

The Hon. Jonathan Wilkinson
House of Commons
Ottawa, Ontario
Canada, K1A 0A6
Email: Jonathan.Wilkinson@parl.gc.ca

February 21, 2020 (VIA EMAIL)

Dear Minister Wilkinson,

RE: Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador

Northeast Avalon Atlantic Coastal Action Plan (NAACAP) is a community advocacy group that promotes the science-based advocacy for conservation of coastal environments and wetlands on the Northeast Avalon Peninsula of St. John's, NL. As the Minister responsible for the Impact Assessment Act (IAA), NAACAP recognizes your authority regarding the Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador (RA).

The draft recommendations released by the Regional Assessment Committee on December 4th contain cursory references to the effects of offshore exploration and drilling on water quality, but fail to include even qualitative references to any specific metric of marine water quality; i.e. water temperature, turbidity, salinity, or pH. Given the potential of this RA to pre-empt or supersede project and site-specific environmental assessments (EAs), there is a requisite rigour that must be applied to the process. The draft recommendations do not meet, let alone exceed, the current mandate of existing EAs.

The paucity of references to water quality is indicative of the broader shortcomings of the current draft recommendations with respect to the assessment of the effects of offshore exploration and drilling. References to atmospheric effects and cumulative effects are similarly cursory, and effects related to climate change are omitted entirely from the draft.

NAACAP wishes to echo the suggestion of other environmental organizations, that the Committee be given the time and resources befitting the scope, precedence, and potential ramifications of this assessment.

Sincerely,
Nick White

<Original signed by>



Past-Chair
Northeast Avalon Atlantic Coastal Action Program

CC:
The Regional Assessment Committee