



June 28, 2024

Impact Assessment Agency of Canada
Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador

Re: Oceans North Comments on the Follow-up Program Report for 2023-2024

Oceans North is providing comment on the Follow Up Program Report for 2023-24 which tracks and reports on the progress of the commitments outlined in the Ministerial Response to the Regional Assessment Committee's Report.

Overall, the report requires more detail regarding the performance measurement of the desired outcomes of the RA Follow Up Program. Table 1 shows the outcomes, indicators, and targets for the follow up program performance measurement. However, the indicators listed are missing the details of *how* we understand these outcomes have been achieved. The indicators of success need to be explicit and detailed, especially as reports from the existing project start to emerge in the coming years.

For example, the Program Outcome of “New and emerging information is considered in decision-making” is supported by an indicator of “GIS Tool continues to be updated and is used to inform decision-making for exploratory drilling projects.” This is not an indicator, as an indicator is a way to quantitatively understand the achievement (or not) of an objective. We suggest creating another column with measurable indicators. In this case, an indicator could be the number of times the GIS Tool was referenced within an impact assessment or in a report. Without these specific indicators, reviewers of this report must believe that the actions listed in Table 1 have occurred. The purpose of the report is to show that these actions have taken place.

It is good to see the integration the cumulative effects commitments into larger Marine Spatial Planning initiatives in the province. During this MSP development, we encourage that the IAA

continue its focus on how these initiatives will be useful to a proponent that will apply for an exemption under the Regional Assessment.

Thank you for the opportunity to comment on the Follow Up Report.

Best regards,

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