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Friday, January 10, 2014

Darren Hicks  
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Canada-Newfoundland and Labrador Offshore Petroleum Board  
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St. John's, NL A1C 6H6

Mr. Hicks,

The Fish, Food and Allied Workers Union (FFAW) would like to respectfully submit the following comments in connection with the Scoping and Project Description Documents for the GX Technology Canada Ltd. (GXT) **GrandSPAN, 2014-2018 Marine 2D Seismic, Gravity and Magnetic Survey**. The FFAW engages in reviews and consultations with the Petroleum Industry on behalf of our far-reaching membership throughout the province of Newfoundland and Labrador.

The FFAW wants to indicate that it has the expertise to engage in the Environmental Assessment process. The lead contact within the FFAW would be the Petroleum Industry Liaison (██████████), who would further source the expertise of the pertinent sections of the membership of the organization. This expertise relates to the consultation processes and also experienced knowledge of the marine environment in which the petroleum industry is currently operating.

Having reviewed the Scoping Document and the Project Description, the FFAW has the following quick observations:

- The Project Area is of such a size that it covers a multitude of harvesting activities throughout a calendar year, this is in addition to the sensitive life cycles of the species found in this area.
- It is worth mentioning that there were several issues with the M/V Discoverer during its operations in Canadian waters in 2013. Something is forthcoming on this matter from the FFAW to the C-NLOPB.
- It is worth noting that the Study and Project Areas are exceptionally wide spread when compared to any other programs proposed with the C-NLOPB in recent times. With the coverage being from the Northeast Coast to the Laurentian Channel, it does represent some challenges in the conveyance of information and consultation.
- When it comes to the temporal scope of the work being proposed, the FFAW emphasises the importance of avoiding the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab and this needs to be specifically listed in the Scoping Document. This would entail avoidance until the stations have been completed.

It is of utmost importance that the proponent diligently pursues the consultation process with all other ocean users. This is especially of importance as this program will have the seismic vessel operating close to and within various areas. The Petroleum Industry Liaison with the FFAW is available to assist in arranging consultation sessions specifically aimed at those active within the fishing industry.

Yours truly,



Petroleum Industry Liaison