

Mr. David Burley, Manager, Environmental Affairs
Canada-Newfoundland and Labrador Offshore Petroleum Board
5th Floor, TD Place
140 Water Street
St. John's, NL
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September 27, 2013

Dear Mr. Burley,

I am writing to express my perspectives on the Draft Strategic Environmental Assessment Report for the Western Newfoundland offshore area. As a resident of Bonne Bay, in Gros Morne National Park, I have been involved in community and regional social and economic development at many levels. I am a health professional so I have an awareness of public health concerns as well. I attended the AMEC SEA consultations in Rocky Harbour on October 3, 2012. Over the past few months I have consulted with many people including community members, fishermen, tourism operators, municipal representatives, educators, geologists and researchers. I have reviewed the Draft SEA report and I would like to provide my input.

When considering any potential development, one must weigh the risks and potential benefits to the communities that will be affected. Therefore, I would like to raise the following concerns, many of which were high-lighted in the report:

- **From an environmental perspective** – risks to the sensitive, biologically important, pristine, subarctic, highly productive marine environment of the Gulf of St. Lawrence; risks to the 2000 species of marine life and migratory birds (including some species at risk) that inhabit the waters of the gulf; risks to the shorelines and coastal communities.

- **From an economic perspective** – risk of damage to existing industries in the gulf; **commercial fisheries** are currently valued by DFO at 1.5 billion/ year in the gulf; \$35 million in this area (Trout River to St. Barbe; source RED Ochre Regional Economic Development Board); **tourism** is valued at \$35 million and employs over 1300 people in the Gros Morne area alone; \$205 million in Western Newfoundland (source Tourism Research office, government of Newfoundland and Labrador); the figures are much higher when you include the value of the tourism industries in all of the 5 provinces that border the gulf. These are long-term sustainable jobs that help to sustain coastal communities. Another economic risk is the question of who pays for environmental damages and the loss of existing industries. Current regulations limit liability to \$30 million dollars, but as was seen in the recent spill in the Gulf of Mexico, damages can cost tens of billions of dollars. Recently in Newfoundland and Labrador taxpayers were deemed liable to pay for environmental cleanup associated with the closure of the paper mill in Grand Falls – Windsor. The provincial government is only now drafting legislation to ensure that taxpayers will not bear this burden in the future. Another economic risk posed by oil and gas development is the damage to infrastructure (roads and highways) posed by transportation of large amounts of oil from production sites to processing facilities. The bridges in Gros Morne National park are within the last five

years of their lifespan. Who will bear the burden of the upgrading of this infrastructure – the industry or the taxpayers?

- **From a public health perspective** – risks to public health arising from oil spills both offshore and onshore arising from contamination of ground water, surface water and seawater; risks to public health associated with the process of hydraulic fracking (this is relatively new technology, the risks are not well-documented and some of the science around the safety of the process has recently come under scrutiny); risks to public health from the transportation of oil and gas and dangerous chemicals used in the fracking process along public roads and highways.

- **From a risk management perspective** – this type of development is going ahead despite the lack of an adequate regulatory framework especially with regard to the process of fracking; recent federal budget cuts have eroded environmental monitoring capacity in the gulf (DFO habitat biologist positions are being eliminated on the west coast of Newfoundland); there is inadequate liability coverage for environmental damage; there is inadequate scientific evidence around the risks associated with fracking. Some provinces, states and countries have placed moratoriums or out-right bans on the process until more is known.

- **From a social and community perspective** – there are risks associated with the loss of long-term sustainable jobs in favour of an industry that supports fewer, less skilled, and less sustainable jobs. Royalties and profits do not tend to “trickle down” to the communities that bear most of the risks and burdens associated with this type of development.

In conclusion, at this point I feel that the potential risks of oil and gas development in the Gulf of St. Lawrence out-weigh the potential benefits to the people and communities that currently depend on this resource. And I feel that there should be a moratorium on any hydraulic fracking anywhere in the gulf until more reliable scientific evidence can demonstrate its safety.

Sincerely,

Joan Cranston

cc. Elizabeth Young, Environmental Assessment Officer, CNLOPB