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Canada-Nova Scotia Offshore Petroleum Board
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**Comments on the Strategic Environmental Assessment for the
Western Scotian Slope (Phase 3B)**

Dear Ms. MacDonald,

Thank you for the opportunity to comment on the Strategic Environmental Assessment (SEA) for the Western Scotian Slope 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 industry 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.

As stated in our comments on the Strategic Environmental Assessment (SEA) for the Western Scotian Shelf, the SEA process is beneficial to all stakeholders providing an opportunity for anyone with an interest in offshore activity to identify potential conflicts, concerns or issues. For those operators interested in conducting petroleum activities, the SEA provides important information on the environment and identifies potential mitigation measures that will be required in order to proceed with activities. Companies can then use this information to determine whether or not they are interested in the area knowing in advance any restrictions or additional measures that will be required.

Nova Scotia has a long history with offshore oil & gas operations going back almost 50 years. There have been tens of thousands of kilometres of seismic data acquired and more than 200 wells drilled, all with minimal impact. This SEA draws on these

five decades of experience and history to provide an overview of the environment on the Western Scotian Slope.

Those who oppose offshore petroleum development often ignore the industry's lengthy history in this region and neglect to mention there is no evidence of significant environmental impact as a result of these activities. Meanwhile, the offshore industry has contributed billions of dollars to the region's economy through royalties paid to the provincial and federal governments and the hundreds of millions spent by operators on goods and services provided by local business.

Success in any offshore development is not only tied to achieving production, but to ensuring that a project's environmental impact is minimized. The regulatory regime in place in Nova Scotia has ensured that any offshore operations are conducted under stringent regulation and supervision. Prior to any activity offshore, an activity authorization must be issued by the CNSOPB. The application for work authorization filed by an operator must include supporting documentation including an Environmental Protection Plan, Spill Contingency Plan, and an Environmental Assessment among others. These applications are specific to the work and to the site of the work. In addition, the regulator can add conditions on any work authorization to reflect site specific needs, best practices and latest technologies. It is important to note that this SEA does not provide blanket approval for offshore activities.

The existing regulatory regime is a significant factor in safe offshore operations, but the culture of safety demanded by operators and instilled in the supply chain is also a contributing factor. Companies recognize the importance of ensuring safety for both workers and for the environment. With decades of experience, businesses and operators recognize the importance of making safety the priority. This region has developed a world class supply chain capable of meeting strict safety standards. As local companies operate around the globe they bring with them the culture of safety that was developed in Atlantic Canada.

We recognize the importance of the Strategic Environmental Assessment as part of the process to provide 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".

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*.

The SEA is comprehensive in its review of the marine environment in the Western Scotian Slope. The document provides valuable detail on the environment and what mitigation measures are needed should activities proceed in the region.

The Maritimes Energy Association agrees with the conclusion of the SEA that adverse environmental effects from activities can be managed to acceptable levels within the project area. We fully support the regulatory regime in the Nova Scotia Offshore Area and look forward to the opportunity to comment on the next phase of the regulatory process in anticipation of future offshore activity.

Respectfully submitted,



Barbara B. Pike
Chief Executive Officer
The Maritimes Energy Association