



NUNATSIAVUT
kavamanga Government

Nunaligninikmik amma Nunamiutaniq
Ujaganik Imaniklu

Lands and Natural Resources

July 18, 2013

Darren Hicks,
Environmental Analyst
Canada-Newfoundland and Labrador Offshore Petroleum Board
140 Water St., 4th Floor
St. John's, NL A1C 6H6
709-778-1431

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

Dear Mr. Hicks,

Please find below our comments with respect to the environmental assessment report addendum of GXT's Seismic, Gravity and Magnetic Survey, 2013-2015.

The Nunatsiavut Government (NG) commends GXT for agreeing to hire and train an Inuit Fisheries Liaison Officer (response to comment A7, pg. 5) and committing to target Labrador Inuit as full crew members on the *Polar Prince* (response to comment A9, pg. 7). However, in order for this to become a reality, Labrador Inuit will need to be trained and provided the opportunity to attain the certifications necessary to become a full crew member. It is essential that GXT take an active role, in consultation with the Nunatsiavut Government, to ensure that this training and certification take place for Labrador Inuit.

The comparison made between the annual offshore seismic of 2009-2012 and of 2004-2007 (response to comment A7, pg. 5) does not address the issue of Catch Per Unit Effort (CPUE). When the quantity of annual offshore seismic is compared to CPUE in Division 2J for Snow Crab, there is an inverse relationship between CPUE and seismic activity during 2007-2011. This is concerning given that there was 1072 km of seismic acquired in 2007, expanding to 11,572 km of seismic in 2012, and for 2013 there is well over 20,000 km of seismic proposed for the Labrador Coast. Given the uncertainty associated with the impacts of seismic, a recent decrease in Catch Per Unit Effort and fishers reporting limited catches

25 Ikajuktauvik Road, PO Box 70, Nain, NL, Canada A0P 1L0 | Tel: 709.922.2942 Fax: 709.922.2931 | Email: nain_reception@nunatsiavut.com

Makkovik
PO Box 92
Makkovik, NL A0P 1J0
Tel: 709.923.2365
Fax: 709.923.2366

Hopedale
PO Box 91
Hopedale, NL A0P 1G0
Tel: 709.933.3777
Fax: 709.933.3746

Rigolet
PO Box 47
Rigolet, NL A0P 1P0
Tel: 709.947.3383
Fax: 709.947.3371

Postville
General Delivery
Postville, NL A0P 1N0
Tel: 709.479.9880
Fax: 709.479.9891

Happy Valley - Goose Bay
1A Hillcrest Road, PO Box 909, Str. 'B'
Happy Valley - Goose Bay, NL A0P 1E0
Tel: 709.896.8582
Fax: 709.896.2610

North West River
7-13 River Road, PO Box 234
North West River, NL A0P 1M0
Tel: 709.497.8356
Fax: 709.497.8311

after the presence of seismic vessels, seismic activity on the Labrador Coast should be limited or stopped until a complete and thorough understanding of the impacts of seismic is gained.

In response to comment A8 (pg. 7), GXT states: "If any larger-scale or general negative effect on the Inuit fishery and/or subsistence fishing were suspected, GXT would expect that any investigation of causes would need to be conducted by an independent agency, such as the CNLOPB or DFO." The NG believes that this investigation should be undertaken prior to negative impacts on the Inuit fishery and/or subsistence fishing. The fishery is essential to Labrador Inuit and any long-term impacts would be highly detrimental. Therefore, properly understanding the impacts of seismic on the marine system is essential before moving forward current or future seismic work.

GXT states (response to FFAW Comment A8, pg. 24): "The conclusion of 'no significant effects' on commercial fisheries from the proposed seismic program was based on existing scientific literature and professional judgment." The Nunatsiavut Government requests that all scientific literature be identified and provided and that GXT expand on what professional judgment entails.

Furthermore, in the consultation report, as well as in responses within the addendum, GXT fails to address the direct impact that seismic may be having on harvested species. A lack of data and scientific information on the impacts of seismic on a marine system does not indicate that there are not impacts due to seismic process. The burden of proof does not, and should not, rest on the shoulders of Inuit stakeholders to demonstrate a cause and effect relationship with seismic processes and the fisheries.

The importance of understanding impacts prior to moving forward with a seismic program is highlighted by the decisions currently being made regarding seismic on Nunavut's coast, east of Baffin Island. The National Energy Board has "evidenced deficiencies regarding the assessment of socio-economic impacts and Inuit consultation" in regards to a proposed seismic program off East Baffin Island. The issues raised by Inuit in Nunavut are no different than the concerns raised in Nunatsiavut. These issues include seismic effects on the movement and behaviour of fish and wildlife and understanding acoustic properties and movement (i.e. modeling of marine seismic, including information indicating how far sound travels within the project area). If a proponent cannot demonstrate explicitly that there will not be impacts on wildlife, the environment and the fisheries, the seismic program should not move forward until these issues have been completely resolved, as is the case in Nunavut.

Best regards,



Rodd Laing,
Environmental Assessment Manager