



Environmental Health Programs (EHP)  
Regulatory Operations and Enforcement Branch, Health Canada  
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February 21, 2020

Regional Assessment Committee  
c/o Impact Assessment Agency of Canada (IAAC)  
301-10 Barters Hill  
St. John's, NL A1C 6M1

Subject: Health Canada's response to the Regional Assessment of Offshore Oil and Gas  
Exploratory Drilling East of Newfoundland and Labrador Project draft Report

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To The Regional Assessment Committee:

Health Canada (HC) is participating in the Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador Project as a Federal Authority under the *Impact Assessment Act*.

As requested by the Regional Assessment Committee on January 23, 2020, HC has undertaken a review of the Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador Project draft report (the draft RA Report) related to HC's following areas of expertise:

- human health risk assessment,
- human health impacts from noise,
- contamination of country foods, and,
- air quality health effects.

HC notes that the draft RA Report does not respond to concerns raised by Indigenous groups and/or organizations regarding potential contamination of marine species due to possible accidents and malfunctions (such as spills of crude oil). Through the RA process, Indigenous communities have indicated they rely on these species for food, social, ceremonial and economic purposes.

It is recommended that the draft RA Report include consideration of potential impacts to human health associated with consumption of marine species that may be contaminated by spilled oil and/or dispersants. As stated in the draft RA Report, Indigenous groups and/or organizations have expressed concerns regarding the "*Potential effects of oil spills on marine biota and human health*". Although there are no documented Food, Social and Ceremonial (FSC) licenses within the RA study area, the draft RA Report indicates that Indigenous groups fish for migratory species under their FSC licenses in waters adjacent to and near the RA study area. Fish species migrate through these waters and may spend a significant part of their life in parts of the RA study area, while being caught in adjacent waters. In addition, Indigenous groups hold Fisheries and Ocean Canada commercial fishing licenses within Northwest Atlantic Fisheries Organization Divisions that overlap

with the RA study area. Therefore, a spill in the RA study area has the potential to impact marine species that Indigenous communities rely on for food, social, ceremonial and economic purposes.

The draft RA Report does identify that offshore spill response and mitigation tools and strategies are established. These may include surveillance and monitoring, mechanical containment and recovery, chemical dispersion, in-situ burning, natural dispersion and degradation, and shoreline protection and recovery. It is recommended that as part of spill response and mitigation plans, COPCs should be identified and sampling and monitoring plans developed for country foods and marine species important to Indigenous persons. The results of these sampling and monitoring plans may inform decisions to mitigate, if necessary, potential risks to human health.

If you have any additional comments or questions, please contact Sara Rumbolt, Regional Environmental Assessment Specialist at [sara.rumbolt@canada.ca](mailto:sara.rumbolt@canada.ca) or (902)-943-1962 at your convenience.

Sincerely,

<Original signed by>  
CHANTAL ROBERGE

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