



Scott Tessier, Chairman and Chief Executive Officer  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
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September 27, 2013

Dear Mr Tessier,

The Western Environment Centre is a volunteer, charitable community organization in Corner Brook whose aim is to engage the west coast region of Newfoundland in discussions and action on environmental, social and economic sustainability.

As we stated in our first submission to the public consultation process of the Strategic Environment Assessment (SEA) Update for the Western NL Offshore Area, we fully support sustainable development in our region.

We were pleased to see the SEA conducted in our region and appreciate the opportunity to be involved. We have a number of suggestions and comments about the draft SEA that we hope you will consider for the subsequent final draft SEA Update.

Overall, we feel that the draft SEA was well-researched and includes extremely valuable information that could help inform a decision on allowing oil and gas development to occur in the Newfoundland western offshore. Background information about biological diversity and sensitivity is crucial, as it is well-recognized that this area is unique and irreplaceable. The comprehensive inclusion of the many comments and concerns of residents during the public consultations was a useful addition to this draft SEA that has been missing from previous SEAs.

However, we do feel that there are some gaps in the draft SEA that could be more fully addressed as outlined below.

- 1) The potential for hydraulic fracturing has become a major public concern. Although the draft SEA includes a small section on the impacts of 'fracking', we think this should be expanded to include more information on the environmental, social and economic effects.

- 2) We would have liked to see an estimate of the carbon emission potential of oil and gas development projects in the Gulf of St. Lawrence.
- 3) Although the likelihood of a spill might be small, the effects could be extremely devastating, not only ecologically but also socially and economically. We feel that the magnitude of destruction of a potential spill was downplayed.
- 4) A stronger evaluation of the effectiveness of mitigation measures would have been useful, as well as more information on the importance of monitoring
- 5) Overall, the socio-economic impacts of oil and gas development were not addressed in the report
- 6) The lack of conclusions and recommendations is disappointing, as these are some of the most important elements of the SEA. We feel that it would be more appropriate to release conclusions and recommendations to the public before the publication of the final SEA Update, and preferably in the draft SEA.

In summary, we would like to make a number of recommendations for action on the part of the CNLOPB, as follows:

- 1) that the call for bids from May 2013 be cancelled;
- 2) that no new exploration licences be issued in the region;
- 3) and that no new authorizations be given to ongoing projects.

We make these recommendations based on the fact that there remains an acknowledged lack of data pertaining to the biological environment, and that the recent report from the Federal Commissioner of the Environment revealed the province's lack of capacity for proper spill response.

Considering that the SEA Update is still not complete and is intended to help guide the decisions about the potential for oil and gas development in the Gulf of St. Lawrence, we feel that carrying out the above actions would contribute to the integrity of the SEA Update process.

Sincerely yours,

Simon Jansen, Chair



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