

Canada-Newfoundland and Labrador Offshore Petroleum Board
5th Floor, TD Place
140 Water St., St. John's, NL A1C 6H6
(709) 778-1400
information@cnlopb.nl.ca

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Re: Public Comments – Old Harry Project

I am a resident of the Gulf of St. Lawrence and although not born here, I have had a long relationship with the region. My work has been in fisheries management, and in ecological management. I have reviewed numerous EIA's on various types of projects, many with a marine connection. I have served on the FRCC, chaired DFO-Industry Committees and been a member of many more. I have co-chaired a committee developing a monitoring program for finfish aquaculture.

I have unease with the project proposal, because being a staunch believer in the precautionary approach, I feel that it's the stance that should be taken in this situation. However, I recognize that the process has been triggered and we will go through a number of processes before the Board has the information needed to take a position. Given that, I would like to offer some suggestions on the process and the contents of the document Corridor Resources will be required to file with the Canada Newfoundland-Labrador Offshore Petroleum Board.

First on process: it is important, due to the potential for multi-jurisdictional impacts, should there be an accident/spill etc., that the consultation be as broad as possible with the opportunity for the public to be involved in all five provinces. As well, Corridor should be required to identify to the public, the "interested parties" it will contact under section 4 of the Scoping Document Draft. Also, members of the public, particularly Aboriginal groups in the Gulf of St. Lawrence coastal area, community groups, fisheries organizations, NGO's working in the coastal and marine environment and coastal residents, should have the opportunity to add to the list or request direct consultations.

Again, because this project has the potential for impacts environmentally, socially and economically in the five jurisdictions, there should be a portion of the document that outlines the history of the sea territory jurisdiction. The 1967 Agreement should be noted, with discussion on this particular site and its boundaries in relation to that agreement. The

map suggests that this site is on the boundary edge of the line established as the boundary between NS and NFL/ Lab.

The proponent should be required to define “cumulative environmental effects” as the term is to be used in the Screening Environmental Assessment. This is suggested because the true understanding of the term is often assumed to mean something while from the scientific perspective, we are still very far from understand how to conduct a cumulative impact assessment on an ecosystem. One component that may help in this and which for many aspects of the Report would be helpful, would be if a habitat classification could occur within the boundaries identified in the Screening document by the proponent.

I would anticipate that the document, within its relevant sections would include discussion on impact of the drilling schedule and potential production on wintering cod fish. It needs to also discuss impact of seismic activity on marine mammals and pelagic fish, routinely in the area or migrating through and or feeding or raising young. Mitigation that could be considered would be that there be a spotter who is required to report regularly of sightings of marine mammals and then a protocol is developed to respond to the sighting.

The experience with the Gulf of Mexico disaster has made the public very shy of oil and gas exploration because of the huge impact it can have. There needs to be description of the technologies that will be employed and their track record and a description of mitigation methods to technological or human error events, identifying the strengths and or weaknesses of those mitigations.

When identifying the VECs, the proponent should contact the Aboriginal communities to identify traditional usages of the area and the VECs from the Aboriginal perspective.

And finally, although it is not a common practice, may I suggest that the completed Screening Environmental Report be available to the public for review and comment at the same point that it goes to the expert departments and agencies.

The Gulf of St. Lawrence has played and continues to play an important role in the history and future of Canada both from the environmental/ecological perspective as well as the human social and economic perspective. The public needs to know that its interests are being protected.

Sincerely,

Marianne Janowicz

