

27 September, 2013

Scott Tessier, Chairman and Chief Executive Officer  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
5<sup>th</sup> Floor, TD Place  
140 Water Street  
St. John's NL A1C 6H6  
[information@cnlopb.nl.ca](mailto:information@cnlopb.nl.ca)

Re: Western NL SEA Update - Draft document

Dear Mr. Tessier,

The Coastal Landowners Association of Western Newfoundland is a group of property-owners, centred on the Bonne Bay area, who have concerns related to oil and gas exploration and development. Our membership includes elders with impressive stores of traditional and regional knowledge, fishermen, health and education professionals, artists, retired and practising scientists, and operators in the service industries, particularly tourism. We share a common interest in protecting our communities, culture, livelihood and lifestyle.

We are pleased that AMEC has recognized the opposition and concerns expressed in the five provinces that all but surround the Gulf of St. Lawrence, and that this document recognizes the fragile, diverse nature of ecosystems in the area and their vital importance to communities whose main sources of income are the fishery and tourism. However the draft SEA update has several inadequacies including some "fatal flaws" that make it, in our opinion, unacceptable as it is.

- The research (as identified under "References") is still not as diverse (mostly DFO and AMEC reports) or as up to date (heavily weighted to earlier references) as we feel it should be. More current, independent research is needed. To make this document adequately functional, there would have to be a constant collection and updating of data for immediate addition to it.
- Critical data gaps, such as information on plankton and early life histories of commercial species, still need to be filled.
- Tourism, the main private sector industry on the West Coast, has been given minimal consideration in the draft SEA Update. This vital, growing, and sustainable industry is interdependent with the fishery, and both industries are known to suffer severe setbacks when pollution occurs, or even the rumour of it. Well-pads may be short but they throw long shadows, and the "branding" of Gros Morne and the West Coast as unspoiled natural areas would disappear in the event of an oil spill from Old Harry, or if fracking were allowed. Many travellers have said they will go elsewhere if fracking is licensed.
- The fishery is also vulnerable to public perception. With just a suggestion of pollution, fishermen dealing with rock-bottom prices would see them drop still lower, forcing the end of the heritage industry in our area. Underwater seepage of toxins related to drilling

and fracking would not be detectable till crustacean and fish spawning beds and nurseries were seriously damaged, causing die-off and/or mutations. Old Harry lies below an important spawning area of the migratory cod, which are the hope of the species, as they can revive areas where stocks of sedentary cod are now extinct in the Gulf of St. Lawrence.

- There is no mention of the inevitable damage to social systems and communities. Coastal cultures such as those on the West Coast of Newfoundland are intimately interconnected with the marine environment. The whole fabric of culture would be at risk, even without a single accident. Note the frequency of armed robberies in St. John's: the inequalities caused by the "resource curse" would create a virtual annihilation of local and regional culture, and be the death of our communities as we know them.
- Public health is not mentioned nor included in mitigation plans. Health problems are typically related to flaring, spills, seepage, and contamination or loss of drinking water.
- Toxic fluids reaching the seabed would be concentrated through the marine food chain, in fish and crustaceans normally enjoyed by residents. The kelp (rockweed) we spread on our gardens could contaminate our crops. Contamination of the Gulf thus would decrease food security in a region vulnerable to shortages due to our geographic location.
- The section on hydraulic fracturing is very weak. "Fracking" is not adequately dealt with, and could not be regulated under the current system, as oil & gas companies are not required to reveal the substances they use in drilling and fracturing. Baseline studies (testing for named chemicals before any oil and gas activity has taken place) cannot be effective, under this regime, in protecting residents' properties and health.
- Mitigation measures are not well known as to how effective they would be. Intervention would be dangerous for first responders, not knowing what chemicals could be present and thus what safety procedures and protective measures they should use.
- Where would the intervention come from in case of a spill, and how long would it take to arrive on site? Who would pay for damages, over how long a period, and would the amount be increased to a realistic amount?
- Finally, this draft SEA Update comes to no conclusion and has no recommendations. It seems unfair and unwise for the oil and gas industry to be responsible for co-developing the conclusions and recommendations on a document that is designed to be a critical factor in its regulatory systems. Without conclusions and recommendations the document cannot be meaningfully reviewed and commented upon. For these reasons, when the SEA Update is complete, there must be a further round of public consultations.

As a final recommendation, we propose that no new exploration licences be issued in the Newfoundland offshore area; that the call for bids issued May 16, 2013 for four parcels of land in the Newfoundland offshore area be recalled; and that no authorizations be given for projects currently submitted in the Gulf of St. Lawrence, including Black Spruce Exploration and Shoal Point Energy's Western Newfoundland Drilling Program and Corridor Resources' Old Harry, until after the recommendations and conclusions of the final SEA Update have been subjected to public scrutiny.

Thank you for your consideration,

  
Karole Pittman

on behalf of the Coastal Landowners of Western Newfoundland