

Messrs. Ruelokke, Way, Spracklin, Anstey, Drover, Sullivan, & Wells
Canada-Newfoundland and Labrador Offshore Petroleum Board
5th Floor, TD Place
140 Water Street
St. John's, NL
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Gentlemen:

Ref.: Hydrocarbons exploration & drilling in the Gulf of St-Lawrence

I am writing you on behalf of the Sierra Club of Canada, Québec Chapter in Montréal, to express our opposition to the currently contemplated hydrocarbons exploration & drilling in the Gulf of St-Lawrence. **We are a concerned party because Quebec's natural resources, in the broadest sense, are at the same risk as those of Newfoundland, Nova Scotia, New Brunswick, and P.E.I.** Consequently, **we hereby demand, in the strongest terms possible, an immediate moratorium to all hydrocarbons exploration and drilling in the Gulf of St-Lawrence.**

You, as a group, have the impossible mandate of trying to reconcile the irreconcilable --- to promote 'maximum hydrocarbon recovery and value' while assuring 'environmental protection and safety'. Apparently, **'worker safety and environmental protection will be paramount in all Board decisions'**. As the recent BP Macondo well blowout in the Gulf of Mexico has so graphically demonstrated, what can go wrong will, in fact, eventually go wrong, blow out, blow up in your face, and quickly destroy any heroic illusions of environmental protection. In a presumably sustainable economy, **preventing the inevitable environmental, economic, and social disaster in our own Gulf and backyard is, in our opinion, your primary responsibility.**

We wonder how the families of the 11 workers who perished in the Macondo explosion and the thousands of fishers, tourism, and related workers whose livelihoods have been so severely impacted --- we wonder how they would look upon the feasibility of your appointed mandate and objectives. In fact, the Minerals Management Service, the former U.S. federal regulator that performed your functions in the Gulf of Mexico, has already been judged a failure and its functions have been reallocated to new organizations with, presumably, lesser conflicts of interest. We are, therefore, not merely opposed to the exploration and drilling in the Gulf, but **consider that an entity such as the Canada-Newfoundland and Labrador Offshore Petroleum Board, with serious inherent conflicts of interest in its irreconcilable mandates, constitutes**

an inadequate and fundamentally flawed approach to managing this very risky resource.

We expect other intervenors have already spoken of the myriad factors which make **our Gulf a much more difficult and risky environment to work in than the Gulf of Mexico**. We expect also that many have opposed the project because of the **very real threats to spawning grounds, fish stocks, fish and bird migrations, 1000's of jobs, and imminent and unacceptable risk to healthy communities along the coasts of Newfoundland, Nova Scotia, New Brunswick, P.E.I. and Québec**. Our arguments and opposition will be similar but stated in somewhat different terms.

Firstly, **we wish to underline our full agreement with your mandate of giving 'paramount' importance to the objective of worker safety and environmental protection'**. Given that any economy and prosperity we may have is fully dependent on a healthy and sustainable environment, this is the only prudent way of managing a very risky and potentially destructive industry. It remains to be seen whether this objective will be seriously implemented by the Board or is mere window dressing for public consumption, as has been the case in similar situations in the past.

Next, as an organization that has been sensitizing the public to the importance of sustainable natural systems for about 150 years, **we wish to underline the inadequacy of current analytical schema used by bodies such as the Board**, in evaluating the various costs and benefits of such projects. Almost without exception, **such analyses have completely ignored the priceless and irreplaceable benefits which sustainable natural systems, such as the Gulf of St-Lawrence, have contributed to our collective economic, social, and spiritual well-being**, irreplaceable services such as climate and temperature regulation, the planet's most important carbon sink, regeneration of the air we breathe, **1000's of sustainable jobs that have existed for 100's of years, and the healthy surrounding communities of 5 provinces which are fundamentally dependent on these free and irreplaceable natural services**. These highly significant, invaluable, and irreplaceable services have traditionally been considered merely 'externalities', never measured, and consequently, hardly considered in the past.

"Capitalism, as practiced, is a financially profitable, non-sustainable aberration of human development. ... 'industrial capitalism' does not fully conform to its own accounting principles. It liquidates its capital and calls it income. It neglects to assign any value to the largest stocks of capital it employs --- the natural resources and living systems, as well as the social

and cultural systems that are the basis of human capital.” Natural Capitalism --- Hawken, Lovins, Lovins, p. 5

As just outlined, **we have inherited and are now rapidly squandering a 3.8 billion year old store of natural capital which, at present rates of use, will be exhausted in mere decades.** Even as world populations are expected to increase by 50% in the next 40 years, we are already greatly exceeding the planet's carrying capacity along every possible parameter, be it greenhouse gas concentrations, ocean acidity, fish stocks use, etc., etc., ad infinitum.

Yet, rather than conserving what scant natural and other resources remain to aid the transition to a carbon-neutral economy, we, collectively, are still promoting aggressively the fastest possible discovery and consumption of these precious, non-renewable resources. Rather than focusing on resource conservation, we are exploring further north into the Arctic, farther offshore, and drilling ever deeper --- **heedlessly placing our irreplaceable natural capital at ever greater risk.**

The Ukrainian region surrounding Chernobyl has, through human heedlessness, been rendered a radioactive wasteland and will be a threat to human life for 250,000 years. About 40 years ago, the nuclear reactor at Three Mile Island in Pennsylvania, came within a hair of becoming a nuclear meltdown and explosion. More recently, the Gulf of Mexico's natural capital and productive capacity has been seriously degraded by the BP blowout. Its full impact will take decades to play out. Currently, the dead and dying forests of B.C., devastated by a pine beetle infestation resulting directly from global warming, are going up in smoke, releasing still more greenhouse gases. Closer to home, through our shortsightedness, greed, and ignorance, **we have already created an ocean desert where, formerly, for centuries, abundant stocks of cod supported countless jobs and communities.**

It is said that those who are incapable of learning from history's mistakes are bound to repeat them. **Is this Board doomed to continue this senseless process of wanton destruction of the irreplaceable natural capital upon which our lives and living standards depend?** Today, we might legitimately ask if repeating history's mistakes is to be the C-NLOPB's future role.

In reminding this Board to faithfully implement its stated mandate of giving 'paramount importance' to worker safety and environmental protection, we would quote an ancient Native proverb:

**Treat the earth well.
It was not given to you by your parents,**

**It was loaned to you by your children.
We do not inherit the Earth from our Ancestors,
We borrow it from our Children.**

In other words, **the prudent and sustainable use of the Gulf is a loan from future generations and is not the Board's to squander heedlessly.**

Surely, you are all fully aware of the very grave responsibility of your position. If you are to grant even minimal respect to the many generations to come, **you cannot favour the very short-term, quick-buck, illusory 'benefits' of the petroleum industry at the expense of the irreplaceable, sustainable, and far more valuable natural systems we have globally depended on for 3000 generations. The Board cannot and must not fall prey to the fate described by the following Cree prophecy:**

**When all the trees have been cut down,
When all the animals have been hunted,
When all the waters are polluted,
When all the air is unsafe to breathe,
Only then will you discover you cannot eat money.**

In conclusion, we most emphatically urge the Board:

-to realize that the **"best long-term environment for commerce is provided by true democratic systems of governance that are based on the needs of people rather than business."** (Hawken, Lovins, Lovins, p. 10)

and

-to recognize that **exploration for and drilling of hydrocarbons in the Gulf of St-Lawrence is neither needed nor desired by the vast majority of the Canadian people,**

-to recognize that, **historically, we are at the tail end of a non-sustainable and failed, dead-end, hydrocarbon-based economy** and that the transition to resource conservation must be an urgent priority,

-to ensure that **all forms and expressions of natural capital are fully valued in any credible cost-benefit analysis** of these projects,

-to place, therefore, a moratorium on all exploration for and drilling of hydrocarbons in the Gulf of St-Lawrence under its jurisdiction, the decision that would best minimize near-term risks and maximize future choices for everyone concerned.

If the C-NLOPB fails to fully and properly weigh the likely long term impacts, **you, Messrs. Ruelokke, Way, Spracklin, Anstey, Drover, Sullivan, & Wells, will be individually accountable to this and future generations for yet another easily avoidable but devastating and irreparable mistake. Either you are part of the problem or you are part of the solution. The decision is yours. Your children, neighbours, and fellow Canadians are watching.**

Sincerely,

G. Karpat
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