

18 January, 2012

CNLOPB
via email

Re: Comments on Draft Scoping Document for Western Newfoundland and Labrador Offshore Area Strategic Environmental Assessment

The Ecology Action Centre has been involved in assessing the impacts of oil and gas activities on offshore Atlantic Canada for over twenty years. We appreciate that a SEA is a more comprehensive assessment than a project assessment, but it remains inadequate. The CNLOPB's request to the Federal Minister of the Environment for a panel review was a recognition that something larger and Gulf-wide was required.

In our view what is required is a Gulf-wide review on whether oil and gas activity should proceed anywhere in the Gulf. If one area of the Gulf is opened to oil and gas, all of the Gulf is effectively opened to oil and gas. If one activity, for example seismic blasting is permitted, all future activities are effectively approved or at least condoned. Oil and gas activity in the Gulf should not be segregated geographically or by activity. The Federal Government and the Government of Newfoundland and Labrador should not proceed with oil and gas activity off Western Newfoundland until a Gulf-wide review and decision has been made. Federal and provincial governments should ensure that First Nations are adequately involved and that the tourism, fishing and aquaculture industries have been fully consulted along with environmental groups and other interested stakeholders.

In Nova Scotia, the federal and provincial governments have conducted two reviews of whether Georges Bank should be opened up for oil and gas. Both times, the governments implemented a moratorium. Most recently the Government of Nova Scotia extended the moratorium on Georges Bank until 2023 without a review. We recommend a review similar to the 2000 Georges Bank Review for the entire Gulf. In part because we liked the answer, but primarily because we found the process to be rigorous, comprehensive, made good use of science and economic data, and ultimately left the decision in the hands of elected leaders.

We appreciate that the Board is now bound by the dictates of the instructions it has received from the two level of governments and is endeavouring to expand the scope of the scoping document. However, a SEA restricted primarily to waters off Western Newfoundland and with an emphasis on mitigation of primarily exploration activities is not the tool required for the job.

Sincerely,

Mark Butler
Policy Director