

Environmental Health Programs Regions and Programs Branch 1505 Barrington Street, Suite 1817 Halifax, NS B3J 3Y6

August 5, 2013

Elizabeth Young
Environmental Assessment Officer
Canada-Newfoundland and Labrador Offshore Petroleum Board
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140 Water Street
St. John's, NL A1C 6H6

Subject: Health Canada's response to the Western Newfoundland and Labrador Offshore Area Strategic Environmental Assessment (SEA) Update, May, 2013¹

Dear Ms. Young:

Thank-you for your e-mail dated June 21, 2013 requesting Health Canada's review of the above-mentioned document. Health Canada's is the Federal department that is responsible for helping Canadians maintain and improve their health, while respecting individual choices and circumstances. Provincial health authorities have the primary responsibility for occupational health and safety, except under exceptional circumstances, such as nuclear workers who are covered by the Federal *Nuclear Safety and Control Act*. As such, Health Canada's review of the SEA document has been limited evaluating potential human health issues for those who may be affected by oil and gas activities in Western Newfoundland (e.g. people who live near oil and gas activities) but not specifically worker health.

Section 2.5 lists valued environmental components (VECs) that were considered in the
assessment. Human health is not included as a VEC. Given that these types of projects may
have impacts on human health, human health should be considered a VEC and evaluated in
the SEA.

Off-shore oil and gas activities may result in the contamination of aquatic country foods (also known as traditional foods, which are trapped, fished, hunted, harvested or grown for subsistence of medicinal purposes or are collected from recreational activities). On-shore to off-shore drilling and hydraulic fracturing activities, depending on their location(s) and proximity to human receptors, may impact human health through air quality effects, noise, contamination of drinking/recreational water supplies, and/or contamination of country foods (terrestrial and aquatic flora and fauna).

With respect to hydraulic fracturing activities in particular, human health concerns that have been expressed include the contamination of groundwater and drinking water supplies with fracking chemicals, exposure to waste fracking fluids (including naturally occurring radioactive materials [NORMs] from the subsurface) during their containment and

¹ AMEC Environment and Infrastructure. 2013. Western Newfoundland & Labrador Offshore Area Strategic Environmental Assessment Update. Draft Report. Submitted to the Canada-Newfoundland and Labrador Offshore Petroleum Board. May.

subsequent disposal following recovery, on-going subsurface contamination from waste fracking fluids that are not recovered, noise from operations including increased truck traffic, air quality concerns related to operational activities and off-gassing of well-heads, and the potential for contamination of country foods from fracking fluids and/or hydrocarbon leaks.

For more information about Health Canada's areas of expertise and expectations with respect to information to be contained in environmental assessments (as applicable), Health Canada has recently published a document entitled "Useful Information for Environmental Assessments" which can be found at http://www.hc-sc.gc.ca/ewh-semt/pubs/eval/environ assess-eval/index-eng.php

If you have any additional comments/questions, please contact the undersigned at your convenience.

Sincerely,

Health Canada, Atlantic Region

cc: Manager, Environmental Health Programs, Health Canada
Senior Environmental Health Assessment Specialist, Health Canada