



Christine Bonnell-Eisnor  
 Acting Chief Executive Officer  
 Canada-Nova Scotia Offshore Petroleum Board  
 Via e-mail: [info@cnsopb.ns.ca](mailto:info@cnsopb.ns.ca)

22 December, 2021

Dear Ms. Bonnell-Eisnor,

We are writing regarding the draft Strategic Environmental Assessment (SEA) of the Eastern Scotian Slope and Sable Island Bank and the Board’s recent invitation for written comment between November 16 and December 17 on the draft SEA.

The Offshore Alliance calls on the Canada-Nova Scotia Offshore Petroleum Board and the responsible ministers to suspend and terminate the SEA. Further investment in this process is not needed.

The members of the Offshore Alliance support the appropriate use of SEA as a planning tool. However, we see the purpose of this and other SEAs conducted by the CNSOPB as facilitating and serving to legitimize offshore oil and gas development.

New oil and gas development is incompatible with Nova Scotia and Canada’s climate targets and caring for planet Earth.

**New Oil and Gas Development is Incompatible with Climate Targets**

In May 2021 the International Energy Agency stated that if the world wanted to limit global warming to 1.5C, there must be no new investment in fossil fuel supply projects.<sup>1</sup> In August 2021 the Intergovernmental Panel on Climate Change (IPCC) released its

<sup>1</sup> International Energy Agency, “Pathway to critical and formidable goal of net-zero emissions by 2050 is narrow but brings huge benefits, according to IEA special report” (May 18, 2021), online: <https://www.iea.org/news/pathway-to-critical-and-formidable-goal-of-net-zero-emissions-by-2050-is-narrow-but-brings-huge-benefits>.

Sixth Assessment Report calling for immediate, rapid, and large-scale reductions in greenhouse gas emissions. Dr. Andrew MacDougall, an associate professor of climate and environment at St. Francis Xavier University and an IPCC author, said recently that “if Canada is serious” about its *Paris Agreement* commitment to help meet the 1.5 degrees Celsius target, “there is no further need for oil and gas development. All of the fossil fuels that are necessary for the transition have already been found.”<sup>2</sup>

Various jurisdictions have banned oil and gas exploration and production activity, and otherwise clearly signaled their path to “net zero.”

### *Quebec*

“We have set ourselves the goal of reducing our GHG emissions by 37.5% from 1990 levels by 2030 and achieving carbon neutrality by 2050.

“To reach these objectives, Quebec must resolutely take the path of a green economy.

“The Quebec government has therefore decided to definitively renounce the extraction of hydrocarbons on its territory. We must therefore capitalize on our strengths while transforming our economy in depth.

“From now on, we will focus on electricity and renewable energies.”<sup>3</sup>

*New Zealand* effectively banned future oil and gas exploration permits in 2018 (with the exception of one terrestrial region, Taranaki on the North Island).<sup>4</sup>

### *British Columbia*

“In 1972, the Government of Canada imposed a moratorium on crude oil tanker traffic through Dixon Entrance, Hecate Strait, and Queen Charlotte Sound due to concerns over the potential environmental impacts. The moratorium subsequently extended to

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<sup>2</sup> Michael Tutton, “Federal parties fuzzy on offshore future as scientists call for end to extraction” (September 15, 2021), online: <https://atlantic.ctvnews.ca/federal-parties-fuzzy-on-offshore-future-as-scientists-call-for-end-to-extraction-1.558674>.

<sup>3</sup> Hon. François Legault, Premier of Quebec, “It’s Time For Quebec to Project Itself into the Future” (speech, October 20, 2021), online: <https://coalitionavenirquebec.org/en/blog/2021/10/20/now-is-the-time-for-quebec-to-project-itself-into-the-future/>.

<sup>4</sup> Parliamentary Commissioner for the Environment, “Restricting the production of fossil fuels in Aotearoa New Zealand: A note on the ban on new petroleum permits outside onshore Taranaki,” online: <https://www.pce.parliament.nz/media/197015/restricting-the-production-of-fossil-fuels-in-aotearoa-new-zealand-faqs.pdf> (undated).

include oil and gas activities. This was followed by a similar prohibition by the Government of British Columbia.”<sup>5</sup>

### *Denmark*

“Denmark, the European Union’s biggest oil producer, will stop offering new licenses in the North Sea and phase out production altogether in 2050.”<sup>6</sup>

Launched at COP26 in Glasgow by Costa Rica and Denmark, the Beyond Oil and Gas Alliance now includes France, New Zealand, the Republic of Ireland, Portugal, and Sweden, as well as Quebec, Greenland, Wales, and California.<sup>7</sup>

### **Suspend and Terminate Strategic Environmental Assessment**

The Offshore Alliance, which is made up of environmental and fishing groups, is calling for the end to offshore oil and gas activity and a just transition:

1. Governments need to plan and execute the orderly closure of all oil and gas activity in the Nova Scotia offshore, and ensure that any transition to offshore renewable energy is a just and sustainable transition<sup>8</sup>.
2. Specifically, all new offshore oil and gas exploration and development needs to be prohibited by 2022; and offshore oil and gas exploration and development needs to be phased out outright by 2025.

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<sup>5</sup> Royal Society of Canada, *Report of the Expert Panel on Science Issues Related to Oil and Gas Activities, Offshore British Columbia* (Ottawa: February 2004) at 135. Online: <https://rsc-src.ca/sites/default/files/fullreportEN.pdf>.

<sup>6</sup> Morten Buttler, “Denmark to End North Sea Oil Production in Milestone Deal” in *Bloomberg Green* (December 4, 2020), online: <https://www.bloomberg.com/news/articles/2020-12-03/denmark-ends-north-sea-oil-exploration-drops-production-in-2050>.

<sup>7</sup> See <https://beyondoilandgasalliance.com/> and International Institute for Sustainable Development, “IISD Welcomes Launch of Beyond Oil and Gas Alliance. Honoured to Host its First Permanent Secretariat” (November 11, 2021), online: <https://www.iisd.org/boga-launch>.

<sup>8</sup> The Canadian Centre for Policy Alternatives recently released a report detailing how other countries and sectors have developed and implemented transition plans. <https://www.policyalternatives.ca/sites/default/files/uploads/publications/National%20Office/2021/04/Roadmap%20to%20a%20Canadian%20just%20transition%20act.pdf>

The Alliance calls on the Federal and Provincial Government to suspend and terminate the SEA for Eastern Scotian Slope and Sable Island Bank. Further investment in this process is not needed.

We look forward to discussing the matter with you.

Sincerely,

Handwritten signatures of Gretchen Fitzgerald and John Davis in blue ink.

Gretchen Fitzgerald and John Davis, co-chairs, Offshore Alliance

Cc Hon. Jonathan Wilkinson, Minister of Natural Resources Canada  
Hon. Tory Rushton, Minister of Natural Resources and Renewables for Nova Scotia