

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

September 26, 2013

Mr. David Burley, Manager, Environmental Affairs
Canada-Newfoundland and Labrador Offshore Petroleum Board
5th Floor, TD Place
140 Water Street
St. John's, NL
A1C 6H6

Dear Mr. Burley,

On behalf on the Corner Brook – Rocky Harbour Regional Council of the Rural Secretariat, we are writing to highlight our Council's perspectives with regard to the Draft Strategic Environmental Assessment (SEA) Update for Western Newfoundland. We wrote earlier (December 14, 2013) to provide input to the process and outline our concerns, especially with regard to the issue of hydraulic fracturing as a method of oil exploration in the Gulf of St. Lawrence.

Our understanding is that the SEA report will be a tool for the C-NLOPB to evaluate whether or not to go ahead with issuing offshore exploration licenses in the Gulf of St. Lawrence (including the offshore portion of onshore-to-offshore drilling operations) and what the required conditions and mitigations should be.

With regard to the draft SEA, we recognize the efforts that have gone into the process. The following factors were identified in the report:

1. The prevalence of sensitive and biologically important zones (which basically encompass most of the Newfoundland shores of the gulf); these areas are important for such species as cod, redfish, plaice, herring, capelin, lobster and krill;
2. The socio-economic importance of fishing and tourism activities in the gulf;
3. The knowledge gaps that exist with regard to commercial and non-commercial fish species and sea-birds, and the impacts of oil and gas activities on these species;
4. The risks of oil spills that are inherent in the industry, and the widespread and disastrous effects that an oil spill could have on fishing and tourism industries, both directly and indirectly due to negative publicity;
5. The high level of public concern around the issue of hydraulic fracturing, to the extent that more consultations and independent analysis are required before allowing this type of exploration and extraction to proceed;
6. The fact that although many mitigation measures can be identified, the effectiveness of some of these measures requires further study.

In light of all of these factors, we feel that the CNLOPB should:

1. Defer the issuing of any new exploration licenses in the Newfoundland offshore area;
2. Cancel the call for bids issued on May 16th 2013 for four parcels in the Newfoundland offshore area;

3. Refrain from giving authorizations to projects currently submitted in the Gulf of St. Lawrence, including Corridor Resources' Old Harry project or Shoal Point Energy and Black Spruce Exploration's Western Newfoundland drilling program; and
4. Submit to public scrutiny the recommendations and conclusions of the final SEA report.

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,

Joan Cranston, Regional Council Member
On behalf of Colleen Kennedy, Chair
And Carla Wells, Acting Chair

Darren Hicks, Environmental Analyst

Elizabeth Young, Environmental Analyst Officer

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