



---

**KEITH SULLIVAN**  
*President*

**DAVID DECKER**  
*Secretary-Treasurer*

---

Wednesday, December 03, 2014

Darren Hicks  
Environmental Analyst  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
140 Water Street, 4<sup>th</sup> Floor  
St. John's, NL

Dear Darren,

FFAW-Unifor would like to respectfully submit the following comments in connection with the Scoping and Project Description Documents for the Bridgeporth Holdings Ltd. and JEBCO Seismic Company, **North Flemish Pass Gravity Survey**. FFAW-Unifor engages in reviews and consultations with the Petroleum Industry on behalf of our far-reaching membership throughout the province of Newfoundland and Labrador.

FFAW-Unifor wants to indicate that it has the expertise to engage in the Environmental Assessment process. The lead contact within FFAW-Unifor would be the Petroleum Industry Liaison (██████████), who would further source the expertise of the pertinent sections of the membership of the organization. This expertise relates to the consultation process and also experienced knowledge of the marine environment in which the petroleum industry is operating.

Having reviewed the Scoping Document and the Project Description, FFAW-Unifor has the following quick observations:

- The Project Area is of such a size that it covers a multitude of harvesting activities throughout a calendar year.
- The title of the program is not an accurate reflection of the area considered to be the Project Area.
- FFAW-Unifor was initially approached to have a consultation on this project. However it was later decided there would be no marine proponent and no consultation was had.

It is of utmost importance that the proponent diligently pursues the consultation process with all other ocean users. The Petroleum Industry Liaison with FFAW-Unifor is available to assist in arranging consultation sessions specifically aimed at those active within the fishing industry.

Yours truly,

██████████  
Petroleum Industry Liaison

---