



Jill Adams
Canadian Environmental Assessment Agency
Newfoundland and Labrador Satellite Office
10 Barters Hill, Suite 301
St. Johns, NL
A1C 6M1

October 11, 2018

Dear Ms. Adams,

Thank you for the opportunity to comment on the Draft Agreement to Conduct a Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador. Please find our comments and questions below.

1. The Nunatsiavut Government (NG) acknowledges section 4.6 stating that “existing information and knowledge includes, but is not limited to, any Strategic Environmental Assessment...” It is the NG’s understanding that a Strategic Environmental Assessment is intended to assess the impacts of a specific programme or policy (in this case, oil and gas development) to an area. As such, the Draft Agreement should specifically state why the REA is required above what an update to the Eastern Newfoundland Strategic Environmental Assessment could accomplish. From the preamble, it is assumed this is due to the *Advance 2030* program by the Newfoundland and Labrador Government.
2. The number of exploratory wells should be determined through an SEA or REA which would assess the appropriate number of exploratory wells based on the environmental impacts. The *Advance 2030* goal of drilling 100 exploratory wells by 2030 seems to be a politically-determined number. The NG suggests that the Eastern Newfoundland SEA inform the REA in determining the appropriate threshold of exploratory drilling over time.
3. The *Advance 2030* strategy includes the offshore of the entire province – if the REA will only cover exploratory drilling in the Eastern Newfoundland SEA area, does this mean that the exploratory wells will be only in this area? Please clarify this inconsistency in the Draft Agreement. If the *Advance 2030* plan is to include Labrador or other offshore areas outside of the defined area in the Draft Agreement, this should be clarified in the draft agreement. The Labrador Strategic Environmental Assessment is currently undergoing an update. The Nunatsiavut Government expects that this will be the guiding document for all oil and gas related activities.
4. In the pre-amble, please clarify how exactly an REA will improve the efficiency of the environmental assessment process as it applies to oil and gas exploration. In our experience, the delays in <Contact information removed>

environmental assessment processes have been due to the pre-mature submission of EAs, poor quality EAs, and to regulators' lack of consistency in EA requirements. As an example, delays in the Labrador Shelf SEA Update has delayed the Call for Bids until its completion. The NG and the C-NLOPB are now working towards improving issues, but it should be acknowledged that the REA may not solve all issues of delays in environmental assessment.

5. NG commends Section 5.9 and encourages the development of a digital, spatially-based system to house data. It is important that the REA be the beginning of improved data management for Newfoundland and Labrador's offshore environment. An ongoing database should be created to house data gathered from project-based environmental assessments, monitoring programs, and strategic environmental assessment updates.

Thank you for the opportunity to comment on the Draft Agreement.

Sincerely,

<Original signed by>

Claude Sheppard
Director of Non-Renewable Resources
Nunatsiavut Government