

GX Technology Canada Ltd.'s LabradorSPAN 2D Seismic, Gravity and Magnetic Survey  
Environmental Assessment Amendment (Ion GX Technology March 2016)

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**General Comments**

**Fisheries and Oceans Canada (DFO)**

Please note that the planned changes to the project temporal scope and data acquisition as described in the March 2016 EA Amendment and the related evaluation of predicted effects and mitigations seems to be logical and consistent with the predicted outcomes described within the original project EA. That being said although there are currently no areas that have been designated as critical habitat for Species at Risk Act (SARA) listed species in the project area given that the proposed geophysical program is planned to extend to 2020 the status of designation of critical habitat for SARA listed species may (or may not) change. As such any future EA Updates should bear this in mind and ensure that they reflect the most current and accurate information vis a vis SARA species listings and critical habitat designations as well as possible changes relative to existing and active commercial fishing activity.

**Department of National Defence (DND)**

- Please identify a specific individual or office to serve as a Point of Contact (POC) for MARLANT queries and concerns;
- Please ensure the appropriate Notice to Mariners will be issued for all underwater activities and any significant surface ventures, such as use of flares, buoys, and unconventional lighting;
- Please ensure the appropriate Notice to Airmen will be issued for all activities that could affect air safety, such as use of balloons, Unmanned Aerial Vehicles (UAVs) or tethered airborne devices; and
- Please ensure engagement of CTF 84, through Director General Naval Strategic Readiness (DGNSR), to ensure de-confliction with possible Allied submarine activities.

Due to the inherent dangers associated with UXO and the fact that the Northwest Atlantic Ocean was exposed to many naval engagements during WWII, should any suspected UXO be encountered during the course of the operations, the Proponent should not disturb/manipulate it. The Proponent should mark the location and immediately inform the Coast Guard. Additional information is available in the 2010 Annual Edition - Notices to Mariners, Section 37. Further UXO general information is available at our website at [www.uxocanada.forces.gc.ca](http://www.uxocanada.forces.gc.ca).

**Nunatsiavut Government**

The Nunatsiavut Government is not supportive of the proposed activities and timelines within the amendment. The NG finds that the proposed activities and temporal scope within the amendment deviate from the original Environmental Assessment to the

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degree that it is no longer valid and finds that the assessment provided in the amendment to be inadequate to assess impacts to VECs and cumulative impacts. The request to extend the length of the program from 2015 to 2020 would add four years of seismic activity to the proposed program which is not properly assessed in the amendment. Furthermore, the request to increase the maximum annual production to 16,000 km lines goes well beyond what was originally approved (8,500 km lines) in the original EA. The environmental impacts of this extension have not been properly assessed by the company and have not been properly scrutinized by the regulatory authority and its reviewers. This is illustrated in Section 5 of the Amendment which solely assesses the impacts of the doubling of production lines by referencing the sections of the 2013 Environmental Assessment.

As an extension of the above, the amendment fails to properly address cumulative impacts. Proper cumulative impact assessments are required to fully assess the additive or multiplicative effects of potential projects. Therefore forgoing assessment with the reasoning that the number of active projects is unknown, as stated on page 13 of the Amendment is unacceptable EA practice. The proponent should clearly state and assess the maximum number of potential projects within the extended temporal scope of their program. Although the NG prefers EAs with annual timelines, the annual EA Update process should only be used to update cumulative impact assessments as more concrete information becomes available.