

Mr. Morin,

On behalf of Nature Newfoundland and Labrador (<http://naturenl.ca/>), please allow me to submit a short brief to the Frontier and Offshore Regulatory Renewal Initiative.

The operating area for the offshore oil industry in NL falls within a globally important seabird “biological hotspot” (see <http://www.marineornithology.org/content/get.cgi?rn=1133>). In fact, the “...health of the marine ecosystem off Newfoundland and Labrador is important for seabirds from the entire Atlantic Ocean” (see <http://www.dfo-mpo.gc.ca/Library/342998rank66.pdf>). In the summer months, seabirds including Atlantic Puffins, Common Murres, Northern Gannets and Leach’s Storm Petrels from huge colonies around the Island of Newfoundland frequent the area to feed. Seabirds from the southern Atlantic gather to moult and rebuild their fat reserves. Shearwaters, Thick-billed Murres and other species accumulate to moult later in the year, as well. In the winter, up to 14 million Dovekies overwinter in the region.

For decades, repeated calls for effective monitoring have been largely ignored by the CNLOPB (see <http://www.cbc.ca/news/canada/newfoundland-labrador/cnlopb-unfit-for-environmental-regulation-scientist-1.4198859>). Two distinct issues arise with the offshore oil industry. First, relatively “small” spills can still affect hundreds of seabirds because only a drop of oil the size of a dime is necessary to destroy the waterproof integrity of seabird feather structure. Second, the “flares” emitted from oil platforms attracts seabirds, especially Leach’s Storm Petrels (see [http://www.opc.ca.gov/webmaster/\\_media\\_library/2016/01/Wiese-et-al-2001-offshore-lighting-and-seabirds.pdf](http://www.opc.ca.gov/webmaster/_media_library/2016/01/Wiese-et-al-2001-offshore-lighting-and-seabirds.pdf)). These seabirds become disorientated and many perish. If these bird mortalities occurred on land where they could be seen, the consequences would be much more significant for the industry (see <http://www.cbc.ca/news/canada/edmonton/syncrude-to-pay-3m-penalty-for-duck-deaths-1.906420>).

CNLOPB’s consistent and chronic dismissal of these issues only protects the industry, not our environment. Environmental regulatory functions cannot be trusted to this organization but must remain in the domain of the Crown.

Sincerely,

Douglas Ballam

President, Nature Newfoundland and Labrador

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