



9 August 2013

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

Re: GX Technology Canada Ltd. 2-D Seismic, Gravity and Magnetic Survey for the Labrador Shelf Area, 2013 to 2015 Environmental Assessment: 9 August 2013 Comments from the FFAW concerning GXT's responses to the FFAW's 18 July 2013 supplementary comments

The FFAW in its 9 August 2013 letter to the C-NLOPB (observations on GXT's responses, J. Joensen to E. Young), states:

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.

There was one instance where GXT did use only the word "noted" in reply to the FFAW;<sup>1</sup> this was in response to the following FFAW statement (which GXT did not interpret as a question or as a request that additional information be provided):

**Comment FFAW 4:** Re: Responses to [FFAW Comment] 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.

**GXT Response:** Noted.

From our perspective, GXT had supplied a full answer in our previous response to the FFAW's original comment (30 June 2013) about the use of scientific names in the EA:

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<sup>1</sup> When the word appears in any other response (e.g. to the FFAW's concerns about using "NL" to designate the province of Newfoundland and Labrador), additional information / explanation is provided.

**FFAW Comment A4.** 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.

**GXT Response:** The scientific name is provided with the first substantive reference to a particular species in the EA. Afterwards, where there is no ambiguity, only the common name is used for brevity. This is common practice in science publications; see for instance current DFO Science Advisory Reports and CSAS Research Documents.

Since the 18 July FFAW comment had not requested any additional information, and since GXT had replied previously to the matter, no additional commentary was given by GXT other than stating that the statement was noted.

By way of a fuller response to the FFAW's 18 July 2013 Comment (Comment FFAW 4), GXT offers the following:

GXT acknowledges the reviewer's purpose in pointing out the issue of the appropriate use of scientific names for fish, and fully agrees with the need for scientific names to be provided with the first substantive reference to each species. As noted in our original response, this is the principle that was applied in the writing of the EA. See for instance, EA pp 32 – 43. GXT also notes that the DFO reviewers, during their examination of the EA and our subsequent responses to comments, did not raise concerns or note any confusion about GXT's use of scientific identifiers.

Best regards,

Robert Pitt  
Environmental Manager  
ION Geoventures / GX Technology

Cc Dean Kennedy, GXT Project Manager