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Thursday, July 10, 2014

Darren Hicks  
Environmental Analyst  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
140 Water Street, 5th Floor, TD Place  
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Re: GX Technology Canada Ltd.'s GrandSPAN 2D Seismic, Gravity and Magnetic Survey, 2014-2018  
Addendum

Hi Darren,

The FFAW-Unifor has gone through the responses provided by GX Technology Canada Ltd., to the comments provided to the Environmental Assessment (EA) for the proposed GrandSPAND 2D Seismic, Gravity and Magnetic Survey.

The 7 day temporal separation is **NOT** an acceptable mitigation for fisheries or fisheries science in the view of the FFAW|Unifor. In relation to the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab, the 7 day temporal separation is not an acceptable protocol. Furthermore, this perspective is shared by our scientific partners at Fisheries and Oceans Canada.

Re-Comment 8:           It is evident that there is a difference in opinion in what is considered effective, appropriate and precautionary.

It would be apparent by the initial comment provided by FFAW|Unifor that there is a strong opinion on what is no an acceptable mitigation when it comes to the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab. That the perspective is shared by our scientific partners at Fisheries and Oceans Canada, but not reflected in the Environmental Assessment or the responses is disconcerting. Other Environmental Assessments and/or addendums have provided material towards this stance and accepted that the only acceptable mitigative approach is one where no seismic activity occur on or around a Snow Crab Survey Station until it has been completed in a given year.

The FFAW-Unifor continues to be available for consultations between the proponent and fishing industry.

Yours truly,

Jóhan Joensen  
Petroleum Industry Liaison