



February 13, 2013

Canada-Newfoundland & Labrador Offshore Petroleum Board
140 Water Street
St. John's, NL
A1A 6H6

Dear Ms Young and Mr Hicks:

Transport Canada (TC) has reviewed the White Rose Extension Project - Environmental Assessment Report and the Supporting Documents that were submitted for review. TC has determined that the EA Report adequately addresses the potential environmental effects related to TC's mandate, including the potential cumulative effects and accidents and malfunctions related to increased marine traffic.

Attached are TC's comments on the Environmental Assessment Report. If required, representatives from TC are willing to discuss these comments directly with the proponent and the CNLOPB.

Should you have any questions or comments please feel free to contact me.

Sincerely,



Randy Decker
Senior Environmental Assessment Officer
Environmental Affairs Branch, Transport Canada
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White Rose Extension Project Environmental Assessment Report

Comment No.: Transport Canada - 01

Context:

The Environmental Assessment Report provides detail on construction and associated activities required for various works (i.e. dredging, mooring of WHP at deepwater site; infilling of The Pond) within navigable waters. These works and activities may require review and approval under the *Navigable Waters Protection Act* (NWPA). Any approvals issued under the NWPA will stipulate conditions to protect the public right to navigate during the construction phase of the Project.

Specific Comment / Request for Additional Information:

The Proponent is advised to assess all proposed works, including dredging operations, against the Minor Works and Waters Order.

The Proponent is advised to submit a completed 'Request for Work Approval' for all works and activities that do not meet the criteria outlined in the Minor Works and Waters Orders. Completed requests can be submitted to:

Navigable Waters Protection Program
Transport Canada – Marine Safety
PO Box 1013
Dartmouth, NS B2Y 4K2
P: (902) 426-2726
F: (902) 426-7585
E: nwpcdar@tc.gc.ca

The Minor Works and Waters Order, 'Request for Work Approval' application, and other relevant information are available from the following website:

<http://www.tc.gc.ca/eng/marinesafety/oep-nwpp-menu-1978.htm>



White Rose Extension Project Environmental Assessment Report

Comment No.: Transport Canada - 02

Context:

The Environmental Assessment Report provides details on the project-related vessels, tug requirements, tow-out timelines, construction safety zones, and spill response capabilities. The Report does indicate that the Proponent has a good understanding of their requirements under the *Canada Shipping Act, 2001*.

Specific Comment / Request for Additional Information:

In addition to the applicable regulations under the *Canada Shipping Act*, all international project vessels must apply for a Coasting Trade Permit issued under the *Coasting Trade Act*. This means that the vessel would comply with all applicable regulations under International Maritime Organization (IMO) Conventions, including but not limited to;

- International Convention for the Safety of Life at Sea (SOLAS)
- International Convention for the Prevention of Pollution from Ships (MARPOL)
- International Convention on Standards of Training, Certification, and Watchkeeping for Seafarers (STCW)
- International Convention on Load Lines (LL)
- International Convention on Tonnage Measurement of Ships (TONNAGE)
- International Convention on the Control of Harmful Anti-Fouling Systems on Ships (AFS)
- International Convention on Civil Liability Damage for Oil Pollution Damage (CLC).

The Coasting Trade Permit is actually issued by Canadian Customs in consultation with Canadian Transportation Agency and Transport Canada.

Page 17-15 of the EA Report states that project-related vessels will use designated routes during construction activities to help mitigate interactions with project vessels and other vessels. Transport Canada – Marine Safety would like an opportunity to review the proposed designated routes. Plans on the designated routes can be forwarded to:

Compliance and Enforcement
Transport Canada – Marine Safety
John Cabot Building, 10 Barter's Hill
PO Box 1300
St. John's, NL A1C 6H8
Tel: (709) 772-5167



White Rose Extension Project Environmental Assessment Report

Comment No.: Transport Canada - 03

Context:

Section 15.2.1 of the EA Report provides details on the Nearshore Environment Compliance Monitoring requirements.

Specific Comment / Request for Additional Information:

The Proponent is advised that Transport Canada may conduct compliance monitoring in relation to conditions listed on any Part 1, Section 5 Approval issued under the *Navigable Waters Protection Act*. The potential environmental effects associated with any NWPA approvals may also be evaluated by Transport Canada.



White Rose Extension Project Environmental Assessment Report

Comment No.: Transport Canada - 04

Context:

Page 2-22 of the EA Report states that the Graving Dock may be designed to include a gated system to allow the site to be flooded and drained for future construction use but final design will be determined once groundwater modeling is complete.

Specific Comment / Request for Additional Information:

The Proponent is advised to communicate the final design of the graving dock to Transport Canada should the graving dock remain flooded and accessible to the navigating public once construction activities are complete.