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FISH, FOOD AND  
ALLIED WORKERS

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DAVID DECKER  
SECRETARY-TREASURER

Thursday, July 18, 2013

Darren Hicks  
Environmental Analyst  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
140 Water Street, 5th Floor, TD Place  
St. John's, NL A1C 6H6

Mr. Hicks,

Having reviewed the responses provided by GX Technology Canada Ltd. to the Canada-Newfoundland & Labrador Offshore Petroleum Board dated June 14<sup>th</sup>, 2013 (supplement, June 30<sup>th</sup>, 2013), I respectfully provide the below follow up.

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 17<sup>th</sup>-20<sup>th</sup>, 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 acronym's 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 FFAW's 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.

Yours truly,

Jóhan Joensen  
Petroleum Industry Liaison