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FISH, FOOD AND  
ALLIED WORKERS

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Friday, August 09, 2013

Elizabeth Young  
Environmental Assessment Officer  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
140 Water Street, 5th Floor, TD Place  
St. John's, NL A1C 6H6

**Re: GX Technology Canada Ltd. 2-D Seismic, Gravity and Magnetic Survey for the Labrador Shelf Area, 2013 to 2015 Environmental Assessment**

Please accept the following observations on the responses provided by GX Technology Canada to review comments submitted by the Fish, Food and Allied Workers Union (FFAW).

In broad strokes with regards to the responses it is inherently insufficient to respond with "noted". When it is apparent that there are deficiencies identified with an Environmental Assessment, these need to be addressed and not noted. Noting that the reviewer identifies something is almost to be considered a non-response – this applies for any responses given to the Canada-Newfoundland and Labrador Offshore Petroleum Board in the view of the FFAW.

- #1: As this seismic program covers the vast area of the Labrador Shelf, the FFAW feels it pertinent that, although there might be changes to the plans, the tentative plans for the subsequent years be presented. If there are no lines planned for future years one cannot suggest that the plans are changing – it would effectively be new plans.
- #2: As with all intentions, without being specific there is the opportunity for misunderstanding.
- #3: The reviewer would suggest that consistency should paramount and not only preferred.
- #5: Looking at the discussion on the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab locations charted in the referenced figure from the EA (Figure 4.42), what is instantly apparent is that the seismic survey lines are not presented together with the Snow Crab survey locations.  
Although, GX Technology Canada has provided the FFAW with a number of maps that include more of the information that has been requested, there is no depiction with the seismic and fisheries science overlays together.
- #6: The FFAW has not been consulted and has not consented to anything pertaining to a temporal separation from the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab stations. As the survey is a collaborative effort and only one party of the science has been consulted, this does not equal appropriate or sufficient rational for this temporal inclusion. In the previous

response the FFAW also requested that GX Technology Canada provide information on what other programs the temporal separation had been included in, and also when these had taken place.

In the view of the FFAW all of the stations that are being utilized in the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab are active from the opening of the commercial harvesting season and until the survey has been completed. Therefore, the notion of a seven day temporal separation before these stations become “active” is without substance.

#7: It is clear that the suggested continued discussions with the relevant parties has not fully commenced. This is evident in the fact that FFAW Science is yet to be contacted on the matter of the suggested temporal separation from the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab.

Yours truly,

Jóhan Joensen  
Petroleum Industry Liaison