



Scott Tessier, Chairman and Chief Executive Officer
Canada-Newfoundland and Labrador Offshore Petroleum Board
5th Floor, TD Place
140 Water Street
St. John's, NL A1C 6H6
information@cnlopb.nl.ca

Dear Sir,

We are a recently-retired couple, who moved to Rocky Harbour 25 years ago and have chosen this as our permanent home. In our professional lives, we worked as biologists and environmental educators. Over the last few decades we have participated in the development of the Gros Morne area, as a sustainable tourism destination based around marine and coastal experiences. Oil and gas activities do not meet the criteria of sustainable development, and any such industrialization would be counter-productive to the goals of social and economic development in this region.

We attended the consultation meeting in October 3, 2012 for the Western Newfoundland and Labrador Offshore Area Strategic Environmental Assessment Update, and also submitted comments to the C-NLOPB in letters dated Dec 2nd, 11th and 15th, 2012.

Upon reading the Draft Report (SEA) prepared by AMEC, we were disturbed at the absence of conclusions regarding use of hydraulic fracturing nor any recommendations that would protect the integrity of Gros Morne National Park and UNESCO World Heritage Site.

Given the recent development of the various techniques of high-volume slick-water fracking, a fuller discussion of the issues and documentation of the risks would be appropriate. Accidental spills, whether of hydrocarbons, drilling mud, or other wastes, are acknowledged as risks of oil and gas activities. Why are specific fracking-related risks (spills, chemical leakage, gas migration) and onshore impacts (water consumption, waste disposal, traffic, noise, lights, air pollution) omitted? In the SEA Update, these risks are minimized, despite concerns raised by Canada's Commissioner of Environment and Sustainable Development and investigations by the USA Environmental Protection Agency(EPA).

Also lacking is an acknowledgement of the health and social effects of these developments. Perhaps because of the offshore oil focus, this was deemed not relevant. But onshore to offshore drilling has been proposed for areas of the west coast, including within and in proximity to settled areas, therefore recommendations for planning and management are needed. Furthermore there are distinct worker health and safety issues associated with fracking. While the SEA may not be the place for a full analysis of health issues, we urge the C-NLOPB to recommend that a science-based health impact assessment be an essential requirement prior to the issuing of licenses in settled areas.

We do commend the report for recognizing that “...*there is a need for further consultation and discussion with interested and potentially affected communities, individuals and organizations regarding hydraulic fracturing and its potential effects particularly if future projects involve the use of this technology...*”. This should form the basis for a recommendation in the final report.

A pre-requisite to further oil and gas exploration in the Gulf of St. Lawrence should be the completion of a network of marine and coastal protected areas. While this may further restrict the areas available for future oil and gas exploration, it will also enable Canada to meet international biodiversity and conservation targets for protected areas, before allowing oil development to proceed. While the report identifies Areas of Interest under DFO’s Marine Protected Area system, candidate sites under Parks Canada’s National Marine Conservation Area are not illustrated (southwest coast of Newfoundland, the Magdalen Island Shallows, and an area between Mingan Islands and Anticosti Island.) As has already been described in earlier correspondence, world-class protected areas can help achieve conservation, social and economic goals.

Given the inter-dependence of the Gulf of St. Lawrence, what is still missing is an overall Gulf-wide Strategic Environmental Assessment. With five provinces potentially affected by decisions on future oil and gas development in the Gulf, planning and decision-making needs to be integrated, both for efficiency and for the long-term health of the environment.

Despite its weaknesses, the report presents a remarkable portrait of the Newfoundland portion of the Gulf and clearly demonstrates:

- Biologically important habitats in western Newfoundland’s part of the Gulf, vital to the overall Gulf ecosystem’s health;
- Vulnerability and sensitivity of the Gulf ecosystem to spills and seismic activity;
- Lack of research confirming the effectiveness of standard mitigation measures;
- Value and diversified economic activities in fisheries and tourism, and

- Important protected areas adjacent to potential oil exploration sites that would be impaired by industrialization.

For these reasons, and because the consultation program revealed that there is considerable public concern about short and long-term threats to health, livelihood, and quality of life, we urge the C-NLOPB to:

- Defer issuing any new exploration licenses in western Newfoundland offshore area;
- Cancel the call for bids issued on May 16th 2013 for four parcels in the Newfoundland offshore area;
- Recommend a terrestrial and marine buffer zone for oil and gas exploration around Gros Morne National Park;
- Refrain from further authorizations to projects currently submitted in the Gulf of St. Lawrence;
- Recommend the completion of a protected area network including candidate NMCAs and MPAs;
- Identify the need for a health impact assessment as a requirement prior to the issuing of licenses in settled areas; and
- Invite public review of recommendations and conclusions prior to the release of the final SEA report.

We urge you to consider these points as you compile the final report.

Sincerely,



Anne Marceau and Michael Burzynski

CC: Premier Kathy Dunderdale, premier@gov.nl.ca
Hon. Tom Hedderson, thedderson@gov.nl.ca
Hon. Tom Marshall, tommarsall@gov.nl.ca