

Norris, Sara

From: Leslie Buckland-Nicks [REDACTED]
Sent: Thursday, September 26, 2013 6:40 AM
To: Information
Subject: Response to SEA update Draft Report

September 26, 2013

To: Canada-Newfoundland and Labrador Offshore Petroleum Board

Re: Western Newfoundland and Labrador Offshore Area Strategic Environmental Assessment (SEA) Update Draft Report

To Whom It May Concern,

The following comments are submitted in response to the SEA draft report which aims to be a tool for the C-NLOPB to evaluate if they should or should not go ahead in issuing offshore exploration licenses in the Gulf of St. Lawrence, and if so, what mitigation measures should be required. The comments are submitted on behalf of the Antigonish Harbour Watershed Association (AHWA), an active community based association in Antigonish, Nova Scotia, on the shores of the southern Gulf of St. Lawrence. AHWA concerns itself with environmental impacts on the Antigonish Harbour watershed and adjacent beaches. Our members sit on planning and liaison committees, participate in research and monitoring projects, make presentations at public education and awareness events on environmental issues, and network continuously with other civil society organizations with mandates related to sustainable development.

In summary, we do not support oil and gas exploration activities in the Gulf of St. Lawrence as a whole, or in the region offshore of Western Newfoundland and Labrador as described in the draft report. Our reasons focus on concerns for the integrity of the natural ecosystems and the livelihoods that they support; the lack of understanding and explanation regarding risks of accidents and their impacts; the need for a public review of the ability of operators to respond to spills and accidents; the lack of sufficient address of the use and risks of hydraulic fracturing.

1. The ecosystem of the Gulf of St. Lawrence is highly complex and much too important to the five provinces along its shores, to risk the impacts of seismic exploration, major blowouts and oil spills. We know that marine life in the Gulf is experiencing unusual stress with the changing climate, as was pointed out by AMEC. A study released by Dr. William Cheung and colleagues in 2013 showed that marine organisms are moving to cooler, deeper waters at an astounding rate and global fisheries are being impacted. It is impossible to predict how life in the Gulf will respond, but it seems very risky to add the many potential impacts of petroleum exploration including seismic testing, increased ship traffic, drilling, major and minor oil spills. The report by AMEC summarizes the importance of the many fisheries, and lists some of the species that use the Gulf as nursery, migratory routes or as critical feeding and rearing habitat. But it also points out key gaps in information about numbers and distributions of marine mammals, birds and sea turtles. Protecting the ecosystems of the Gulf of St. Lawrence makes much more economic sense than putting these systems at risk for the short term gains of petroleum extraction.

2. We cannot support the plan to allow petroleum exploration when the risks of accidents and the potential impacts are not fully researched, understood or explained. AMEC consistently states that a blowout or other

serious accident such as a large oil spill is "unlikely", but does not provide any idea of what this means, or what the consequences might be.

3. Decisions on proceeding with oil and gas exploration shouldn't be made until there is a public review of spill response capability of operators. As stated in the draft report "The C-NLOPB is also currently completing an overall review of the spill response capability of operators working in areas under its jurisdiction". We would like to see the final review made public.

4. Public concern about hydraulic fracturing is briefly discussed in the draft SEA report, but it does not place enough emphasis on this issue. Concerns by citizens about the negative impacts of hydraulic fracturing are based on well researched and described events. The draft report assumes that the concerns of citizens will be addressed through planning and design. It is our opinion that this is not the case at present, and there are far too many risks to water resources from hydraulic fracturing activities. Not only are the actual drilling procedures prone to accidents, but the transport, storage and disposal of fracking fluids pose serious problems.

Thank you for the opportunity to comment on the draft SEA report. We hope you take our views into consideration when making the final decisions about allowing petroleum exploration in this region of the Gulf of St. Lawrence and decide not to permit exploration activities.

Sincerely

The Antigonish Harbour Watershed Association

