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**KEITH SULLIVAN**  
President

**DAVID DECKER**  
Secretary-Treasurer

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Tuesday, May 14, 2019

Darren Hicks  
Environmental Analyst  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
140 Water Street, 5<sup>th</sup> Floor, TD Place  
St. John's, NL A1C 6H6

**Re: GX Technology Canada Ltd. GrandSPAN Marine 2D Seismic Gravity and Magnetic Survey 2014-2018 – 2019 EA Amendment**

Dear Mr. Hicks,

FFAW-Unifor members have consistently raised concerns regarding seismic activity and potential impacts on catch rates for commercial fishing and science surveys.

Following review of the temporal and spatial amendment for this program I would like to reiterate concerns from last year's program with respect to mitigations proposed by the proponent. There were several close calls in terms of avoiding active fishing areas as well as seismic work conducted very close to crab stations being actively-fished during the post-season crab survey last year.

Avoidance by seismic operators of active fishing areas and research surveys cannot be only a mitigation written in an Environmental Assessment document. The mitigations and importance of them needs to be effectively communicated to all individuals involved in the at-sea program.

FFAW-Unifor will work with the proponent to communicate as much information as available in advance of the program starting as well as throughout during weekly (or more frequent) conference calls but the commitment needs to carry through on the operator's end to mitigate conflict at sea as well.

If you have any questions or comments please feel free to contact the undersigned.

Kind regards,

Robyn Lee  
Petroleum Industry Liaison

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