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Thursday, January 21, 2016

Darren Hicks  
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**Re: GX Technology Canada Ltd.'s GrandSPAN 2D Seismic, Gravity and Magnetic Survey, 2014-2018 Environmental Assessment Amendment (for 2016-2018)**

Hi Darren,

The FFAW-Unifor has reviewed the Amendment proposed by GX Technology Canada Ltd. to the 2014-2018 Environmental Assessment for 2D Seismic, Gravity and Magnetic Survey.

As in our comments regarding the original submission of the EA, there are some concerns on behalf of the fishing industry given that the timeline (May-December) is a period of high fish harvesting activity. Interaction with the Post-Season Snow Crab Survey is also a major concern. We put forth the following comments:

p. 7/8 – Two 2D vessels operating in different parts of the survey area at the same time, rather than one, or one 2D and one 3D, increases concern that fish species and harvesting could be impacted on an even greater basis than proposed in the original EA. More area will be affected (20,000 km as opposed to the original 14,000 km).

p. 44 – Column Total (2013)/row Value \$ (Feb), comma should be placed between 4 and 7, not a decimal

p. 77 - FFAW-Unifor reiterates the point that effects of seismic on key commercial species in the areas (i.e. groundfish, snow crab, northern shrimp) are unknown and that research has not provided a consistent evidentiary base on which to say effects will be "localized and/or temporary." Similarly, to say fish might move toward harvesting

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activity when avoiding seismic noise and that this is the “logical” conclusion is very assumptive and some evidence to this regard should be referenced.

p. 79 - While the statement that little evidence exists that negative effects on fish occur at distances greater than several meters, the opposite is also correct, as there is a lack of sound evidence on the effects of seismic noise on the most common marine fish species in the area. As we do not have a sound basis on which to make the statement, it is also unknown whether or not the effects are temporary or localized. The last paragraph on the page, therefore, makes a broad, general statement that cannot be proven or disproven as evidence of either argument has not been accepted as finite. To say this is “very unlikely” is, at the opinion of the reviewer, incorrect and misleading.

p. 83 - The increased temporal separation that comes with the proposed 3D Amendment is a concern to FFAW-Unifor, as is the increase in marine vessel traffic in the proposed area.

p. 85 - As stated in previous responses to GXT, 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. There should be no seismic activity in the vicinity of these survey stations.

p. 88 - While it is stated that only a small amount of overlap will occur with 3D seismic and the FFAW-DFO Post-Season Industry Snow Crab Survey, it is implied that the proposed 3D option will increase vessel traffic and activity in the area. It is imperative to note that **NO** seismic activity should begin in survey station areas until the stations have been completed. There is a strong opinion that overlap is **NOT** 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 Amendment. Other Environmental Assessments and/or addendums/amendments 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 consultation with the proponent and the fishing industry.

Regards,

Projects Coordinator/Petroleum Industry Liaison

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