



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

Dear, Ms Young,

I am writing to respond to the publicly released draft of the Western Newfoundland and Labrador Offshore Area Strategic Environmental Assessment (SEA) Update report. I would like to thank you for providing an opportunity to respond to this important and influential document.

The SEA Update report provides a clear picture of the current offshore oil and gas industry in Newfoundland/ Labrador and some of the potential impacts of an expansion in offshore drilling along Newfoundland's west coast. However, this report continuously downplays the actual risks of offshore drilling in the Gulf of Saint Lawrence and contains several omissions including no discussion of the environmental impacts of dispersants or the impacts of sea ice and high winds on oil spill response effectiveness. Regarding the environmental impacts of chemical dispersants, particularly Corexit, the SEA Update report does not discuss these despite its claim to do so and despite the fact that new research suggests when Corexit becomes mixed with oil the toxicity of the mixture increases up to 52-fold (see [http://www.huffingtonpost.com/2013/04/23/corexit-oil-spill-gulf\\_n\\_3134963.html](http://www.huffingtonpost.com/2013/04/23/corexit-oil-spill-gulf_n_3134963.html)).

Regarding responses to large and small spills of oil and other contaminants in the Gulf of Saint Lawrence, the SEA Update report does not discuss factors limiting these responses including seasonal high winds, waves and sea ice. In particular, the unusual obstacle of seasonal sea ice to offshore spill clean-up activities is not addressed. Research on the effectiveness of oil spill clean-up activities suggests that under even under ideal weather conditions only a small percentage of the spilled oil can actually be removed from the water. With this caveat in mind it is by no means clear that offshore operators have the means to effectively clean up an oil spill when high winds or sea ice are present. The failure of the SEA Update report to address this issue is a large oversight and should be rectified.

Public comments in the SEA Update report are not clearly presented, obscuring the fact that public concerns around offshore development in the Gulf are widespread. Of the 516 comments from the consultation sessions in the draft Consultation Report (Appendix A), only eight (8) could be considered to be supportive of offshore development in the Gulf. Surprisingly, this lack of social license to drill in the Gulf is not addressed and does not appear to be taken into consideration in the draft SEA Update report.

Finally, the omission of a conclusion gives the public no opportunity to comment on AMEC's recommendations on future offshore drilling activities in the western Newfoundland region before they are finalized. This appears to be a clear attempt to limit meaningful public comments (including those from knowledgeable academics and scientists) on the most important segment of the SEA Update report; namely, AMEC's recommendations on future offshore activity after a comprehensive review of the facts.

I thank you for the opportunity to comment on the draft SEA Update report and hope that AMEC and the NLOPB consider seriously the oversights and omissions pointed out by myself and others.

Sincerely,

Colin Jeffrey