



PO Box 10, Station C
368 Hamilton Avenue, 2nd Floor
St. John's NL A1C 5H5

FFAW | UNIFOR
Fish, Food & Allied Workers

Tel: 709.576.7276
Fax: 709.576.1962
Web: www.ffaw.nf.ca

EARLE McCURDY
President

DAVID DECKER
Secretary-Treasurer

Thursday, July 03, 2014

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

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 GrandSPAN 2D Seismic, Gravity and Magnetic Survey.

Looking at responses to the general comments:

FFAW Position regarding the 7 day temporal separation

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.

Review of responses to FFAW|Unifor comments:

No response to the comment referencing page 9.

Re-Comment 3: It is still incumbent upon the reviewer to reiterate that the lines are projected to cover many of the most important fishing grounds in Newfoundland and Labrador waters, some of which see harvesting activity in all 12 months of the year.

Re-Comment 4: The reviewer would suggest that part of the text in the Environmental Assessment could read "The support ship will have responsibilities in assisting the Fisheries Liaison Officer in communicating with fishing vessels".

Re-Comment 7: The FFAW|Unifor has to reiterate that the DFO RV Trawl survey is used secondary to the Industry-DFO Collaborative Post-Season Trap Survey for Snow

Crab when it comes to the distribution and assessment of snow crab in Newfoundland and Labrador waters.

Re-Comment 11: The FFAW|Unifor notes the token mention of fisheries pre-moratorium but would suggest that something more substantiated would be warranted in light of the environmental changes.

Comment referencing page 253 of the Environmental Assessments has seen no response.

Re-Comment 12: Please see response to comment 1!

Re-Comment 13: Please see response to comment 1!

Re-Comment 14: *If* precaution is such a fundamental part of Project planning and a guide to the Project throughout its implementation, avoidance of active fishing grounds and appreciation of the issues the fishing industry has with GX Technologies suggested approach re: Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab would be warranted.

Re-Comment 15: In the event that there is fishing gear in the proposed path of the seismic vessel, it is incumbent upon the seismic vessel to adjust its course to avoid interference with an active fishing environment.

Re-Comment 16: Please see response to comment 1!

Please note that there is no response to the comment provided for the language structure on page 340 in the Environmental Assessment.

It would be apparent by the initial comment provided by FFAW|Unifor that there is a strong opinion on what 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 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