

Seafood Producers Association of Nova Scotia

P. O. Box 991, Dartmouth, N. S. B2Y 3Z6
 Phone: (902) 463-7790 Fax: (902) 469-8294
 E-mail: spans@ns.sympatico.ca

March 28, 2006

Mr. C. Andrew Parker
 Manager, Environmental Affairs
 Canada-Nova Scotia Offshore Petroleum Board
 6th Floor, 1791 Barrington St.
 Halifax, NS
 B3J 3K9

Dear Mr. Parker:

Andy

CNSOPB Rec'd	Date: MAR 28 2006
Description:	CAP/ET/BI/ND
	✓
	7775
	NSGeneral/ESS0,001
	30,008.21/30,008.22

Re: Canadian Superior Project Descriptions for Multi-Year Seismic and Exploration Drilling Activities

We are writing to provide initial comments on the Project Descriptions recently submitted to the Board by Canadian Superior for seismic and drilling on blocks 2409, 2415 and 2416 near Sable Island. Our comments are not focussed on environmental nor fisheries considerations of the proposed work, which are comments we will make when a complete Environmental Assessment of the proposed activity is released. Here we offer a concern about the temporal scope of the proposed environmental assessment.

Canadian Superior's proposed exploration drilling activity fits a typical multi-well approach to an environmental review as there are only a few wells involved, though the number of years to be assessed is very long.

The proposed seismic activity, however, covers a period of time and lack precision over that time to be adequately assessed. Canadian Superior is proposing to conduct a series of "individual surveys ... as early as 2006 and as late as 2013." (p. 1) Moreover, the seismic surveys could happen on any of the blocks, including waters in between, at any time over this period such that "[f]or the purposes of this assessment, it is assumed that any portion of these licences could be subject to seismic exploration at some point in the future." (p. 5)

We urge you to direct the proponent to be more precise in proposing the dates of activity when they prepare Environmental Assessments. The Project Descriptions' discussion of the fishery lack sufficient information to alert the proponent of potential interactions, though we recognize an EA will delve into greater detail in this regard. It is possible or even likely that harvesting patterns of the fishery could change extensively over the proposed seven year period, thus making the EA out of date for surveys in the latter years of the period.

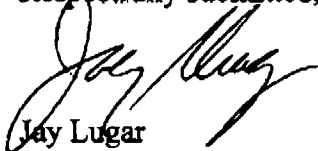
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We would prefer a separate EA for each year work is proposed. At a minimum, what is required is an update or review of the conclusions of the EA related to the fishery and the commercial fish stocks prior to exploration activity starting after 2007. These updates could incorporate the latest fishing effort data and biological studies to ensure there are no changes that require alternative approaches.

At the last FAC meeting you mentioned that your office and DFO would be meeting to discuss the scope of the EA the proponents would be asked to complete. Please incorporate shorter-term EAs or EA updates in the scope.

Thank you for the opportunity to comment.

Respectfully submitted,



Jay Lugar

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