



By Email: iaac.baydunord.aeic@canada.ca

RE: Comments on the Environmental Impact Statement (EIS) and Summary for the Bay du Nord Development Project

September 13, 2020

To whom it may concern:

Please find attached our comments on the Environmental Impact Statement (EIS) and Summary for the Bay du Nord Development Project. Our comments largely focus on GHG emissions associated with the project and oil spill response capacity.

The IPCC's 2019 Production Gap Report concluded that the world's governments intend to exploit fossil fuels that are incompatible with a safe planet:

Oil and gas are also on track to exceed carbon budgets, as countries continue to invest in fossil fuel infrastructure that "locks in" oil and gas use. The effects of this lock-in widen the production gap over time, until countries are producing 43% (36 million barrels per day) more oil and 47% (1,800 billion cubic meters) more gas by 2040 than would be consistent with a 2°C pathway.¹

The Bay du Nord project would lock in production of fossil fuels for three decades. Canada has committed to meeting and exceeding its 2030 GHG emission targets and to becoming carbon neutral by 2050. Approving the expansion of the oil and gas industry that will contribute to the global production gap and lessen our capacity to meet provincial and federal climate commitments.

Even as climate impacts worsen, with this project the proponent intends to head into untested and dangerous waters. The proposed development project would occur in an entirely new ocean basin at depths five to ten times greater than those attempted thus far for a production project in Newfoundland's offshore. The project is located 450 km from shore in the North Atlantic, a region

¹ <http://productiongap.org/2019report/>

notorious for its rough weather and where sea ice is present for parts of the year. These conditions will only become more extreme as climate change impacts become worse.

The project is located in an area designated as a UN Convention on Biological Diversity Ecologically Biologically Significant Area (ESBA), and the Northeast Newfoundland Slope Closure and NAFO Fisheries Closure Areas are within the study area for the EIS. A large spill and the use of chemical dispersants threaten the rich fishing grounds of the Flemish Cap and Grand Banks, and could have impacts as far away as the Gulf of Maine. In spite of these high stakes, our expert's submission on oil spill preparedness indicates that there is no capacity to deal with oil spills at Bay du Nord.

Please find attached our comments that would improve the EIS and Summary document to truly encapsulate these risks to climate and the environment, focussing on the areas of :

- the proponent's approach to evaluating impacts;
- accurately and adequately assessing GHG emissions associated the project;
- potential markets for oil product; and
- oil spill preparedness and proposed response.

We appreciate this opportunity to comment on the Bay du Nord Production Project EIS, and sincerely hope you will consider and incorporate the information and comments provided, in order to accurately assess the environmental impacts of this project.

Sincerely,

<Original signed by>

Gretchen Fitzgerald

National Programs Director