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January 18, 2012

*RE: Draft Scoping Document for Western Newfoundland and Labrador Offshore Area  
Strategic Environmental Assessment Update*

To whom it may concern:

Firstly, we are profoundly disappointed and discourage that the C-NLOPB, the National Energy Board and the Government of Canada have failed to grasp the irrevocable long-term alteration that offshore oil and gas development could create in our Gulf of St. Lawrence, which sustains hundreds of coastal communities and tens of thousands of jobs through its renewable fishery and tourism industries.

Please accept the following comments in response to the Draft Scoping Document for Western Newfoundland and Labrador Offshore Area Strategic Environmental Assessment Update on behalf of Sierra Club Canada – Atlantic Canada Chapter and the Save Our Seas Coalition.

As a participant in the Coalition St. Laurent, we support and recommend implementing comments made by the Coalition on the Draft Scoping Document. In addition, we wish to make the following comments on this environmental assessment.

We do not believe the C-NLOPB's mandate gives it the authority or expertise to determine the risks and impacts of oil and gas for the entire Gulf of St. Lawrence, which includes the coastline of five provinces.

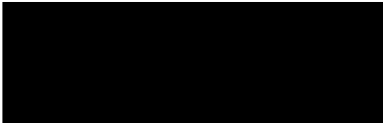
We also believe that the C-NLOPB is in a conflict of interest position when it comes to promoting oil and gas and regulating safety and ensuring environmental protection. This position is supported by the findings of the Wells Commission on Offshore Safety. The Senate Committee on Energy, the Environment, and Natural Resources has

recommended that the possible conflict of interest position of offshore boards be “explored” (Recommendation 2 of the Senate report on deep sea drilling states: “The committee recommends exploring in greater detail the structure and role of the off-shore petroleum Boards to determine whether there may be in fact a material conflict between regulatory roles. “). Until this regulatory conflict of interest is resolved, we do not believe the current assessment process will be adequate.

*Recommendation: In order to determine if oil and gas exploration and development can be developed safely in the Gulf, we recommend (as requested by the C-NLOPB in its letter to the Federal Minister of Environment, dated June 3, 2011) that a mediator or review panel be struck by Environment Canada. This panel would need to respect the jurisdictions of all five provinces and the federal government for protecting the Gulf ecosystem, as well as federal obligations to consult with indigenous people.*

In the interim, we believe that the exceptional ecological significance of the Gulf of St. Lawrence and its contribution to the economies of this region justify establishing a moratorium on oil and gas development in the Gulf of St. Lawrence.

Sincerely,



Gretchen Fitzgerald  
Director

*CC: Prime Minister Stephen Harper*

*Environment Minister Peter Kent*

*NL Premier Kathy Dunderdale*

*NS Premier Darryl Dexter*

*PEI Premier Ghiz*

*NB Premier Alward*

*PQ Premier Charest*