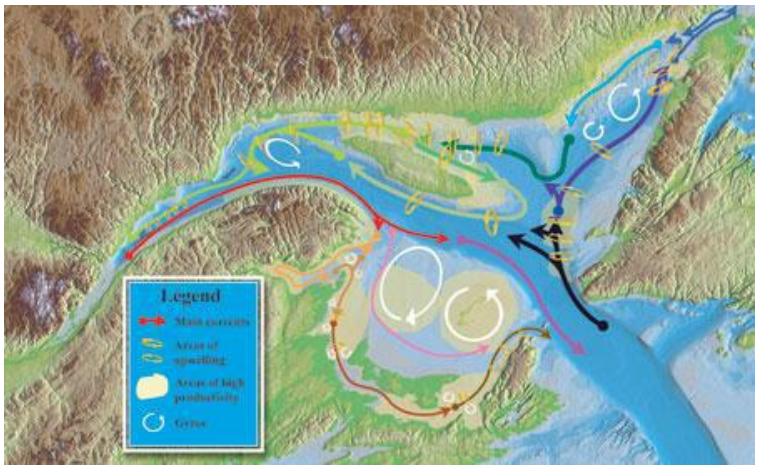
10 Reasons why drilling can't be allowed in the Gulf of St. Lawrence

1) <u>Semi enclosed sea, six times smaller than the Gulf of Mexico:</u> The Gulf of St. Lawrence is referred to by harvesters as the pond. The gulf is already in a highly industrialized region with a lot of land based sources of pollution such as heavy metals and pesticides. Allowing the oil and gas industry into the Gulf would add: thousands of barrels of drill cuttings, waste water, and continuous small spills.

2) <u>Counter clockwise currents</u>: Counter clockwise currents means that water has a tendency to go into the gulf and along the shorelines rather than go out towards the Atlantic. Although water mixing varies depending on the time of year it can take up to eight months for the Gulf of St. Lawrence to fully flush itself out.



3) <u>The proposed drilling prospect is in the Laurentian Channel:</u> The Laurentian Channel is the main vein of the Gulf Circulatory system. Other than the 9 mile wide straight of Belle Isle, the Laurentian Channel is the only point of entrance and exit for water coming into the Gulf of St. Lawrence. Any pollution from this location would enter fast moving water that feeds into a counter clockwise current heading for the coast.

4) <u>In the Gulf of St. Lawrence spills reach land:</u> The oil and gas lease that is furthest from shore is Old Harry. Lease 1105, is only 70 km to the Magdalen Islands, 80 km to Newfoundland, and 120 km to Cape Breton. Being within proximity to coast and virtually land locked by five provinces, common sense dictates that a spill in the Gulf of St. Lawrence will reach land. This claim is supported by simulations conducted by the David Suzuki foundation. In four out of four simulations oil reached the coast. Newfoundland is the most affected. *See* *http://www.davidsuzuki.org/issues/oceans/science/marine-planning-and-conservation/an-oil-spill-in-the-gulf-of-st-lawrence-could-threaten-five-provinces/*

5) Flawed regulatory structure: The current regulatory structure for the offshore in Canada out-dated. Norway, Australia, the UK and most recently the United States have found in necessary to dismantle the project promotion mandate from the environment and security mandate. In Canada where shared there are shared provincial-federal offshore powers and common waters, the objective separation of these competencies is all the more pressing:

   a- Shared jurisdiction demands access and transparency-The current regulatory structure developed for the Atlantic Ocean cannot be applied to a body of water shared by five provinces.

   b- Weak federal powers- Currently there are two offshore petroleum boards for Newfoundland and Nova Scotia. These were developed for Atlantic Ocean installations where shared jurisdiction is not an issue. In theory the boards are jointly managed between the federal and provincial governments. It is now common practise that decisions are made unanimously with the federal government allowing the provinces to take the lead on project development.

   c- No political accountability- The current framework applied to the Gulf where there is a shared jurisdiction could mean up to five petroleum boards over 500 km of water. With strong provincial powers the Gulf will resemble an international system where there is pollution but no political accountability. How are residents of PEI to discipline politicians in Quebec or Newfoundland when they have no access to their provincial legislatures where leases are being issued?

   d- No integrated approach- The lack of an integrated approach to a single body of water, in addition to being uncoordinated and ungovernable defies basic ocean management principles. What is the point of precautionary and ecosystem based approaches to fisheries management when they are not applied to all sectors equally?

6) Petroleum Boards are in a conflict of interest position: In the Offshore Safety Helicopter Inquiry, Honourable Robert Wells found that the Newfoundland Offshore Petroleum Board was in a conflict of interest position. By both promoting income generating projects and presiding over safety, the board challenges basic principles of governance. The argument developed by Wells is also applicable to environment. This is supported by the fact that the board has never turned down a project based on environmental reasons. This includes going ahead with development despite there being Species at Risk protected under federal law. *See* *http://www.cnlopb.nl.ca/ohsi_inquiry.shtml*

7) Oil Companies Self Regulate: Oil companies operating on the east coast of Canada self-regulate. They monitor their own spills and record the environmental effects of those spills. Oil companies do not have to disclose the environmental effects associated with their operations because they are protected by third party confidentiality clauses in the Atlantic Accords. http://www.thehilltimes.ca/page/view/offshore-02-07-2011

8) No way to keep track of cumulative environmental effects: Cumulative environmental effects, refers to environmental damage over time. In the Gulf of St. Lawrence there is no way to keep a record of cumulative effects for several reasons; knowledge gaps: by not knowing what we have, we cannot identify what we have lost. Knowledge gaps and laws protecting companies from disclosing environmental effects, are missing values in a formula which equals no way of attributing environmental damage to the oil and gas industry.

9) No compensation: On the east coast there are no compensation plans in place, and there is no environmental fund in case of a spill. In fact on Canada's east coast companies are protected with a liability cap of 30 million. Reparation leaves the person seeking compensation with the onus of proving damages. Without baseline comparatives to keep track of environmental effects a winning case is unlikely. http://www.montrealgazette.com/technology/drilling+moratorium+maintained/3023421/Major+offshore+spill+could+leave+taxpayers+hook+cleanup/3019768/story.html

10) Renewable Resources: With over 2000 marine species the gulf region, there is an abundance of renewable resources. Fishing and tourism are billion dollar industries that contribute to Gulf's five coastal provinces. Renewable resources last for generations and demand only environmental integrity in return. As recently witnessed in the Gulf of Mexico, in the event of an oil spill renewable resource sectors collapse. In the Gulf of Mexico for example, tourism was the largest employer. Because of its market segment tourism arguably affected the gulf region more than the fishery.

When thinking of renewable resources remember:

- The Newfoundland fishery still employs twice as many as the oil and gas industry;
- The tourism and fishery sectors keep coastal communities alive;
- The Gulf fishery has landings of 500 million and export value of close to 2 billion; and
- Tourism is a growing industry.

When comparing to the Gulf of Mexico remember:

- The Gulf of St. Lawrence has unique physical and political characteristics which makes drilling more precarious;
- By going ahead in the current regulatory framework, oil and gas is not coexisting with traditional resources sectors it is competing with it; and
- It is never a question of just one well- Keeping in mind that the Gulf of Mexico now has over 2000 wells; in a gulf one sixths its size allowing an oil and gas industry without first changing the context, will nullify our common resource potential.

When thinking of your children or grandchildren remember:

- Renewable resources come with a responsibility to future generations; and
- The people of today cannot in good conscience deprive their children of a healthy environment which generates the resources that people rely on for sustenance.