

## Norris, Sara

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**From:** Hugh McCormack [REDACTED]  
**Sent:** Friday, September 27, 2013 4:46 PM  
**To:** Information  
**Subject:** Public response to Western NL Offshore area SEA - Draft

Good day,

I have spent some considerable time reviewing the CNLOPB's Draft of the Strategic Environmental Assessment for the offshore area off Western Newfoundland. I note that there is an opportunity for public commentary on the report and I wish to take that opportunity via this email. I understand that my feelings, and those of other respondents, will be considered by the CNLOPB in directing the completion of the final report and, also, in making decisions about licensing offshore oil and gas exploration.

In reading the report I see that AMEC has identified that two sectors (the fishery and tourism) of the Newfoundland economy are essentially equal contributors at approximately \$1B per year. Both are sustainable in the long term if managed carefully and correctly. Oil and gas production, regardless of its scope, is not, and I am concerned for a number of reasons as follows.

The AMEC draft SEA identifies many areas and species of environmental significance within the assessment area. There are individual maps that illustrate the general locations of some of these but there is no single map that illustrates all of these areas on one page. This is a weakness in information presentation because it tends to make the individual significant areas look insignificant in size when compared to the overall area of the SEA study area. In fact, I believe that by compiling the significant areas and species ranges onto one map, in addition to having individual maps for discussion purposes as at present, it would illustrate just how much of the offshore area is environmentally significant.

The AMEC draft SEA indicates that there is a range of knowledge, and also gaps in the knowledge, about many aspects of the environment and the ecology of the Gulf of St. Lawrence. This is of concern to me because decisions on environmental impact and mitigation will be based on potentially incomplete background information. This is of particular concern in terms of assessing risk and balancing risk versus potential benefit. When one takes into account that exploitation of a non-renewable resource could have unknown impacts and have unknown mitigations it makes this lack of knowledge of even greater concern to me.

I am also concerned about the amount and quality of data and the analysis of the data collected by AMEC in the production of the report. One example that stood out to me was the table on page 379 that refers to cruise ship visits within the study area. It provides data for only one year (2012) and indicates that Corner Brook is the port receiving the greatest number of ship visits. While the ship visit numbers are not at issue what is not apparent from the data is that several of the ships visiting at Corner Brook offer bus trips to the Bonne Bay/ Gros Morne area. Thus the importance of Corner Brook as a destination that the data implies, is not actually a true representation of the situation that we experience here in the Bonne Bay area.

The AMEC report discusses hydraulic fracturing as a means to recover oil from the undersea rock in the area. In response to public pressure, AMEC has indicated that there is a need for more discussion and a greater understanding of this technique before permitting it to take place in the Gulf. I couldn't agree more. I hope that the CNLOPB takes this into consideration before issuing any permission to "frack" to any of the license holders in the area encompassed by the AMEC report.

I am surprised that, for the size of the document, that AMEC has not included a conclusion nor any draft recommendations and I have some difficulty with this. I, as a member of the public, have been invited to comment on an incomplete document. I think it is unfortunate that AMEC has not included any recommendations for review and discussion.

As I noted above, AMEC has identified tourism and the fishery as two equal contributors to the Newfoundland economy. I also note that they have said that roughly \$30M of the annual tourism contribution stems directly and indirectly from Gros Morne National Park. I can't comment on the contribution of the local fishery to the overall number of \$1B for that sector because that figure is not provided. I am willing to accept that it will be of a similar proportion to the contribution made by

Gros Morne. Given the significance of these two sectors of the economy (both local and provincial), why then would the CNLOPB consider engaging in licensing activities related to a finite and non-renewable resource when there is so much else at stake, when there are large gaps in the knowledge of both the environment and ecology of the area as well as poorly understood potential impacts of oil/gas exploitation on both the environment and key parts of the provincial economy?

For these reasons I am requesting that the CNLOPB place a moratorium on oil/gas exploration and development licensing in the Gulf off the western shores of Newfoundland until such time as it, and the public, is better informed about the true consequences of the oil/gas exploration and extraction activities on the environment and the economy.

Sincerely,

Hugh McCormack  
