



November 27, 2012

Canada-Nova Scotia Offshore Petroleum Board  
1791 Barrington Street  
18th Floor, TD Centre  
Halifax, NS, B3J 3K9

Dear Ms. MacDonald,

This letter is in response to the CNSOPB's request for feedback on the draft *Scoping Document for the Strategic Environmental Assessment for the Misaine and Banquereau Banks Eastern Scotian Shelf and Slope*.

The Canadian Offshore Arctic Surfclam fishery takes place on Banquereau Bank southeast of Nova Scotia and Grand Banks southeast of the island of Newfoundland. As noted in the draft document, the area described as 2A fully encapsulates Banquereau Bank and any offshore oil and gas exploration or drilling would have to consider impacts on this fishery during the Strategic Environmental Assessment (SEA) and full Environmental Assessment (EA) processes. At this time, I'd like to highlight several aspects of this fishery which will be critical for consideration.

Arctic Surfclams (*Mactromeris polynyma*) are long-lived, slow growing and sedentary. Individual animals do not reach commercial size on Banquereau Bank for approximately 15 years. The fishery is conducted very conservatively because there is recognition that a significant reduction in the biomass would not be recoverable in a few years, but may take decades to rebuild. It is with this in mind that the CNSOPB must consider the impact that potential offshore oil and gas exploration and development. Negative impacts from oil and gas exploration could have multi-year impacts on this fishery, from which it would not recover.

The offshore fishery is rotational in nature, with the focus of commercial activity changing over comparatively longer time scales than other commercial fisheries. The slow-growing nature of the species dictates that the fishery move away from harvested areas, returning only after juvenile clams have been given enough time to reach commercial size, a process that can take several years. Given this, the CNSOPB must consider fishing history for long time scales, up to decades, in order to accurately represent the scope and footprint of the fishery.

The commercial concentrations of clams that make the offshore fishery viable are fixed and any oil and gas activity that displaces fishing activity will result in a direct loss of access. Adult clams do not move and fishing activity cannot simply fish alternative grounds if kept from key clam beds. This will be particularly important to consider within the context of exploratory drilling.

I acknowledge that the draft document references the effects of operational discharges on commercial fish species in section 6.3.3. It does not, however specifically reference tainting, an impact that can have consequences not only the biology of the animal, but also its suitability as a food item as well as the consumer perception of the wild, sustainable, pristine product that the Canadian seafood industry

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provides. I recommend that the scoping document include a reference to this impact and make it a requirement for future consideration.

The Banquereau Bank fishing grounds are critically important for the success of the Canadian offshore Arctic Surfclam fishery. On Banquereau, clams exist in densities that are available nowhere else in Canadian waters. Densities of clams translate directly to catch rates, which are a critical factor to the economic viability of the fishery. In addition, areas on Banquereau Bank produce higher volumes of Grade A clams, those that are of highest value to customers. Independent economic analyses of the Arctic Surfclam fishery have indicated that Clearwater's clam business is highly sensitive to changes in revenue. Activities displaced from Banquereau would not be able to be recouped elsewhere and would jeopardize the viability of the entire Arctic Surfclam fishery.

I'd like to thank you for the opportunity to comment at this stage of the process and look forward to continuing to engage with the CNSOPB as the scoping document and the SEA is finalized. Please don't hesitate to contact me for further clarification.

Kind regards,

A handwritten signature in blue ink that reads "Catherine Boyd".

Catherine Boyd  
Manager of Sustainability and Public Affairs

## Colleen Garber

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**From:** Elizabeth MacDonald  
**Sent:** Wednesday, November 28, 2012 7:52 AM  
**To:** Eric Theriault; Keith Landra  
**Cc:** Document Control  
**Subject:** FW: Comments on scoping documents SEA areas 2A and 2B  
**Attachments:** 2012-11-27 CSLP letter to CNSOPB re SEA 2A & 2B.pdf

FYI

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**From:** Catherine J. Boyd [<mailto:CJBoyd@clearwater.ca>]  
**Sent:** Tuesday, November 27, 2012 4:27 PM  
**To:** Elizabeth MacDonald  
**Cc:** Christine Penney  
**Subject:** RE: Comments on scoping documents SEA areas 2A and 2B

Elizabeth,

Please see attached Clearwater's feedback regarding the Strategic Environmental Assessment for areas 2A and 2B.

Best,  
Catherine

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**From:** Elizabeth MacDonald [<mailto:EMacDonald@cnsopb.ns.ca>]  
**Sent:** Thursday, November 22, 2012 11:25 AM  
**To:** Catherine J. Boyd  
**Cc:** Christine Penney  
**Subject:** RE: Comments on scoping documents SEA areas 2A and 2B

Hello Catherine,  
Yes, this is not a problem. If you can provide comments by November 27<sup>th</sup> it would be greatly appreciated.  
All the best,  
Elizabeth

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**From:** Catherine J. Boyd [<mailto:CJBoyd@clearwater.ca>]  
**Sent:** Thursday, November 22, 2012 10:54 AM  
**To:** Elizabeth MacDonald  
**Cc:** Christine Penney  
**Subject:** Comments on scoping documents SEA areas 2A and 2B

Hello Elizebeth,

Clearwater would like to take the opportunity to comment on the current draft scoping documents for the strategic environmental assessment for areas 2A and 2B. Unfortunately I'm not sure I'll be able to have it completed by end of day today. I'd like to request an extension until the end of next week.

Please advise whether this is acceptable to the CNSOPB.

Best,  
Catherine



Let's talk  
seafood!

***Dedicated to Sustainable Seafood Excellence***

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