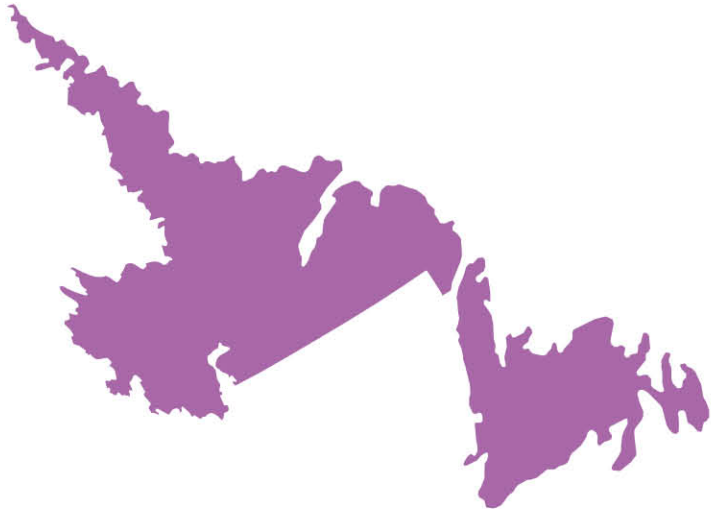




Redistribution
Federal Electoral Districts

Redécoupage
Circonscriptions fédérales



Proposal of the Federal Electoral Boundaries Commission for the Province of

Newfoundland and Labrador

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Boundaries Readjustment Act*

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Introduction

The Federal Electoral Boundaries Commission for the Province of Newfoundland and Labrador (the Commission) was established by Order in Council of the Federal Government on November 1, 2021. It was established under the authority of the *Electoral Boundaries Readjustment Act*, R.S.C. 1985, c. E-3 (the Act).

The Commission has three members: Dr. Amanda Bittner, a political science professor at Memorial University, and Ms. Julie Eveleigh, of Comfort Cove, both appointed by the Speaker of the House of Commons, and Mr. Justice Alphonsus Faour of the Supreme Court of Newfoundland and Labrador, appointed by the Chief Justice of Newfoundland and Labrador. Justice Faour acts as Chair and Dr. Bittner as Deputy Chair.

The Secretary to the Commission is Ms. Pamela Ryder Lahey, a former chief administrator of the Supreme Court of the province. The geographical consultant is Ms. Karen Ennis of Ottawa.

The mandate of the Commission is to consider and report on the readjustment of the boundaries of the electoral districts of the province after the completion of the 2021 decennial census. This is a process that is undertaken each decade under the authority of the Act to ensure that the population shifts that naturally occur are taken into account in the setting of the boundaries and population of each district.

Across Canada, a separate commission in each province is charged by the Act with leading a process that includes the following elements:

- The proposal of a new electoral map for the province by considering a variety of criteria, including average population numbers, communities of interest and identity, the historical patterns of an electoral district and the geographic size of electoral districts;
- Consultation with people in the province through public hearings and other forms of feedback;
- The submission of a report and proposal of an electoral map to the House of Commons;
- Consideration of objections from members of Parliament (MPs);
- The finalization of a report setting the electoral boundaries for the province.

While the Commission is directed by the Act to consider the input received from Canadians and Parliamentarians when preparing its final report, as an independent body it is the Commission that makes the final decisions as to the boundaries and their names.

Statement of Principles

One of the first formal decisions following the constitution of the Commission involved establishing a set of principles to guide our deliberations. Consideration was given to the purpose of the redistribution, the direction contained in the Act and democratic principles. A statement was adopted that emphasized the independence of the process and the objectives of electoral integrity, inclusivity and diversity. It reads as follows:

Our duty as a commission is to focus our attention on federal electoral boundaries, and, of course, geography has an important influence on the nature of representation in a province as vast and diverse as ours. While geography, population distribution and the recent census updates are necessarily at the centre of our process, our commission is committed to principles of diversity, equity and inclusion to ensure that all residents of the province have an opportunity to share their thoughts about the nature of political representation of Newfoundlanders and Labradorians in the House of Commons.

The Commission is guided by four key principles in its work.

1. First, the Commission is a non-partisan body committed to independence from political parties and partisan influence in its decision-making process.
2. Second, we are committed to the importance of population equality among all ridings in Newfoundland and Labrador, under the basic principle of “one person one vote,” and we aim to ensure that electoral districts are as equal in size as possible.
3. Third, we are committed to respecting the territorial integrity of diverse communities in the province, including Indigenous communities, municipalities and local service districts, and we will endeavour to ensure that district boundaries do not pass through these communities wherever possible.
4. Fourth, we understand that equity and equality are not the same, and we are committed to reconciliation with Indigenous peoples and to the principles of equity, diversity and inclusion in guiding our work, to ensure that the process is accessible to all residents of the province.

The Commission has endeavoured to reflect these principles in crafting this proposal.

Overview

In preparing its proposal, the Commission takes as the starting point the decennial census. In 2021, the Chief Statistician of Canada reported that the population of the province was 510,550. That represents a small decline in population. The result means that there is no change in the number of seats in the House of Commons for the province. It remains at seven seats.

The Act provides that the population of each electoral district shall correspond as nearly as possible to the electoral quota for the province. The electoral quota is determined by dividing the population, as determined by the decennial census, by the number of seats allocated to each province. In this province, the electoral quota is 72,936 inhabitants per district.

The Act then goes on to set out the factors that must be considered by the Commission in setting the boundaries. It is useful to quote the provisions of section 15 of the Act:

15 (1) In preparing its report, each commission for a province shall, subject to subsection (2), be governed by the following rules:

(a) the division of the province into electoral districts and the description of the boundaries thereof shall proceed on the basis that the population of each electoral district in the province as a result thereof shall, as close as reasonably possible, correspond to the electoral quota for the province, that is to say, the quotient obtained by dividing the population of the province as ascertained by the census by the number of members of the House of Commons to be assigned to the province as calculated by the Chief Electoral Officer under subsection 14(1); and

(b) the commission shall consider the following in determining reasonable electoral district boundaries:

- (i) the community of interest or community of identity in or the historical pattern of an electoral district in the province, and
- (ii) a manageable geographic size for districts in sparsely populated, rural or northern regions of the province.

(2) The commission may depart from the application of the rule set out in paragraph (1)(a) in any case where the commission considers it necessary or desirable to depart therefrom

(a) in order to respect the community of interest or community of identity in or the historical pattern of an electoral district in the province, or

(b) in order to maintain a manageable geographic size for districts in sparsely populated, rural or northern regions of the province,

but, in departing from the application of the rule set out in paragraph (1)(a), the commission shall make every effort to ensure that, except in circumstances viewed by the commission as being extraordinary, the population of each electoral district in the province remains within twenty-five per cent more or twenty-five per cent less of the electoral quota for the province.

The Commission thought carefully about the electoral district boundaries for the seven existing ridings, and it has proposed small adjustments to the boundaries, where necessary, to accommodate population shifts (both up and down: while the population in the province as a whole decreased since the previous census, some districts increased in population, while others decreased). The Commission sought to find a balance between seeking to adhere closely to the electoral quota and ensuring that communities of interest and identity are protected.

A review of the legislated factors brings the Commission to the conclusion that, in the case of Labrador, extraordinary circumstances support a departure from the electoral quota in excess of the 25 percent limit set out in subsection 15(2) of the Act. Since accommodating that departure from the quota will, of necessity, have a significant impact on the calculation in the other districts, this report will address that issue first.

Extraordinary Circumstances: Labrador

Before the redistribution of 1987, Labrador was included as part of a district on the island of Newfoundland. Labrador had been part of the electoral district of Grand Falls—White Bay—Labrador in the 1984 election and all those earlier. In the first federal election in the province (1949), Labrador was included in the district of Grand Falls—White Bay, but its name was not included in the name of the district.

That meant that the population of all electoral districts in the province was more or less equal. Before 1987, various commissions had set boundaries that brought the population of each district close to the mandated quota under the Act. However, following an amendment to the Act in 1986 (see the 1987 report, page 5), a commission was empowered to find that in “circumstances viewed by (it as) being extraordinary,” an exception could be made to adherence to the direction to be as close as possible to the provincial quota. This meant that it was possible to deviate more than 25 percent from the quota if the Commission considered that “extraordinary circumstances” existed.

To summarize, as of 1986, the Act provided that the commission follow these rules:

- The population of each electoral district “shall, as close as reasonably possible, correspond to the electoral quota for the province.”
- The commission may deviate from adherence to the quota, where necessary, to respect a community of interest or identity or to maintain a manageable geographic size for sparsely populated districts.
- Where a commission deviates from the quota, it must ensure a variance of less than 25 percent from the quota.
- The commission may deviate more than 25 percent from the quota where it finds extraordinary circumstances.

Such deviations are permissible if they are deemed necessary to achieve specific goals related to effective representation, including (a) the protection of community of interest and identity, (b) historical patterns and (c) manageable geographic size in sparsely populated, rural or northern regions of the province. The Act requires the Commission to consider these factors in the determination of reasonable electoral district boundaries in addition to the simple math involved in seeking to closely adhere to the electoral quota.

The Commission was also guided by a direction of the Supreme Court of Canada on the meaning of the right to vote contained in the *Canadian Charter of Rights and Freedoms*. Section 3 of the *Charter* reads as follows:

3 Every citizen of Canada has the right to vote in an election of members of the House of Commons or of a legislative assembly and to be qualified for membership therein.

In *Reference re Provincial Electoral Boundaries (Sask.)*, [1991] 2 S.C.R. 158 (the *Carter* decision), the Court held that the purpose of the right to vote is not equality of voting power but the right to effective representation. Justice Beverley McLachlin (as she was then) said, at paragraph 26,

It is my conclusion that the purpose of the right to vote enshrined in s. 3 of the *Charter* is not equality of voting power *per se*, but the right to “effective representation”. Ours is a representative democracy. Each citizen is entitled to be represented in government. Representation comprehends the idea of having a voice in the deliberations of government as well as the idea of the right to bring one’s grievances and concerns to the attention of one’s government representative. ...

The Court determined that absolute parity among voters may detract from the primary goal of effective representation. It determined that factors such as geography, community history, community of interest and minority representation must also be weighed in the drawing of electoral boundaries. Departures from voter parity can be justified on the ground “that they contribute to better government of the populace as a whole” (*Carter*, para. 32).

In our view, the case of Labrador requires an examination of features that make it unique both in this province and in the country as a whole. These factors include its history, its geographic characteristics, its Indigenous populations, its culture and its political orientation vis-à-vis the island portion of the province. It is also necessary to examine whether the prejudice to the other districts outweighs the benefits if Labrador remains a separate district. We cannot assess the place of Labrador without considering voters in other parts of the province, but importantly, we simply must assess the place of Labrador within the province.

History

Labrador has a long and storied history, somewhat connected to, but often quite separate from, life on the island of Newfoundland. Governance of the large territory moved from St. John’s to Quebec and back several times in the seventeenth and eighteenth centuries. Labrador was administered by the French, operating from present-day Quebec, by 1748. By the Treaty of Paris (1763), it was transferred to the British, who continued to administer the territory as part of the colony of Lower Canada, now the Province of Quebec. In 1809, the British transferred responsibility for Labrador from Lower Canada to the separate colony of Newfoundland.

Newfoundland continued to administer the territory; however, the boundary between Labrador and Canada was undetermined until a decision by the Judicial Committee of the Privy Council in London in 1927 set the boundary at its present-day limits. While these historical facts do not, by themselves, set out a historical background for Labrador that is entirely separate from the island, they do demonstrate that the historical roots of Labrador and the island of Newfoundland are not identical.

The history of the district supports a finding of extraordinary circumstances.

Geography

The land mass of Labrador comprises some 70 percent of the area of the province, while it contains only 5.2 percent of the total population. It is physically separated from the island, and there is no fixed transportation link between the two. In some respects, it is similar to the northern regions of six of the other provinces. It has, when one considers the sizable Indigenous populations, transportation difficulties, climate and level of services, similarities to the three northern territories of Canada.

Notwithstanding the fact that other provinces have large, sparsely populated northern regions, none of them have a northern territory that is geographically separate. Several have, in the past, established boundaries for northern districts that deviated from the quota for those provinces. However, none has a deviation that is comparable to that of Labrador.

That Labrador is separate is a geographical fact. That separateness has given it a culture and history that is unique within Canada. This fact makes a significant difference in the context of electoral boundary adjustments. In other provinces, it is possible to move a boundary of a remote northern district slightly up or down without making a significant change to the character of the district. This is not possible in our province: the inclusion of Labrador within an island-based district would mean substantial changes to the nature of political representation in that part of the province.

This factor strongly supports a finding that extraordinary circumstances exist to justify deviation from the provincial quota of greater than 25 percent.

Culture and Politics

History and geography have meant that Labrador has developed its own culture in music and other arts. It has also had unique political movements since Confederation with Canada. For example, a provincial party bearing the name New Labrador Party was formed in the late 1960s; it elected a member of the House of Assembly in the election of 1971 and again in a by-election in 1972. The party disappeared in the mid-1970s, but was resurrected in the 1980s in response to perceived grievances against the island-based government. It did not elect members during this latter period, but its existence adds weight to the view that Labrador's political culture is somewhat distinct from that of the island and that the region feels disadvantaged or disconnected from power, unable to adequately have its voice heard.

This factor somewhat supports a finding that extraordinary circumstances exist.

Indigenous Populations

A significant portion of the population of Labrador is Indigenous (43 percent, according to the 2016 Canadian census). This compares with 24 percent for the district of Long Range Mountains and under 6 percent for all other federal districts in the province.

There are several Indigenous groups in Labrador, including the Inuit of Nunatsiavut, the Innu Nation and the Inuit of NunatuKavut. The presence of such a large proportion of Indigenous people within the district creates a community of identity and interest quite distinct from other districts. The issue of appropriate Indigenous representation within the Canadian political system has been raised in numerous contexts, including the Report of the Royal Commission on Aboriginal Peoples (1996), which recommended the creation of a third chamber of Parliament elected by Indigenous nations or peoples. While other countries include separate seats for Indigenous populations (e.g. New Zealand), Canada has no such system. Regardless, within a framework of reconciliation, acknowledging the sizable Indigenous population residing in Labrador suggests that special attention ought to be paid to this region.

This factor strongly supports a finding that extraordinary circumstances exist.

Prejudice to Other Districts

The only prejudice to other districts is the potential for their representation to be diminished by a decision to have a separate district for Labrador. If the boundaries for all districts were set to achieve some degree of parity, each would have a population of about 72,936. That is the quota for the province, including Labrador. Without Labrador, the parity population for each of the island districts would be 80,649, a gap of about 8,000 per district. The Commission notes that adherence to this level of population for the island districts is still well below the average of most other provinces. This means that the level of representation in the province, as measured by the number of citizens for each elected member, is comparable to (and potentially better than) that seen in many other Canadian districts.

In the view of the Commission, continuing to recognize Labrador as a separate district does not create a significant disparity of representation in the other districts. Indeed, it is likely to improve representation for whichever district would be attached to Labrador since the added travel and distance would make it much more challenging for its MP to adequately represent all constituents. The increase in population in the island districts does not present a compelling reason to deviate from the community of interest and identity found in the Labrador district.

This is not a factor that, in the view of the Commission, negates a finding of the existence of extraordinary circumstances in the case of Labrador.

Summary

Residents of Labrador (including members of various Indigenous communities, settlers and more recent immigrants), whether residing in small coastal communities, in or near the major service centre in Upper Lake Melville or in the major natural-resource-development towns of Labrador West, have for decades asserted the existence of a shared community of interest. Taken together, the Labrador region's history, geography and community of interest, as well as the strength of its many distinct Indigenous communities, warrant the continuance of a separate electoral district. Because of its immense geographic size, effective representation in this region is extraordinarily difficult to achieve. If Labrador were part of a riding that extended to the island portion of the province, it is clear that adequate representation for all constituents would be difficult to achieve.

The Act is quite clear that representation by population is the primary consideration in the Commission’s work, but there is also leeway for divergence based on communities of interest and cultural and geographic factors. The direction contained in the Act charges the Commission, as a first principle, to achieve equality of voting power as it redraws the electoral map. The Supreme Court in the *Carter* decision provided an interpretation that values “effective” representation over absolute “parity” of representation. The Commission must consider factors such as “geography, community history, community interests and minority representation.” Indeed, in the majority opinion, Justice McLachlin (as she was then) noted that this “list is not closed,” meaning that additional factors could also be considered by commissions (*Carter*, para. 31). The Act permits a deviation from the quota for these factors and, in addition, to maintain a manageable geographic size and to recognize a community of interest and identity. All these factors have been considered by the Commission in its decision respecting Labrador.

For the past 35 years, the Labrador portion of the province constituted a separate electoral district, even though its population was more than 25 percent below the electoral quota. In the previous redistribution, that deviation was 63.6 percent under the provincial electoral quota. This is a significant deviation – in fact, the largest deviation of any district in any of the other provinces. Only the three northern territories have a population that is close to that of Labrador. They, of course, are not subject to adherence to a provincial quota since they are entitled to only one representative each in the House of Commons.

Using the numbers from the 2012 redistribution, the deviation from the provincial quotas in other provinces with large, remote northern districts was quite varied. The table below illustrates the point.

Province	District	Deviation from Provincial Quota
British Columbia	Skeena—Bulkley Valley	–13.53%
Alberta	Fort McMurray—Cold Lake	–5.29%
Saskatchewan	Desnethé—Missinippi—Churchill River	–5.88%
Manitoba	Churchill—Keewatinook—Aski	–1.34%
Ontario	Kenora	–47.30%
Quebec	Abitibi—Baie-James—Nunavik—Eeyou	–15.64%

It is interesting to note that, in Quebec, because the Commission in that province decided to apply the quota on a regional basis, one riding, that of Avignon—La Mitis—Matane—Matapédia, situated in the south of the province, and amply served by a transportation network, had a deviation of –26.42 percent, the highest in that province. Only in Ontario, in the case of Kenora, did the Commission find it necessary to find “extraordinary circumstances” to provide a rationale for the deviation.

Labrador bears some comparison to several of these ridings. It is remote, has a limited transportation network and is geographically comparable in size to the largest districts in other provinces. Uniquely, it is the only district in any province that is geographically separate from the rest of the province.

Given these factors, and the discussion above, the Commission is of the opinion that extraordinary circumstances exist to permit a deviation from the provincial quota of more than 25 percent in the case of Labrador.

Even if the Commission were inclined to re-examine this issue, given that Labrador has been a separate riding for some 35 years, there would need to be compelling reasons to change the status quo. Previous commissions have decided that the circumstances of Labrador were sufficiently extraordinary to permit a greater deviation from the quota. The continuance of the current boundaries has an impact on the level of representation of other electoral districts in the province. The impact, however, is not so great as to constitute a compelling reason to depart from the existing boundaries.

Methodology for the Commission's Work

Having decided that Labrador should remain a separate district, the Commission decided that it would require a modified approach to assessing the boundaries of each district against a quota. As we have noted, the Act requires the calculation of a quota for the province based on the latest census population divided by the number of seats allocated. That is to be the starting point for the Commission's work.

However, the Commission's decision to maintain a separate seat for Labrador presents a challenge in determining the boundaries for the remaining six districts. We are charged by the Act with setting boundaries so that the population of each district remains as close as possible to the provincial quota. Setting Labrador as a separate district changes the math.

The 2021 decennial census established the population of the province at 510,550, a change from the 2011 census, which had reported a population of 514,536. The allocation of seven seats to the province means that the provincial quota in 2022 is 72,936. Taking Labrador out of the calculation means that the population of the other districts would significantly deviate from the quota, although the deviation would not approach the limit of 25 percent set out in the Act.

The Commission decided that it would be useful to set a separate quota for the districts on the island and use that quota as the target when setting boundaries. When we subtract the population of Labrador (26,655) from the provincial population, the island population is 483,895. For the purposes of its work, the Commission decided to work with a quota of 80,649 for the six island districts (483,895 divided by 6). In this proposal report, the term "provincial quota" will be used in reference to the quota for the entire province (510,550 divided by 7). The term "reference quota" will be used in calculating the deviation for the six districts on the island, without including Labrador's population.

The Commission remained mindful of the direction contained in the Act and the decision of the Supreme Court. The principles of arithmetic parity were applied, along with ensuring the maintenance of geographic integrity, communities of interest and identity, transportation links and other obstacles to effective representation.

The Commission also reviewed the significant changes in boundaries on the island brought about by the previous commission in 2012. At that time, the districts on the west coast and the south coast of the island were reconfigured. Previously, the boundaries for both districts had followed the old transportation routes, involving, for the most part, travel by water. The 2012 commission decided to follow the modern transportation routes so that representation for both

districts would become more manageable from communication and transportation perspectives. The Commission decided that it would not deviate from this approach in this redistribution.

Subject to the use of the reference quota for the districts on the island, the Commission's approach in presenting this proposal followed the direction in section 15 of the Act. Boundaries were adjusted, first, to have the population of each district adhere as closely as possible to the quota. Second, in adjusting the existing boundaries, the approach intended to reflect communities of interest or identity, or historical patterns, where these were evident. Where possible, municipalities would not be divided.

As a working principle, the Commission endeavoured to propose boundaries that would bring all the island districts as close as possible to a deviation of 10 percent from the provincial quota. Since the Commission had set a separate quota for the districts on the island, the goal was to ensure that the variations from the reference quota would be less than 5 percent.

In examining the population shifts on the island, it was determined that, for the most part, only small adjustments were required to the boundaries. While the province as a whole recorded a loss of population, the ridings on the Avalon Peninsula saw an increase. This reflects a continuing pattern of population movement from the rural to the urban areas of the province. As a consequence, districts on the Avalon Peninsula generally decreased in geographic size to reflect the increase in population, and districts elsewhere on the island increased in geographic size to reflect a decrease in population.

Proposed Boundaries

For the remainder of this report proposing a new electoral boundaries regime for the province, the Commission will first address the population shifts on the island and propose changes to the existing boundaries. It will, at this stage, use the current district names for ease of reference. After addressing the boundaries, the proposed names of each district will be discussed.

Before addressing the changes in boundaries, it is useful to note the current population of each district to determine the extent of the changes necessary to ensure that adherence to the quota is maintained. The following chart shows the results of the 2021 census, as reported by Statistics Canada, for the existing districts.

Federal Electoral Districts 2012	Population 2021	2021 Deviation from Provincial Quota
Avalon	87,191	19.55%
Bonavista—Burin—Trinity	71,898	-1.42%
Coast of Bays—Central—Notre Dame	74,201	1.73%
Labrador	26,655	-63.45%
Long Range Mountains	81,716	12.04%
St. John's East	87,345	19.76%
St. John's South—Mount Pearl	81,544	11.80%
Total Population	510,550	
Provincial Riding Average	72,936	

These numbers demonstrate that adjustments are required in several districts to bring their populations as close as possible to the provincial quota. Given the discussion above, the Commission will use the reference quota for the island districts but will ensure that deviation from the provincial quota remains within the limits set by the Act. Starting with the census numbers for the existing districts, the Commission has adjusted the boundaries as part of this proposal.

Avalon

In the Avalon district, the 2021 census showed an increase of 6.93 percent from 2011. Based on the first principle of staying close to the quota, this district is one that should decrease in geographic size in order to accommodate population growth.

The Commission decided to propose three changes to its boundaries to bring the population closer to the reference quota. First, under the previous redistribution, the Town of Paradise had been divided between the districts of Avalon and St. John's East. The Commission decided to draw the boundary so that the entire town was in the district of Avalon, rather than dividing the town across districts. That change would have the effect of increasing the population of the district and thereby having a greater deviation from the provincial quota. However, the benefit to the municipality of not being divided would, in the view of the Commission, be significant.

Second, the communities in Conception Bay North from Spaniard's Bay to Victoria should move to the adjacent district of Bonavista—Burin—Trinity, and the boundary of Avalon should be drawn north of Bay Roberts. This change would bring the population closer to the provincial quota. It would have the effect of placing communities in the Conception Bay North area in separate districts, but it would not divide municipalities. The Commission is proposing that the new boundary follow the municipal boundary between the towns of Spaniard's Bay and Bay Roberts. The former would move to the district of Bonavista—Burin—Trinity, with the latter remaining in the district of Avalon.

Third, while there is only a very small population in the area of St. John's west of the Trans-Canada Highway, the Commission proposes that the boundary in this area follow the highway. This means that all the area west of the highway in the vicinity of Paradise and Conception Bay South would be in the district of Avalon.

These three changes would reduce the population of Avalon to 79,745. It would deviate from the reference quota by -1.12 percent and from the provincial quota by 9.34 percent.

Bonavista—Burin—Trinity

This district recorded a decrease of 6.27 percent in its population since the 2011 census. This decline in population leads the Commission to propose an increase in the geographic area of the district to bring it closer to the reference quota.

The Commission has already proposed that several communities in Conception Bay North should be included in this district and taken out of the district of Avalon. In addition, it is proposing a significant shift in the boundary in the Bonavista North area. The boundary would now move all the communities along Routes 320 and 330 in the northern part of the district, generally from Carmanville to Centreville-Wareham-Trinity, into the adjacent district of Coast of Bays—Central—Notre Dame. The communities of Gambo, Hare Bay and Dover would remain in this district.

This change would place the communities from Carmanville to Centreville-Wareham-Trinity within their natural community of interest. Most of the services for this region would be found in the Town of Gander.

Bonavista—Burin—Trinity would then have a population of 78,741. It would deviate from the reference quota by –2.37 percent and from the provincial quota by 7.96 percent.

Coast of Bays—Central—Notre Dame

This district recorded a decline in population of 4.98 percent from 2011. This decline in population leads the Commission to propose an increase in geographic area to bring this district closer to the quota.

Besides the change occasioned by the proposal to move the area in Bonavista North to this district, the Commission also proposes a small change in the White Bay region. We propose to move the communities of Galeville, Georges Cove and The Beaches out of the Coast of Bays—Central—Notre Dame district into Long Range Mountains.

These changes result in a population for Coast of Bays—Central—Notre Dame of 81,567. This number will deviate from the reference quota by 1.14 percent and from the provincial quota by 11.83 percent.

Labrador

This district recorded a decline in population of 0.27 percent from that recorded in 2011. Normally, a decline in population would lead to an increase in geographic area to bring the district closer to the quota. However, based on our discussion earlier, the Commission is of the view that extraordinary circumstances exist in the case of Labrador and that a significant deviation from the provincial quota is warranted. No change is being recommended to the boundaries of this district.

Thus, with a population of 26,655, Labrador will deviate from the provincial quota by –63.45 percent. This compares with a deviation of –63.6 percent in the report of the 2012 Commission.

Long Range Mountains

This district recorded a decline in population of 6.71 percent from the 2011 census. This would normally result in a proposal to increase its geographic area to bring it closer to the provincial quota.

Even with the decline, the population in the district of Long Range Mountains remains close to both the provincial and the reference quotas, in line with other districts. Its 2021 population of 81,716 represents a deviation from the reference quota of only 1.32 percent. The deviation from the provincial quota is 12.04 percent. In both cases, the deviation is in line with other districts.

However, when the Commission reviewed the existing boundary of this district, it found an anomalous situation in the area of White Bay. While the town of Hampden is within the district, the adjacent communities of Galeville, Georges Cove and The Beaches are not. They are connected by road to Hampden, but are situated within the neighbouring district of Coast of Bays—Central—Notre Dame. Thus, the boundary has been redrawn so that these small communities are located within the district to which they are most connected. The impact on the overall population is minimal.

This change results in a population for Long Range Mountains of 81,795. It will deviate from the reference quota by 1.42 percent and from the provincial quota by 12.15 percent.

St. John's East

This district recorded an increase in population of 6.6 percent from the 2011 census. This would justify a proposal to reduce its geographic area to bring it closer to the provincial quota.

Previously, the Town of Paradise was divided between the districts of Avalon and St. John's East. The Commission proposes that the entire municipality of Paradise should be within the district of Avalon and that the district of St. John's East no longer contain any portion of the town of Paradise.

In addition, the Commission proposes that the boundary between St. John's East and St. John's South—Mount Pearl be redrawn so that the areas on both sides of St. John's Harbour will be within St. John's East. This change satisfies the objective of maintaining a community of interest around the harbour, an issue raised by the public in the 2012 Boundary Commission hearings.

These changes result in a population for St. John's East of 80,874. It will deviate from the reference quota by 0.28 percent and the provincial quota by 10.88 percent.

St. John's South—Mount Pearl

This district recorded a small decrease in its population of 0.49 percent from the 2011 census. This is almost insignificant, and the Commission did not propose any major change to the boundaries of this district.

There is a very small population in the old district of St. John's South—Mount Pearl that can be found west of the Trans-Canada Highway, and the Commission proposes that the boundary in this area follow the highway.

The Commission did view the area around St. John's Harbour as being akin to a community of interest. It proposes that the boundary should be redrawn to include this area in the district of St. John's East, moving it from St. John's South—Mount Pearl.

This change results in a population for St. John's South—Mount Pearl of 81,173. It will deviate from the reference quota by 0.65 percent and from the provincial quota by 11.29 percent.

Summary

The Commission is proposing boundary changes that will respond to the changes in population since the census of 2011. In so doing, the population of each of the island districts has been maintained within 5 percent of the reference quota. The result also ensures that all the island districts are close to a deviation of 10 percent from the provincial quota. The table below summarizes the results that form the basis of the Commission's proposal.

Federal Electoral Districts 2012	2021 Population	Deviation from Provincial Quota	Deviation from Reference Quota
Avalon	79,745	9.34%	-1.12%
Bonavista—Burin—Trinity	78,741	7.96%	-2.37%
Coast of Bays—Central—Notre Dame	81,567	11.83%	1.14%
Labrador	26,655	-63.45%	-66.95%
Long Range Mountains	81,795	12.15%	1.42%
St. John's East	80,874	10.88%	0.28%
St. John's South—Mount Pearl	81,173	11.29%	0.65%

It is evident that keeping the current boundaries of Labrador has an impact on the other districts. However, for the reasons outlined above, the Commission proposes that Labrador remain a separate district. The resulting variance from the provincial quota is in line with the legislative direction and compares favourably with representation in other parts of Canada. We would note that when the population of the districts on the island is considered, the variance from what we have called the reference quota is very small. It meets the goal set by the Commission of having a variance of less than 5 percent for the island districts.

Names of the Districts

A variety of principles can be applied to the naming of districts. This Commission followed three main principles.

1. Names should be as simple as possible to provide for easy reference, both in the House of Commons and elsewhere.
2. Names should reflect, to the greatest extent possible, the geographic features of the district. Names of towns should be avoided as the choice of one community of necessity leaves out other communities.
3. Names should be faithful to the history of that part of the province.

The Commission endeavoured to streamline district nomenclature with a number of proposed changes. However, we understand that naming can be quite contentious, and indeed, historically across Canada, changes to district names are the reason for 10 percent of the objections filed by the public, and 10 percent of the objections filed by MPs, to boundary commission proposals. The Commission is open to conversations with the public about all details of the Commission's work.

Avalon

Avalon will retain its current name. The district occupies a significant amount of the Avalon Peninsula. The name is clear, is easily recognizable and does not create ambiguity.

Bonavista—Burin—Trinity

The Commission recommends that this district be renamed Terra Nova—The Peninsulas. The new name will reflect the inclusion of the towns of Carbonear, Harbour Grace and Spaniard's Bay, among others, and will better represent the district's geography and community makeup. The first part of the name, Terra Nova, is easily recognizable because of Terra Nova National Park. The revised boundary now includes three major peninsulas: the Burin and Bonavista Peninsulas and most of the Bay de Verde Peninsula.

Coast of Bays—Central—Notre Dame

While this district's boundaries did not undergo major changes, the Commission thought that its name did not meet any of the objectives of simplicity, recognizability or history. Drawing on two geographic features in the north and south of the district, the Commission proposes that the name be changed to Notre Dame—Bay d'Espoir.

Labrador

The Commission is not recommending a change in name to the district of Labrador. The name is clear and recognizable, and it reflects the district's geographic area and historical continuity.

Long Range Mountains

The Commission is not recommending a change to the name of this district. It reflects a dominant geographic feature, the mountain range that is present in almost the full north-south length of the district, and it preserves some historical continuity as this is already the name of the district.

St. John's East

Although the name St. John's East deviates from the geographic naming principle, the Commission thought that its strong historical provenance, dating from 1832 provincially and 1949 federally, as well as its reflection of the name of the capital city of the province, was sufficiently important to warrant keeping the existing name. It meets the objectives of simplicity, recognizability and history. The Commission proposes no change to the name of this district.

St. John's South—Mount Pearl

This district was formerly called St. John's West. It was changed in 2012 to reflect its correct geographic orientation of north-south, even though history and local usage, through many generations, have used east-west. Recognizing that there are several significant municipalities in the riding apart from St. John's and Mount Pearl, all of which cannot be named explicitly in the riding name, the Commission has opted to continue its emphasis on the geographic naming principle. A major geographic feature of this district is its distinction as the most easterly point in North America. Accordingly, a new name of Cape Spear is proposed. It meets the objectives of simplicity, recognizability and history.

Process for Public Engagement and Consultation

Integral to the adjustment of electoral district boundaries is a consultation process with the public. All residents of our province are encouraged to participate in this process and provide feedback to the Commission. The Commission will be integrating this feedback as it revises its proposal and writes its final report, to be submitted to the House of Commons.

The consultation process includes a series of public hearings to take place across the province, and residents are also encouraged to send written feedback directly to the Commission. All written feedback should be submitted in advance of the public hearings, by August 1, 2022.

Commission Contact Information

Residents may contact the Newfoundland and Labrador Electoral Boundaries Commission by email, letter mail or phone as follows:

NL-TNL@redecoupage-federal-redistribution.ca

10 Barter's Hill, 3rd Floor
John Cabot Building
St. John's, NL A1C 6M1
1-855-726-4103

For updates on the boundaries commission processes in Newfoundland and Labrador as well as across the country, the public is invited to follow the Commission's social media accounts on Twitter **@FedBoundaries**, on Facebook **@FedBoundaries** and on Instagram **@FedBoundaries**. Unfortunately, official proposals cannot be accepted through these channels. However, feedback can be submitted to the Commission by email or by post at the address above.

Public Hearings

Public hearings will take place, in each of the proposed districts across the province, in the months of August and September. The Commission looks forward to hearing feedback from residents of the province on this preliminary proposal, and it encourages individuals and groups to submit written commentary, either in addition to or instead of an in-person appearance at the public hearings. A detailed list of hearings, including dates and locations, can be found below in Appendix A.

How Public Hearings Will Be Conducted

1. These rules may be cited as the “Rules of the Federal Electoral Boundaries Commission for the Province of Newfoundland and Labrador (Hearing of Representations), 2022.”
2. In these rules:
 - a) “Act” means the *Electoral Boundaries Readjustment Act*, R.S.C. 1985, c E-3;
 - b) “advertisement” means a notice or notices published as directed in subsection 19(2) of the Act, setting forth the times and the places where the sittings shall be held for the hearing of representations;
 - c) “Chairperson” includes the Deputy Chairperson;
 - d) “Commission” means the Federal Electoral Boundaries Commission for the Province of Newfoundland and Labrador, established by proclamation dated November 1, 2021;
 - e) “Commission Secretary” means the Secretary to the Commission;
 - f) “notice” means a written expression of intention to make a representation in compliance with subsection 19(5) of the Act;
 - g) “representation” means any expression of opinion presented by any interested person at a duly convened sitting of the Commission relating to the division of the province into electoral districts, as proposed by the Commission;
 - h) “sitting” means a public hearing convened by the Commission in accordance with and for the purpose set out in section 19 of the Act.
3. A person giving notice shall state:
 - a) at which of the places designated in the advertisement such person wishes to make a representation;
 - b) the language of preference that the person wishes to use and any special needs that he or she may have.
4. If a person giving notice fails to comply with the provisions of Rule 3, the Commission Secretary shall ascertain from such person the place at which such person wishes to appear to make a representation, his or her language of preference and any special needs.
5. Rules 3 and 4 are made for administrative purposes only and do not operate to prevent a person who has given notice from making the representation at any place of sitting of the Commission set out in the advertisement, subject only to the power of the Commission pursuant to Rule 6 to cancel a sitting at that place.
6. If it appears that no one will make a representation at any place designated by the advertisement as a place of sitting, the Commission or the Chairperson thereof may cancel the sitting at such place.
7. If a quorum cannot be present at a place of sitting on the date set by the advertisement, the Commission or the Chairperson thereof may postpone that sitting to a later date.

8. The Commission Secretary shall inform any person who has given notice, but has not been heard, of such cancellation or postponement. Public notice shall also be given by the Chairperson or the Commission by such means as they consider adequate.
9. Sittings shall be held in public, and representations shall be made with due regard to formal procedures.
10. Only one person shall be heard in the presentation of a representation at a sitting unless the Commission, in its discretion, decides otherwise.
11. At each sitting, the Commission shall decide the order in which the representations are heard.
12. The Commission may hear an oral representation by conference call with the consent of the person wishing to make a representation.
13. The Commission will consider any written submissions made in compliance with these rules and the Act, and it will make public such submissions at one or more of the sittings.
14. Two members of the Commission shall constitute a quorum for the holding of a sitting.
15. When the hearing of a representation cannot be completed within the time allotted, the Commission may adjourn the sitting to a later date.
16. The Commission shall have the power to waive any requirement that the Commission deems to be a defect in form and not in substance.
17. The Commission may hear a representation without notice having been given if the Commission considers it to be in the public interest to do so.

Virtual Hearings Process

Given the pandemic situation and the increased expectation from the public with regard to online services, the Newfoundland and Labrador Commission will hold a virtual public hearing. In addition to the principles applied to in-person public hearings, the following procedures and requirements will apply to virtual public hearings:

- The link to the virtual public hearing is not public, and it is shared only with participants or observers who have registered with the Commission and with members of the media.
- A moderator will manage the agenda as well as the speaking time and microphones of the participants.
- Participants will have the option to share their screen.
- Participants may use a headset.

Summary

The Commission presents this proposal for consideration by members of the public. The key elements are summarized as follows:

- Labrador will remain a separate district.
- For all districts on the island, the proposed boundary adjustments will bring them well within the limits set by the Act and very close to the reference quota for the island.
- The names of several ridings have been changed using the rationales noted above.

The districts as proposed are summarized in the table below.

Proposed Federal Electoral District	2021 Population	Deviation from Provincial Electoral Quota	Deviation from Reference Quota
Avalon	79,745	9.34%	-1.12%
Cape Spear	81,173	11.29%	0.65%
Labrador	26,655	-63.45%	-66.95%
Long Range Mountains	81,795	12.15%	1.42%
Notre Dame—Bay d'Espoir	81,567	11.83%	1.14%
St. John's East	80,874	10.88%	0.28%
Terra Nova—The Peninsulas	78,741	7.96%	-2.37%

The variances from the provincial quota are within the range permitted under section 15 of the Act.

In the appendices, three things can be found: a schedule of public hearings, a detailed description of each electoral district and four maps.

Dated at St. John's, Newfoundland and Labrador, this 23rd day of June, 2022.

The Honourable Justice Alphonsus E. Faour, Chair

Dr. Amanda Bittner, Member

Ms. Julie Eveleigh, Member

Federal Electoral Boundaries Commission for the Province of Newfoundland and Labrador

APPENDIX A: Schedule of Public Hearings

Location	Place of hearing	Date of hearing	Time of hearing
Marystown	Hotel Marystown 76 Ville Marie Drive	Monday, August 15, 2022	2 p.m.
Clareville	Clareville Inn 134 Trans-Canada Highway	Tuesday, August 16, 2022	2 p.m.
Gander	Albatross Hotel 114 Trans-Canada Highway	Wednesday, August 17, 2022	2 p.m.
Grand Falls- Windsor	Mount Peyton Inn 214 Lincoln Road	Thursday, August 18, 2022	2 p.m.
Stephenville	Days Inn 44 Queen Street	Monday, August 22, 2022	1 p.m.
Corner Brook	Hew and Draw Hotel 55 West Street	Tuesday, August 23, 2022	1 p.m.
Happy Valley- Goose Bay	Hotel North Two 382 Hamilton River Road	Thursday, August 25, 2022*	1 p.m.
Conception Bay South	Discovery Room Manuel's Interpretation Centre 7 Conception Bay Highway	Monday, September 12, 2022	2 p.m.
Bay Roberts	Bay Roberts Hotel 72-76 Water Street	Tuesday, September 13, 2022	2 p.m.
Mount Pearl	Gloria Pearson Community Centre 25 Holden Street	Wednesday, September 14, 2022	2 p.m.
St. John's	Capital Hotel, Salon A 208 Kenmount Road	Thursday, September 15, 2022	2 p.m.
Virtual hearing	The link will be provided to participants	Friday, September 16, 2022	2 p.m.

*Please note that the date in the newspaper inserts for the public hearing in Happy Valley-Goose Bay has since changed. The date given above is correct.

APPENDIX B: Boundaries and Names of Electoral Districts

There shall be in the Province of Newfoundland and Labrador seven (7) electoral districts, named and described as set out below, each of which shall return one member.

In the following descriptions:

(a) reference to “road,” “street,” “drive,” “hill,” “cove,” “route,” “highway,” “river,” “brook,” “lake,” “harbour,” “bay,” “pond,” “gut” or “channel” signifies the centre line of said feature unless otherwise described;

(b) wherever a word or expression is used to denote a territorial division, such word or expression shall indicate the territorial division as it existed or was bounded on the first day of January, 2021;

(c) all offshore islands are included in the landward district unless otherwise described;

(d) the translation of the term “street” follows Treasury Board standards, while the translation of all other public thoroughfare designations is based on commonly used terms but has no official recognition;

(e) all First Nation territories lying within the perimeter of the electoral district are included unless otherwise described; and

(f) all coordinates are in reference to the North American Datum of 1983 (NAD 83).

The population figure of each electoral district is derived from the 2021 decennial census.

Avalon

(Population: 79,745)

(Map 3)

Consists of that part of the Avalon Peninsula on the Island of Newfoundland lying southerly of a line described as follows: commencing at a point in the Eastern Channel at latitude 47°25'48"N and longitude 54°03'35"W; thence easterly in a straight line to a point in the Eastern Channel at latitude 47°26'11"N and longitude 53°57'42"W; thence southeasterly in a straight line to a point in Long Harbour at latitude 47°24'13"N and longitude 53°55'11"W; thence easterly in a straight line to the southwesterly limit of the Town of Long Harbour-Mount Arlington Heights at the mouth of Rattling Brook; thence generally northerly, westerly, northeasterly and southerly along the limit of said town to the mouth of Collins Brook at Warrens Pond at approximate latitude 47°26'32"N and longitude 53°44'50"W; thence southeasterly in a straight line to a point at latitude 47°24'44"N and longitude 53°43'54"W; thence easterly in a straight line to the southwesternmost point of the limit of the Town of Whitbourne; thence generally easterly and northerly along said limit to the northeasternmost point of the limit of said town; thence northeasterly in a straight line to the southwesternmost point of the limit of the Town of Spaniard's Bay; thence generally northeasterly along the limit of said town to the limit of the Town of Bay Roberts; thence generally easterly along the limit of said town (through Spaniard's Bay and Conception Bay) to the northeasternmost point of the limit of the Town of Bay Roberts in Conception Bay; thence generally southerly along the limit of said town in Conception Bay to the northeasternmost point of the limit of the Town of Cupids; thence southeasterly in a straight line to a point in Conception Bay at latitude 47°32'07"N and longitude 53°02'09"W; thence easterly in a straight line to the northwesterly limit of the Town of Conception Bay South at the mouth of Long Pond Harbour; thence generally northeasterly along the limit of said town to the limit of the Town of Paradise; thence generally northerly, southeasterly and southwesterly along the limit of said town to its intersection with the Trans-Canada Highway (Route 1); thence generally southwesterly along said highway to the southerly limit of the City of St. John's at Loon Pond; thence generally southeasterly along the limit of said city to the northwesternmost point of the limit of the Town of Bay Bulls; thence generally southerly along the limit of said town to the northwesternmost point of the limit of the Town of Witless Bay; thence southerly and generally easterly along said limit to the southeasternmost point of the limit of said town in the Atlantic Ocean.

Includes Iona Islands, East Green Island, North Green Island, Harbour Island, Fox Island, Great Colinet Island and all other islands adjacent to the shoreline of the above-described area.

Cape Spear

(Population: 81,173)

(Maps 3 and 4)

Consists of:

(a) that part of the City of St. John's lying easterly of the Trans-Canada Highway (Route 1) and lying southeasterly of a line described as follows: commencing at the intersection of Mount Carson Avenue and Kenmount Road; thence generally northeasterly along Kenmount Road and Freshwater Road to Lemarchant Road; thence southerly along said road to Barter's Hill; thence easterly and southeasterly along Barter's Hill to New Gower Street; thence generally southerly along said street and Highway 2 (Pitts Memorial Drive) to Southside Road; thence southeasterly in a straight line to a point at latitude 47°33'06"N and longitude 52°42'38"W; thence northeasterly in a straight line to a point at latitude 47°33'45"N and longitude 52°41'31"W; thence due east in a straight line to the Atlantic Ocean;

(b) the City of Mount Pearl; and

(c) the towns of Petty Harbour-Maddox Cove, Bay Bulls and Witless Bay.

Includes Gull Island and all islands adjacent to the shoreline of the above-described area.

Labrador

(Population: 26,655)

(Map 1)

Consists of all that part of the Province of Newfoundland and Labrador known as Labrador, including Belle Isle.

Long Range Mountains

(Population: 81,795)

(Maps 1 and 2)

Consists of that part of the Island of Newfoundland lying westerly and southerly of a line described as follows: commencing at the mouth of Chaleur Bay; thence generally northwesterly along said bay to the end of said bay; thence westerly in a straight line to the southeast end of Dry Pond at approximate latitude 47°50'36"N and longitude 57°31'13"W; thence northerly in a straight line to the mouth of Star Brook at Star Lake at approximate latitude 48°34'51"N and longitude 57°14'27"W; thence northerly in a straight line to a point in Hinds Lake at latitude 48°57'49"N and longitude 56°59'35"W; thence northerly in a straight line to the southeasternmost point of the limit of the Town of Hampden; thence northerly along the eastern limit of said town to Rocky Brook at approximate latitude 49°31'09"N and longitude 56°50'47"W;

thence northerly in a straight line to the mouth of Big Chouse Brook at White Bay at approximate latitude 49°36'43"N and longitude 56°47'27"W; thence northwesterly in a straight line to a point in White Bay at latitude 49°37'11"N and longitude 56°48'16"W; thence generally northerly and northeasterly along said bay (passing west of Granby Island) to a point in the Atlantic Ocean at latitude 50°32'16"N and longitude 55°30'00"W.

Includes Ramea Islands, Sops Island, Bell Island, Groais Island of the Grey Islands, Quirpon Island, St. John Island, Doone Island, Millers Island and all other islands adjacent to the shoreline of the above-described area.

Notre Dame—Bay d’Espoir

(Population: 81,567)

(Maps 1 and 2)

Consists of that part of the Island of Newfoundland described as follows: commencing at the mouth of Chaleur Bay; thence generally northwesterly along said bay to the end of said bay; thence westerly in a straight line to the southeast end of Dry Pond at approximate latitude 47°50'36"N and longitude 57°31'13"W; thence northerly in a straight line to the mouth of Star Brook at Star Lake at approximate latitude 48°34'51"N and longitude 57°14'27"W; thence northerly in a straight line to a point in Hinds Lake at latitude 48°57'49"N and longitude 56°59'35"W; thence northerly in a straight line to the southeasternmost point of the limit of the Town of Hampden; thence northerly along the eastern limit of said town to Rocky Brook at approximate latitude 49°31'09"N and longitude 56°50'47"W; thence northerly in a straight line to the mouth of Big Chouse Brook at White Bay at approximate latitude 49°36'43"N and longitude 56°47'27"W; thence northwesterly in a straight line to a point in White Bay at latitude 49°37'11"N and longitude 56°48'16"W; thence generally northerly and northeasterly along said bay (passing west of Granby Island) to a point in the Atlantic Ocean at latitude 50°32'16"N and longitude 55°30'00"W; thence generally southerly, easterly and southerly along the Atlantic Ocean to a point in Bonavista Bay at latitude 48°54'57"N and longitude 53°32'06"W; thence generally westerly along Bonavista Bay and Lockers Bay (passing north of Lockers Flat Island, Pitt Sound Island, Gooseberry Island and south of Deer Island) to a point in Lockers Bay at latitude 48°54'25"N and longitude 53°56'12"W; thence westerly in a straight line to the northeasternmost point of the limit of the Town of Hare Bay; thence southwestly and southerly along the limit of said town to the northeasternmost point of the limit of the Town of Gambo; thence westerly along the limit of said town to the northwesternmost point of the limit of the Town of Gambo; thence southwestly in a straight line to the intersection of the Trans-Canada Highway (Route 1) with an unnamed road at approximate latitude 48°48'51"N and longitude 54°19'17"W; thence southerly in a straight line to the mouth of Long Harbour River in Long Harbour at latitude 47°47'30"N and longitude 54°56'27"W; thence generally southerly along Long Harbour to the mouth of Long Harbour; thence generally southwestly along Fortune Bay and the Atlantic Ocean to a point in the Atlantic Ocean (passing south of Brunette Island and Bird Island) at latitude 47°13'00"N and longitude 55°59'53"W; thence generally northwesterly along the Atlantic Ocean to the point of commencement.

Includes Brunette Island, Sagona Island, Bird Island, St. John's Island, Pass Island, Gull Island, Granby Island, Horse Islands, Exploits Islands, North and South Twillingate Islands, New World Island, Change Islands, Fogo Island, Perry Island, Eastern Indian Island, Grandfather Island, Herring Island, Cabot Islands, Flowers Island, Funk Island, Gander Island, Keans Island, Noggin Island, Penguin Islands, Wadham Islands and all other islands adjacent to the shoreline of the above-described area.

St. John's East

(Population: 80,874)
(Maps 3 and 4)

Consists of:

(a) the towns of Bauline, Flatrock, Logy Bay-Middle Cove-Outer Cove, Portugal Cove-St. Philip's, Pouch Cove, Torbay and Wabana; and

(b) that part of the City of St. John's lying northwesterly of a line described as follows: commencing at the intersection of Mount Carson Avenue with Kenmount Road; thence generally northeasterly along Kenmount Road and Freshwater Road to Lemarchant Road; thence southerly along said road to Barter's Hill; thence easterly and southeasterly along Barter's Hill to New Gower Street; thence generally southerly along said street and Highway 2 (Pitts Memorial Drive) to Southside Road; thence southeasterly in a straight line to a point at latitude 47°33'06"N and longitude 52°42'38"W; thence northeasterly in a straight line to a point at latitude 47°33'45"N and longitude 52°41'31"W; thence due east in a straight line to the Atlantic Ocean.

Includes Bell Island, Little Bell Island, Kellys Island and all the other islands adjacent to the shoreline of the above-described area.

Terra Nova—The Peninsulas

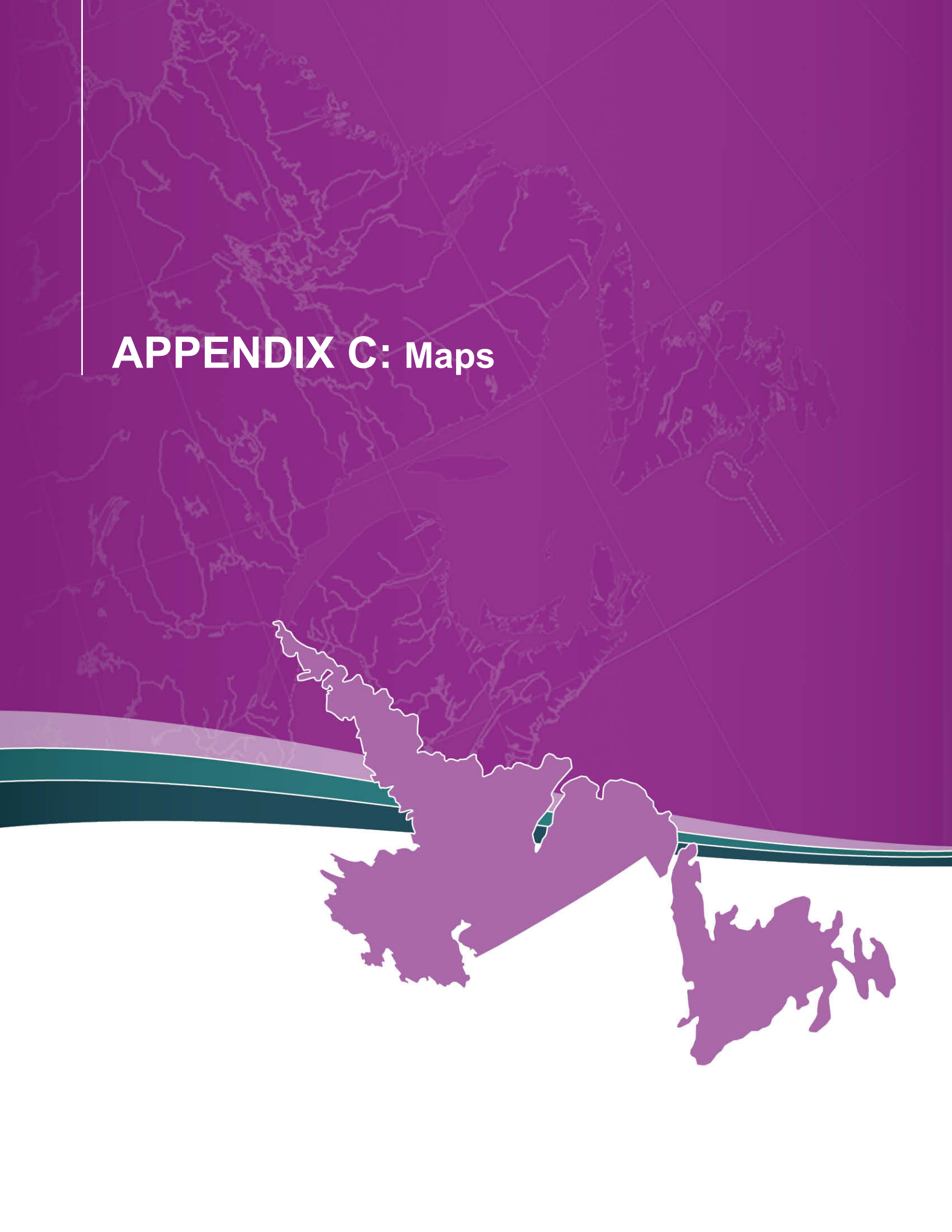
(Population: 78,741)
(Maps 1 and 2)

Consists of that part of the Island of Newfoundland and that part of the Avalon Peninsula on the Island of Newfoundland described as follows: commencing at a point in the Atlantic Ocean at the mouth of Fortune Bay at approximate latitude 47°13'00"N and longitude 55°59'53"W; thence generally northeasterly along said bay (passing south of Brunette Island and Bird Island) to the mouth of Long Harbour; thence generally northerly along Long Harbour to the mouth of Long Harbour River at latitude 47°47'30"N and longitude 54°56'27"W; thence northerly in a straight line to the intersection of the Trans-Canada Highway (Route 1) with an unnamed road at approximate latitude 48°48'51"N and longitude 54°19'17"W; thence northeasterly in a straight line to the northwesternmost point of the limit of the Town of Gambo; thence easterly along the limit of said town to the westerly limit of the Town of Hare Bay; thence northerly and northeasterly along the limit of said town to the northeasternmost point of the limit of the Town

of Hare Bay; thence easterly in a straight line to a point in Lockers Bay at latitude 48°54'25"N and longitude 53°56'12"W; thence generally easterly along Lockers Bay and Bonavista Bay passing north of Lockers Flat Island, Pitt Sound Island, Gooseberry Island and south of Deer Island to a point in Bonavista Bay at latitude 48°54'57"N and longitude 53°32'06"W; thence generally southerly along said bay, the Atlantic Ocean and Conception Bay to the northeasternmost point of the limit of the Town of Bay Roberts in Conception Bay; thence generally southwesterly along the limits of the towns of Bay Roberts and Spaniard's Bay (through Conception Bay and Spaniard's Bay) to the southwesternmost point of the limit of the Town of Spaniard's Bay; thence southwesterly in a straight line to the northeasternmost point of the limit of the Town of Whitbourne; thence generally southerly and westerly along the limit of said town to the southwesternmost point of the limit of the Town of Whitbourne; thence westerly in a straight line to a point at latitude 47°24'44"N and longitude 53°43'54"W; thence northwesterly in a straight line to the limit of the Town of Long Harbour-Mount Arlington Heights at the mouth of Collins Brook at Warrens Pond at approximate latitude 47°26'32"N and longitude 53°44'50"W; thence generally northerly, southwesterly, easterly and southerly along the limit of said town to the mouth of Rattling Brook where it joins Long Harbour; thence westerly in a straight line to a point in Long Harbour at latitude 47°24'13"N and longitude 53°55'11"W; thence northwesterly in a straight line to a point in the Eastern Channel at latitude 47°26'11"N and longitude 53°57'42"W; thence generally southerly, westerly and northerly along the Eastern Channel, Placentia Bay and the Atlantic Ocean (passing south of Point May) to the point of commencement.

Includes Woody Island, Billy Island, Flaherty Island, White Island, Cottel Island, Random Island, Ireland's Eye Island, Baccalieu Island, Harbour Grace Islands, Carbonear Island, Crawley Island, Brine Islands, Iron Island, Red Island, Long Island, Merasheen Island and all other islands adjacent to the shoreline of the above-described area.

APPENDIX C: Maps



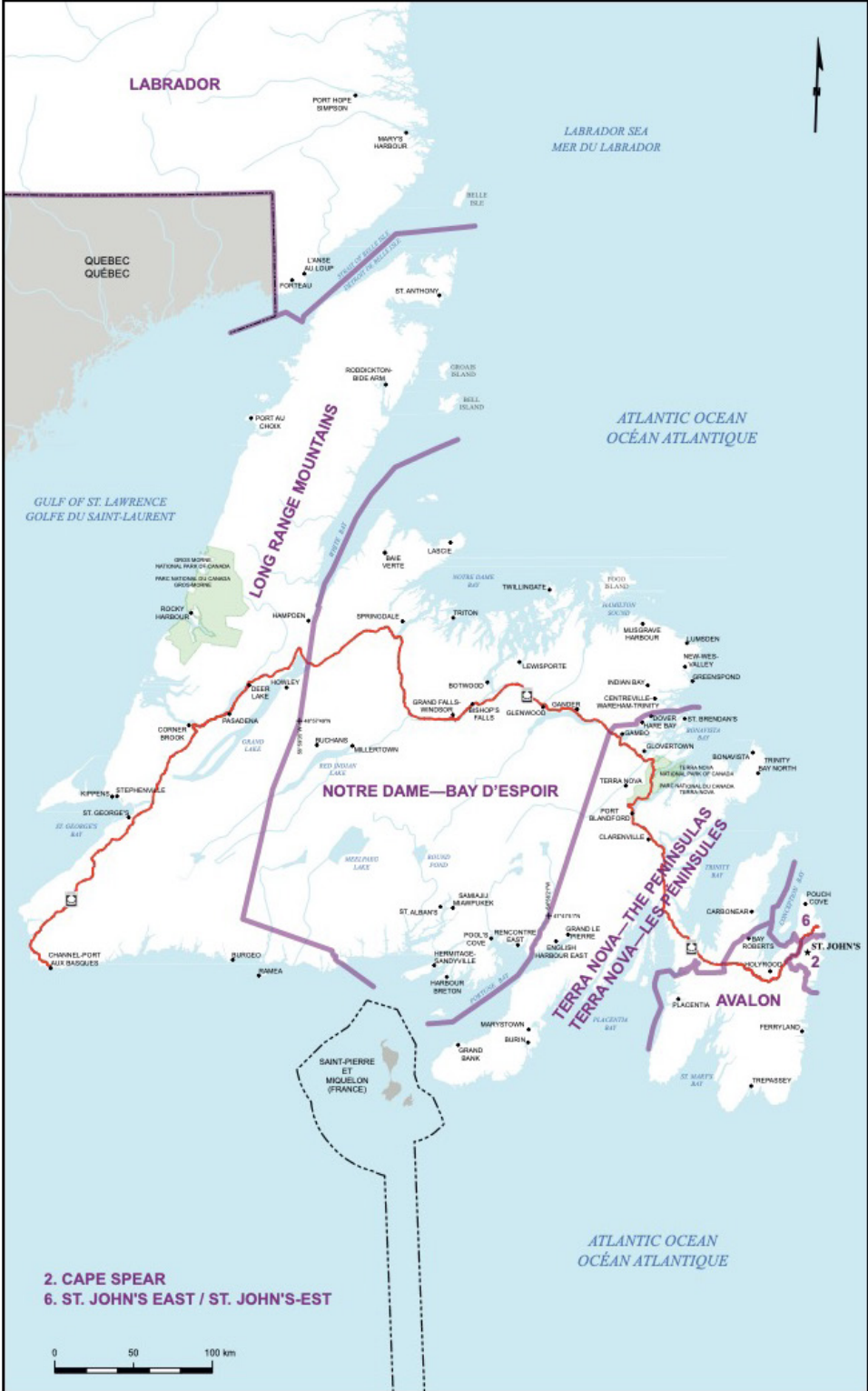
Map 1

Newfoundland and Labrador



Map
2

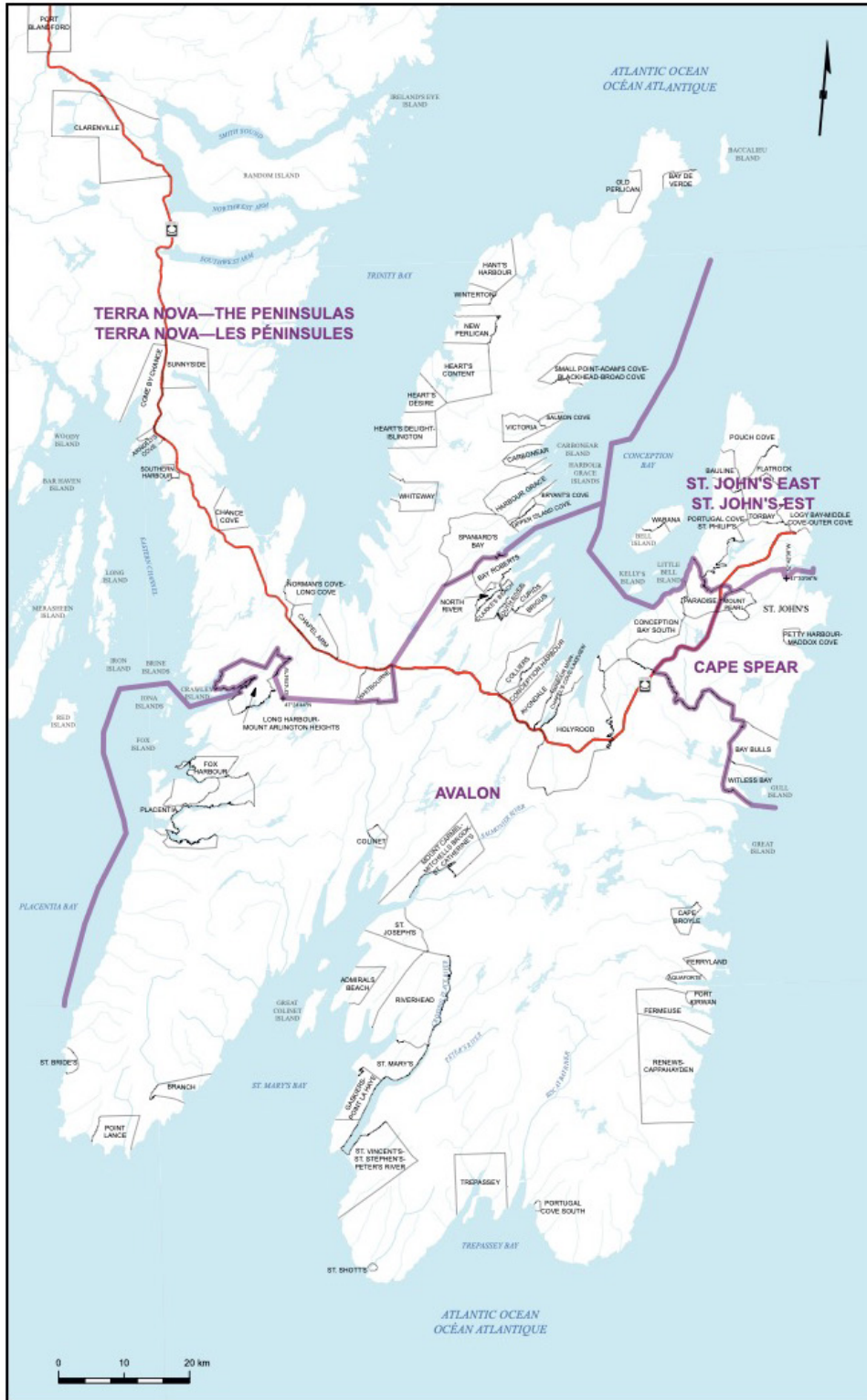
The Island of Newfoundland



2. CAPE SPEAR
6. ST. JOHN'S EAST / ST. JOHN'S-EST

Map 3

Avalon Peninsula



Map 4

City of St. John's and Vicinity

