



February 8, 2019

Attn: Christine Bonnell-Eisnor
Director, Regulatory Affairs & Finance
Secretary of the Board
Canada-Nova Scotia Offshore Petroleum Board
8th Floor, T.D. Centre
1791 Barrington Street
Halifax, Nova Scotia
B3J 3K9
Fax: (902) 422-1799
Email: callforbids@cnsopb.ns.ca

RE: Call for Bids NS18-3 and the Protection of Sable Island National Park Reserve

Dear Ms. Bonnell-Eisnor,

We are writing to to ask the Canada-Nova Scotia Offshore Petroleum Board (C-NSOPB) to withdraw call for Bids NS18-3 and to express our continued commitment to oppose oil and gas exploration and development in and around Sable Island Park Reserve. Since this Call for Bids was issued last fall, over 3300 letters of concern and outrage have been written to our federal and provincial leaders and the C-NSOPB to call for the withdrawal of the Call for Bids NS18-3.

Sierra Club Canada Foundation is a national, grassroots organization dedicated to empowering people to be leaders in protecting, restoring and enjoying healthy and safe ecosystems. Through our Atlantic Canada Chapter and national membership, we have acted to protect ocean spaces and ecosystems from the impacts of oil and gas exploration and development of almost two decades. Given the imperative to switch away from fossil fuels to stop runaway climate change and reverse rapid declines in biodiversity, we are calling for urgent reform to the current regulatory and impact assessment processes for offshore oil and gas in Atlantic Canada, which result in the facilitation of offshore oil and gas activities in Atlantic Canada. As part of the Offshore Alliance, we are part of a broad coalition calling for a public inquiry into offshore oil and gas regulation in Nova Scotia's offshore.

In addition to asking for this Call for Bids to be withdrawn, we are also asking that the Canada National Parks Act be amended to ensure Sable Island National Park Reserve is truly protected going forward, and not placed at risk from oil and gas exploration and drilling.¹ We believe drilling around and under Sable Island, and allowing oil and gas activities on

¹Canada National Parks Act, Section 41.3:- " Nothing in this Act prevents any activity in Sable Island National Park Reserve of Canada that is authorized by the Canada-Nova Scotia Offshore Petroleum Board under the Canada-Nova Scotia Offshore Petroleum Resources Accord

the island itself is inconsistent with the stated objectives of our cherished national park system, to ensure national parks are “protected for public understanding, appreciation and enjoyment, while being maintained in an unimpaired state for future generations.”²

A spill on or around Sable Island could have devastating and irreversible impacts on the island itself. We know we are ill-prepared to deal with such a spill. According to internationally recognized expert in oil spill risk assessment, Dr. Robert Bea, risk assessment performed for BP’s offshore drilling project off Nova Scotia was inadequate to accurately measure the risk of oil spills and that the consequences for of such a spill on the marine environment have been underestimated.³

Ongoing oil and gas activities will result in noise and chronic pollution that will impact the integrity Sable Island and nearby Sable Gully Marine Protected Area.

Seismic blasting associated with oil and gas exploration is a threat to the marine food web, creating dead zones for marine plankton (the base of the ocean food web and the early life stages of commercial fish and invertebrates), disrupting fish habitat, and damaging the ability if marine mammals to communicate, find mates and food. Given the precarious future of North Atlantic right whales and the proximity of these potential leases to habitat of the Northern bottlenose whale, disruption caused by seismic blasting could be devastating. Such is the alarm about seismic blasting that seventy-five scientists have called for a halt to seismic off the mid- and southeast Atlantic coast of the United States to prevent the extinction of right whales.⁴

Days before Call for Bids NS18-3 was issued, Parks Canada completed public consultations with Canadians regarding activities that would be allowed on the Island. We believe this Call for Bids is inappropriate given the ongoing process regarding activities Parks Canada will allow on the Island, and raises even more questions regarding the role of offshore boards in facilitating oil and gas development and the responsibility of the federal government to protect the environment, national parks, and fisheries.

We call on you to respect the integrity of Sable Island National Park reserve and withdraw this Call for Bids immediately.

Sincerely,



Gretchen Fitzgerald
National Programs Director

Implementation Act, and no authority under this Act is necessary in order to carry on any activity there that is authorized by that Board under that Act.”

² Parks Canada. <https://www.pc.gc.ca/en/pn-np>. [Accessed Feb 8, 2019.]

³ *I felt déjà vu looking at BP's proposals to drill offshore Nova Scotia*. National Observer. Dr. Robert Bea. May 9, 2018. <https://www.nationalobserver.com/2018/05/09/opinion/i-felt-deja-vu-looking-bps-proposals-drill-offshore-nova-scotia>

⁴ A Letter to President Obama on the Impact of Seismic Surveys on Whales. April 14, 2016. <https://nicholas.duke.edu/about/news/letter-to-obama-seismic-effects-whales>

CC:

The Honourable Catherine McKenna, Minister of Environment and Climate Change

The Honourable Jonathan Wilkinson, Minister of Fisheries and Oceans and the Canadian Coast Guard

Mr. Andy Fillmore, MP for Halifax-Sable Island