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**Comments on the Strategic Environmental Assessment for the  
Western Scotian Shelf (Phase 3A)**

Dear Ms. MacDonald,

Thank you for the opportunity to comment on the Strategic Environmental Assessment (SEA) for the Western Scotian Shelf offshore Nova Scotia. The Maritimes Energy Association supports the exploration and development of Nova Scotia's offshore petroleum resources through the robust regulatory regime represented by the Canada – Nova Scotia Offshore Petroleum Board (CNSOPB).

The Maritimes Energy Association is an independent, not for profit industry association representing businesses that provide goods and services to the energy sector in eastern Canada – offshore & onshore, renewable & non-renewable. Our membership primarily consists of local businesses that are part of the energy supply chain and employ thousands of people, injecting millions of dollars into our regional economy.

The Strategic Environmental Assessment (SEA) is an important step in the process of providing stakeholders the opportunity to identify and raise any concerns, comments or issues. It provides potential operators the information needed to make informed decisions on possible future activities. This allows for operators interested in conducting activities to know what mitigation measures are expected before deciding to invest in exploration and development activities in the area.

We recognize the importance of the Strategic Environmental Assessment process in providing information to the CNSOPB “with respect to potential issuance of future exploration rights” and “to identify general restrictions or mitigation measures that should be considered for application to consequent exploration activities within this area”.

Maritimes Energy supports the regulatory regime in place that contributes to safe operations offshore. We support the requirement of operators to prepare and submit contingency plans to “prevent, mitigate and respond to emergencies” prior to the initiation of activities.

The offshore oil and gas industry goes back almost 50 years in this region. Off Nova Scotia there have been more than 200 wells drilled and tens of thousands of kilometres of seismic data acquired. Over those five decades, there has been no indication of significant impact on the environment.

The history of safe operations offshore Nova Scotia can also be credited to the culture of safety that is demanded by the regulator, operators and instilled in the region’s supply chain. Having developed a world-class supply chain with nearly five decades of experience, regional companies provide services not only to projects offshore Nova Scotia but around the world.

This SEA is thorough in its scope and detail of the marine environment for the Western Scotian Shelf. It provides the key characteristics of the environment and identifies Valued Environmental Components in the studied area. The SEA reviews the potential impact of a wide range of petroleum activities in the studied area including such things as seismic acquisition, exploratory drilling, vessel traffic, and well abandonment. This information is critical as we move to the next steps.

It is important for those reviewing this document to make the distinction between this Strategic Environmental Assessment and the project-specific Environmental Assessment requirements demanded before activities commence. Prior to conducting any work offshore, a proponent must receive the necessary work authorizations from the CNSOPB. There are several requirements to receive such authorization including a Safety Plan, Environmental Assessment, and Environmental Protection Plan, among others. It is also important to note that offshore activities may trigger an Environmental Assessment under the *Canadian Environmental Assessment Act, 2012* which would further review any proposed projects.

The SEA is only one step in the regulatory process for future activity. It needs to be stressed that the SEA does not provide blanket environmental approval for offshore petroleum activity. Work authorization applications require several documents including a site specific EA, Environmental Protection Plan, Spill Contingency Plan, and Financial Security. The Board will review the submitted documents and must be satisfied with the information provided before it will issue work or activity authorization. Stakeholders have further opportunity to comment on potential activities throughout the regulatory process.

The Maritimes Energy Association supports the regulatory regime established under the *Canada-Nova Scotia Offshore Petroleum Resources Accord Implementation*

*Act, the Canada-Nova Scotia Offshore Petroleum Resources Accord Implementation (Nova Scotia) and the Canadian Environmental Assessment Act, 2012.*

Following a careful review of the Strategic Environmental Assessment for the Western Scotian Shelf, we agree with the conclusion of the SEA that any adverse environmental effects from activities can be managed to acceptable levels.

The Maritimes Energy Association supports the continued development of Nova Scotia's offshore resources and looks forward to the opportunity to comment on the next phase of the regulatory process in anticipation of future offshore oil and gas activities.

Thank you for this opportunity to comment.

Respectfully submitted,



Barbara B. Pike  
Chief Executive Officer  
The Maritimes Energy Association