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**KEITH SULLIVAN**  
*President*

**DAVID DECKER**  
*Secretary-Treasurer*

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Tuesday, March 17, 2015

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

Mr. Hicks,

The Fish, Food & Allied Workers (FFAW-Unifor) would like to respectfully submit the following comments in connection **Bridgeport Holdings Ltd. North Flemish Pass Gravity Survey 2015-19, Environmental Assessment**. FFAW|Unifor engages in reviews and consultations with the Petroleum Industry on behalf of our far-reaching membership throughout the province of Newfoundland & Labrador. While FFAW|Unifor is generally supportive of proposed projects helping to stimulate the provincial economy, we must balance that support with the responsibility to protect the interests of our members, fish harvesters and plant workers, and the health of the ocean for future generations.

The commercial fishery is very important to the many rural communities in Newfoundland & Labrador. While the membership of FFAW|Unifor lives in all regions of the province, there are some who have the livelihoods depending on the fish in NAFO Divisions 3KLNO in which it is estimated that the proposed activities will take place.

There are a couple of comments that we would like to note in connection with this Environmental Assessment.

- The EA indicates that exploration and production companies would not consider alternate survey methods. Yet, in the consultation for this project was only confirmed to be done by air late in the process. As this EA only considers airplane as acquisition platform, there needs to be a new consultation process if alternate platforms are considered at a later date.
- The summary and conclusions suggests that "concurrent drilling, seismic surveys, well site, geohazard and VSP surveys conducted in this region for decades have not resulted in claims that significant adverse effects to biological or socio-economic VECs of the area." Harvesters have observed impact on their catch rates which may be contributed to exploration

activities. Therefore, it is not an accurate description which is contained in the conclusions of the EA.

FFAW|Unifor and all the fish harvesters and plant workers are eager to work collaboratively with Bridgeporth Holdings Ltd. to ensure that everyone shares the prosperity hoped to be created from petroleum exploration and fish harvesting activities. I thank you for providing an opportunity for FFAW|Unifor to comment on the **Bridgeporth Holdings Ltd. North Flemish Pass Gravity Survey 2015-19, Environmental Assessment**. If you have any questions or comments please feel free to contact me.

Yours truly,

Jóhan Joensen  
Petroleum Industry Liaison

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