



NUNATSIAVUT
kavamanga Government

Nunaligninikmik amma Nunamiutani
Ujaganik Imaniklu

Lands and Natural Resources

Darren Hicks,
Environmental Analyst
Canada-Newfoundland and Labrador Offshore Petroleum Board
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Re: GX Technology Canada Ltd. 2D Seismic, Gravity and Magnetic Survey for the Labrador Shelf Area, 2013 to 2015 Environmental Assessment Report

Dear Mr. Hicks,

Please find below our comments with respect to the environmental assessment of GXT's Seismic, Gravity and Magnetic Survey, 2013-2015. It is important to take these comments in the context of our previous submissions and outstanding concerns to the C-NLOPB regarding seismic activity on the Labrador Coast.

Inuit depend on the marine environment for a subsistence lifestyle and for an economic livelihood (Inuit Fishery), and this seismic program could potentially have negative impacts on Inuit health and wellbeing. The GXT seismic program overlaps with the entirety of the Inuit fishery, specifically for shrimp, crab and turbot. Also, the catch weights presented in the report, with data from Fisheries and Oceans Canada, are not representative of the decrease in catch per unit effort for fish and shellfish experienced by fishers on the Labrador Coast since 2008, which corresponds with an increase in seismic activity on the Labrador Coast. Therefore, the Nunatsiavut Government recommends that seismic activities not begin prior to September 15 of each year and is adamant that seismic activities do not disrupt the fishery, irrespective of the seismic survey plan of GXT.

The Nunatsiavut Government recommends that adaptive management for Project-specific or cumulative effects, whether conducted by GXT, government bodies, or in combination, be required. This would include the implementation of contingency plans and resources to enable responsive action, especially in areas where effect predictions are uncertain and where predictive errors may have serious consequences (e.g. disruption to traditional

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livelihoods or Inuit Fishery). Currently, Labrador Inuit bear the majority of the risk associated with seismic processes with few tangible benefits to the region. The Nunatsiavut Government expects the Proponent would accept a degree of responsibility for any negative changes in the Inuit Fishery and subsistence fishing, and that the burden of proof would not rest on Inuit stakeholders to demonstrate a cause and effect relationship with seismic processes and the fisheries.

Benefits for Labrador Inuit with associated seismic processes are a necessity. Hiring, training and ensuring meaningful employment for Labrador Inuit is essential. This could be established through an employment outreach program, which would include transportation assistance and measures to address social and cultural issues including any associated language barriers, if necessary. This would also include the establishment of paid trainee positions to be in place onboard the seismic vessel in order to build capacity. Furthermore, given that our Inuit fishers are not represented by the Fish, Food and Allied Workers Union, the Nunatsiavut Government is adamant that the Inuit Fisheries Liaison Officer be present on the seismic vessel at all times during the Project.

The Nunatsiavut Government recommends that an annual report be submitted to the CNLOPB and the Nunatsiavut Government no later than January 31, detailing the progress and potential environmental impacts of the Project, including progress on the implementation of mitigation measures and Inuit-specific opportunities.

Potential mitigation measures could still be arranged for the 2013 GXT seismic program and the Nunatsiavut Government recommends increased communication and consultation to address the ongoing concerns of Inuit in the region. Currently, few steps have been taken by the proponent to address the potential negative impacts of seismic activity within the Labrador Inuit Settlement Zone and Inuit Fishery.

Best regards,



Rodd Laing,
Environmental Assessment Manager