



**NUNATSIAVUT**  
kavamanga Government

Nunaligninikmik amma Nunamiutanik  
Ujaganik Imaniklu

Lands and Natural Resources

April 13, 2016

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**RE: Nunatsiavut Government's Response to 'GX Technology Canada Ltd.'s  
LabradorSPAN 2D Seismic, Gravity and Magnetic Survey Environmental Assessment  
Amendment'**

Dear Mr. Hicks,

Please find below our comments with respect to GXT's LabradorSPAN 2D Seismic, Gravity and Magnetic Survey EA Amendment, submitted for review to the Nunatsiavut Government by the C-NLOPB on March 23, 2016.

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and temporal scope within the amendment deviate from the original Environmental Assessment to the degree that it is no longer valid and finds that the assessment provided in the amendment to be inadequate to assess impacts to VECs and cumulative impacts.

Since this EA amendment is outside of the scope both temporally and with regards to the maximum annual production, a fully revised EA should be required to be completed, as well as an application for an annual exploration license that clearly outlines the planned activities for 2016.

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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.

For the reasons identified above, the Nunatsiavut Government requests that the C-NLOPB not approve the amendment. We recommend instead that if the proponent intends to pursue the proposed activities that a new Environmental Assessment be submitted for review and consultation whereby the temporal scope and expanded project activities may be evaluated.

Sincerely,



Direct of Non-Renewable Resources  
Nunatsiavut Government

cc.   
Research Manager  
Nunatsiavut Government