

Re Western Newfoundland/Labrador SEA

From: Mark Bishop [REDACTED]

Sent: Tuesday, December 04, 2012 11:17 AM
To: Bonnell, Steve

Cc: [REDACTED]

Subject: Re: Western Newfoundland/Labrador SEA

Steve:

Thank you for your email clarifying the SEA (Western Newfoundland and Labrador Offshore Area) draft review process. We were happy to learn that the consultation session in Charlottetown was a generic information session and that a formal, public review/comment process will occur when the draft SEA is released.

The Prince Edward Island Watershed Alliance represents an Island-wide membership that focuses on preserving and protecting Island watershed assets. With respect to oil/gas exploration and development in the Gulf of St. Lawrence, our concerns focus on regulatory adequacy and specificity with respect to:

- **Prevention:** The Malpeque Bay wetland area is protected by Canada-ratified, international treaty (Ramsar). There are several reasons for this, including: it is valuable, unique, and not recoverable if lost. Most of PEI's coastal marine environment shares this fragility. Our natural areas are currently stressed by the pressures of population and have minimal disaster-recovery potential. Methodologies must present a reasonable guarantee that releases will not occur.
- **Response:** Using the Deepwater Horizon oil spill as a learning experience, it is clear that a pre-emptive response plan that addresses specific remediation procedures is required. Materials, staff, equipment, communication channels, and technology must be listed, available, deployable, and well understood.
- **Liability:** Island experience demonstrates that intrinsically dangerous undertakings are ineffectively regulated just by restricting methods and actions. Owner/operators must be held strictly liable for damages – regardless of culpability. Harm caused must be the single required offense necessary for establishing wrongdoing.
- **Financial capacity:** Owner/operators must be required to provide proof they will have sufficient funds to comprehensively pay for clean up, compensate stakeholders for losses, and fund economic recovery efforts. This will be particularly expensive on PEI because it is densely populated and highly dependent on marine resources. (Fishing and tourism comprise a substantial portion of the Island's gross domestic product. PEI Thirty-eighth Annual Statistical Review, 2011, PEI Statistics Bureau.)

In some cases our concerns may not appear to be within the scope of an SEA. However, for clarity to the public and to be consistent with SEA update objectives, they should be documented in the assessment, together with reference to the legal code that addresses the concern.

C-NLOPB will need to redouble its public consultation efforts once the

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substance of the draft SEA is available. Our board requests that you add our organization to your distribution list. Additionally, there are other stakeholder groups and environmental scientists that should be explicitly recruited for the review task. Our experience with similar processes taking place on PEI is that when stakeholder consultation is actively and effectively pursued, local ownership of outcomes replaces reactive outcries.

Note: We request your permission to release this email thread, in its entirety, to members of legislature, government servants, sector leaders in PEI, C-NLOPB management, and our membership. We will add an explanatory narrative prior to forwarding.

On 12-11-29 11:15 AM, Bonnell, Steve wrote:

Hello Mark -

Thanks for your email and these questions. We are preparing an update of the SEA that was originally completed for the Western NL Offshore Area in 2005. AMEC has been retained by the C-NLOPB to complete the SEA Update.

The consultation sessions that we conducted throughout Eastern Canada in October were to generally describe the process and to seek to obtain an updated understanding of public and stakeholder questions, issues and perspectives on this matter, to help scope and focus the SEA Update - not to present the results of the SEA Update as you've correctly noted.

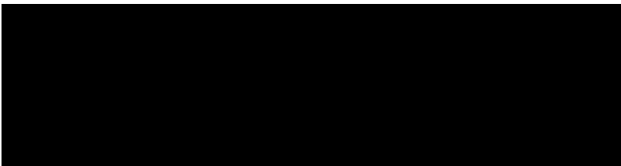
The "feedback form" was provided as one means of allowing participants and others to submit information and input to this early SEA consultation process (as a general guide). Interested persons are free to provide comments and input (questions / issues for consideration in the SEA update) in any format they wish. There is no firm deadline, although we have been seeking initial input asap (say by Dec 1st) for inclusion in the first Draft.

That being said, however, the Draft SEA will indeed eventually be released for public and stakeholder comment once available, likely in early 2013. The C-NLOPB will be coordinating this process, including the report's posting, announcements, the timing and duration of the review period etc, and can best advise you on the planned nature of that process (I have copied the responsible C-NLOPB reps here).

Thanks again for your inquiry, and I hope that this information is helpful to you.

All the best;
Steve

Steve J. Bonnell
Associate and Practice Leader
Environmental Assessment and Regulatory
AMEC
Environment & Infrastructure



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Quality Management System (St. John's)

Re Western Newfoundland/Labrador SEA

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From: Mark Bishop [REDACTED]
Sent: Thursday, November 29, 2012 10:01 AM
To: Bonnell, Steve
Cc: [REDACTED]

Subject: Western Newfoundland/Labrador SEA

Hello Steve,

Our organization and our membership have an interest in the active Western Newfoundland and Labrador Offshore Area Strategic Environmental Assessment project.

An update was presented in Charlottetown on October 10th. I assume this "update" is not the Draft SEA Report, but simply a description of the initiative. Is this a fact?

There is a Comment/Feedback form on the website for the Canada-Newfoundland and Labrador Offshore Petroleum Board that identifies you as the receiver of comments. Is this comment form for comments on the update presentation or on the, as yet, unreleased Draft SEA Report?

As for the Draft Report, when will it be released for public comment and when does the comment period close?

Mark Bishop
Chairperson, Prince Edward Island Watershed Alliance

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