of the document it is indicated that the temporal scope for this project is 2013-2015, albeit there are only indications of current plans showing 2D seismic acquisition in 2013.

For some general commentary on the document, there are references to Newfoundland and Labrador, then there is Newfoundland including Labrador, finally there is reference to NL – there should be consistency through out the document. Another disturbance within the document is the usage of location/direction using letter form and full written form – same recommendation, there needs to be consistency throughout the document. Finally, on the same point of consistency it is recommended that the document always include the *Genus and Species* names for the various animals/fish being discussed – there are multiple instances where only the common English name is being used. Further, looking on page 147 there is a list of organizations contacted during the consultation process; in this the Groundfish Enterprise Allocation Council is listed twice.

There is an unfortunate mention on page 39 which lists Cod as being a flat fish.

Moving to some other linguistic corrections. On page 8 of the document just prior to section 2.2.2 the word “though” should likely read *through*. On page 26 in the second last bullet it is suspected that “trends” should read *tends*, but the proponent can advise if it is otherwise. In context of fisheries

avoidance there is a mention of *No Gear Deployment Enroute to Survey Area*, “GXT will not deploy is array or streamer ...” (sic.) the proponent would have to clarify what is implied with “is” in this instance. There is a need for clarity, or spell check, on the first full sentence on page 158 “...Project have indicate that frequent, timely...” (sic).

In the section dealing with American Plaice there is a reference to SA2, without a qualifier of any kind. The term is used in the context of what appears to be NAFO region 3K, yet there is nothing clearly identifying this either. It is unfortunate that a document aiming to inform the reader of the environmental circumstance fails the clearly identify that which is being talked about. On page 37 there is a reference to SA2 without any qualifier what this is. Again on page 40 there is reference to “maiden 2SW salmon” and “SFA 1” are brought up without qualifiers, SFAs are not properly mentioned and depicted until on page 75.

The FFAW would like to suggest that the proponent prepare maps in a context where it is possible to see the project area, fish distribution, Seismic survey lines and NAFO regions all in one depiction. It is not sufficient that the variety of information be presented individually.

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. Page 162 indicates that there for previous Newfoundland & Labrador surveys has been a temporal and spatial separation plan; the FFAW would feel inclined for the proponent to indicate said occurrences. In the context of the surveys estimating the biological abundance, for the FFAW Science there is no such concept of adequate “quiet time” – the FFAW is unsure what is being implied and would like to reiterate that there be no activity in the areas of the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab.

The FFAW reviewer is only aware of the implementation of spatial separation of about 20 nautical miles having been discussed in the context of any recent programs in Newfoundland & Labrador. The FFAW therefore reiterates the concern that exposure to seismic activity can have an effect on harvested species. Any impact on surveys and/or stock assessments would have a lasting impact for harvesters. Although the proponent suggests that there would be no significant cumulative effects on the commercial fisheries from the seismic program (page 251). The FFAW is obliged to again state that any impact on either harvesting or fisheries science should be recognized as unacceptable in Newfoundland & Labrador waters.

The FFAW and all the affected fish harvesters are eager to work collaboratively with GX Technology to ensure that everyone shares the prosperity hoped to be created from seismic and harvesting activities. I thank you for providing an opportunity for the FFAW to comment on the GX Technology 2D Seismic Environmental Assessment. If you have any questions or comments please feel free to contact me.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison