

**RURAL SECRETARIAT
CORNER BROOK – ROCKY HARBOUR REGIONAL COUNCIL**

December 14, 2012

Ms Elizabeth Young
Environmental Assessment Officer
Canada-Newfoundland and Labrador Offshore Petroleum Board
5th Floor, TD Place
140 Water Street
St. John's, NL
A1C 6H6

Dear Ms Young,

On behalf on the Corner Brook – Rocky Harbour Regional Council of the Rural Secretariat, we are writing to highlight our Council's perspectives related to future offshore oil developments in Western Newfoundland. In particular we would like to highlight our concerns about potential hydraulic fracturing ('fracking') in the region. We would ask that, until there is greater understanding and clarity about its potential environmental and social impacts, this technology not be utilized for exploration or extraction purposes.

The Corner Brook – Rocky Harbour Regional Council comprises appointed members from communities across our region, which includes Corner Brook, Bay of Islands, the Humber Valley, White Bay South, Gros Morne National Park and extends north to Daniel's Harbour and Bellburns. The Council is one of ten situated across the province and has a mandate to provide advice to government on issues related to rural and regional sustainability. Many of our Council members attended the recent Strategic Environmental Assessment consultations for the Western NL Offshore Area which took place in October across the region. Based on the information presented at these sessions, Council would like to highlight several key items for consideration:

- We have attached a vision document developed by the Regional Council which includes many of its key values for the region over the next 20 years. The focus of this document is on social, cultural, environmental and economic areas; however it also highlights that '*an integrated approach to development in all areas is needed to ensure future sustainability and prosperity*'. Council feels that there is potential for future offshore oil development to impact many of the values identified in the vision, and we would like to be part of the discussion to ensure that future development impacts have only a positive effect on regional values and assets.
- Council are concerned about the possibility of hydraulic fracturing being using at offshore sites on the West Coast of Newfoundland.

Recently this practice has generated considerable controversy across Canada and some of the science around the safety of 'fracking' is also being questioned.

- We would like to see additional research carried out and communicated to community members in the region, to determine the risks and benefits associated with the practice of 'fracking', and any mitigation measures which could be used to address potential risks. Related to research needs in this area; we are concerned that recent cost cutting by the Federal Government will lead to a reduction in scientific research essential for the study and monitoring of potential impacts of 'fracking'.
- Currently there is a lack of a regulatory framework to guide 'fracking' in and around the province, and until this framework is in place and more research carried out, we believe that 'fracking' should not be used for exploration or extraction as part of offshore oil developments.
- Of significant concern to us are any negative environmental impacts e.g. via oil spills or leaking of 'fracking' chemicals and their potential effects on communities in our region. With both tourism and fishing as our primary industries for many rural parts of the region, any environmental impacts have potential to damage these economic drivers thus substantially impacting the sustainability of our region. In terms of economic value, our tourism industry on the West Coast is worth approximately \$205 million per year (information provided by the Tourism Research Office, Government of NL) and our fishery \$35 million per year (information provided by the RED Ochre Regional Development Board for the Trout River to St Barbe area).
- Currently, the Province is believed to be in the process of drafting legislation to ensure that industries cover the costs of damages/ environmental impacts. We recommend that future offshore developments not proceed until such legislation is in place and there is a joint management plan between all of the provinces involved.

We would welcome the opportunity to be part of an on-going dialogue about offshore development on the West Coast to ensure that any future developments help to maximize sustainability for our communities and region.

We look forward to your response and would be pleased to meet with you and your staff to provide any future clarification or comments on our recommendations.

Sincerely,



Ms. Colleen Kennedy, Co-Chairperson
Corner Brook-Rocky Harbour Regional Council

cc: Minister Keith Hutchings, Minister of Innovation, Business and Rural Development
and Minister responsible for the Rural Secretariat

Mr Steve Bonnell, AMEC Environment and Infrastructure

Dr Bruce Gilbert, Assistant Deputy Minister, Rural Secretariat