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**RE: GX Technology Canada Ltd. 2D Seismic, Gravity and Magnetic Survey  
(2013-2015)**

Dear Mr. Hicks,

Please find below our comments with respect to the project description of the GX Technology Canada Ltd. 2D Seismic, Gravity and Magnetic Survey (2013-2015).

The project description states that the proposed seismic survey is not expected to interact with coastal Valued Ecological Components (VECs) or traditional aboriginal resource areas. However, the extent of impact from multiple seismic survey lines on the Nunatsiavut Zone has not been demonstrated. As stated in the Canadian Environmental Assessment Act and associated regulations, the proponent must demonstrate, with a high certainty, the extent of the impacts. Currently, the extent of impacts of seismic on the Nunatsiavut Zone and the Inuit fishery has not been identified. The proposed seismic lines will be within 2 km of the Nunatsiavut Zone, and given the intensity of the air guns (greater than 242 dB) and the distance sound propagates under water, it is likely that there will be significant impacts on VECs and traditional aboriginal resources.

The marine environment is essential to the subsistence lifestyle of Inuit, for traveling and harvesting of traditional foods, as well as for the Inuit fishery. Given the spatial and temporal scale of this project, a growing body of published literature highlighting the negative impacts of seismic and a decreased catch per unit effort reported by Inuit Fishers during previous seismic campaigns, the Nunatsiavut Government recognizes the potential for significant negative impact on Inuit Rights within the Zone as well as the Inuit fishery and resources.

Substantially further Consultation, mitigation and accommodation measures must be put in place prior to any consideration of the proposed project proceeding. These may include, but not be limited to:

-The proponent and CNLOPB should be required to Consult with (and accommodate) Labrador Inuit and the Nunatsiavut Government given constitutionally protected Inuit Rights as well as the Inuit fishery.

-The Nunatsiavut Government recommends that seismic activities not take place prior to September 15<sup>th</sup> of each year, to allow the Inuit crab, turbot and shrimp fishery to take place undisturbed.

-The Nunatsiavut Government recommends that the proponent establish quantitative employment targets for Labrador Inuit. This should be done in consultation with the Nunatsiavut Government and agreed upon by Labrador Inuit.

-Given that the Fish Food and Allied workers union does not represent Labrador Inuit fishers, it is essential that a Labrador Inuit Fisheries Liaison Officer be employed by the proponent on the seismic vessel to interact with Inuit fishery vessels.

-The Nunatsiavut Government recommends an employment outreach program be established for Labrador Inuit, including the establishment of paid trainee positions on-board the seismic vessel in order to build capacity. This would include a recruitment program, transportation assistance and measures to address social or cultural issues, including language barriers.

-If the seismic vessel encounters a fishery vessel, it is essential the seismic vessel give way to the fishery vessel, regardless of the cost (monetary or otherwise) to the proponent.

-The Nunatsiavut Government recommends an annual research report to be submitted to the C-NLOPB and Nunatsiavut Government no later than January 31<sup>st</sup>, detailing the progress, potential environmental impacts and progress on Inuit-specific opportunities.

-The Nunatsiavut Government recommends that financial commitments be made by the proponent, C-NLOPB and/or Provincial and Federal Government to better understand the impacts of seismic surveys along the Labrador Coast. This would include an understanding of baseline physical and biological conditions, as well as an understanding of species important to the Inuit fishery. This research should be agreed upon by the Nunatsiavut Government, Fisheries and Oceans Canada, and independent experts. If changes from baseline conditions were observed through this research, the proponent would accept a degree of responsibility and the burden of proof would not rest on stakeholders to prove a cause and effect relationship.

-The Nunatsiavut Government recommends that GX Technology Canada be required to organize and fund a workshop with stakeholder organizations, including Labrador Inuit and independent experts from academic or equivalent organizations to review and advise on a detailed draft seismic impacts monitoring program designed for the Labrador coast. This workshop should take place prior to any seismic work by the proponent.

Despite the proposed mitigation measures, the Nunatsiavut Government foresees any future seismic region on the Labrador Coast to have a significant impact on the region, Inuit Rights, and the Inuit Fishery and resources.

Sincerely,

Tom Sheldon  
Director of Environment  
Nunatsiavut Government