

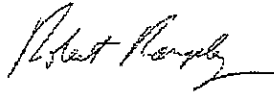


This EA illustrates the need for the adoption of WWF-Canada's *Conservation First* principle, which requires that conservation steps be sequenced in advance of development while the option still exists. A regional-scale, systematic approach to conservation planning is required to protect biodiversity on the Scotian Shelf. Such an approach will lead to the establishment of a network of marine protected areas (MPA) that captures representative samples of all habitat types as well as distinctive features, such as critical habitats for species at risk, spawning areas for commercially important species, hotspots of species diversity and cold-water coral aggregations. The proactive establishment of such a network would clearly set out where exploration activities would not be permitted and thus allow for long-term planning within the offshore petroleum sector. Proceeding with the proposed drilling program will impinge upon the ability to complete a network of MPAs that would help conserve biodiversity, sustain fisheries and secure a diversified economy in the region.

We would also like to draw your attention to the recent pollution events caused by petroleum exploration and extraction near Sable Island as a reminder that accidental spills do occur. These examples illustrate the need to use the precautionary approach when conducting offshore exploration and development activities. In the case of EL 2407, application of the precautionary approach would mean not approving the proposed drilling plan until the benthic environment has been adequately surveyed and species at risk concerns have been addressed.

Finally, we would like to restate our dissatisfaction with the EA Report prepared for the proposed drilling program in EL 2407. This program should not proceed prior to a detailed benthic habitat assessment of the area and until it is clear that the proposed drilling program will not negatively impact species at risk. Thank you for the opportunity to comment, and please contact us at any time to continue discussions.

Sincerely,



Robert Rangeley, Ph.D.  
Marine Program Director  
Atlantic Regional Office  
World Wildlife Fund Canada

Marty King  
Marine Conservation Analyst  
Atlantic Regional Office  
World Wildlife Fund Canada

Cc: Mr Andy Parker

## JD Roche

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**From:** Eric Theriault  
**Sent:** Friday, September 10, 2004 4:51 PM  
**To:** Document Control; Derek McDonald ; Friederike Kirstein (friederike.kirstein@ec.gc.ca); Phil Zamora (zamorap@mar.dfo-mpo.gc.ca)  
**Cc:** Andy Parker  
**Subject:** FW: EL2407 Submission

**Categories:** 30-008-14 / BA50-001



EL2407\_EA  
ort\_WWF Comment  
WWF Comments on the BEPCo EA.

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-----Original Message-----

From: Coburn Maclean [mailto:mcmaclean@wwfcanada.org]  
Sent: Friday, September 10, 2004 4:46 PM  
To: Eric Theriault  
Cc: Andy Parker; Marty King; Robert Rangeley  
Subject: EL2407 Submission

Dear Mr. Theriault,

Please find attached WWF-Canada's submission regarding the proposed drilling program for EL2407.

Regards,

Coburn Maclean

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