



**Comments on “The Scotia Basin Exploratory Drilling Project” Draft Environmental Assessment Report  
of the Canadian Environmental Assessment Agency**

**December 2017**

Founded in 1985, the Council of Canadians is Canada's leading social action organization, mobilizing a network of 50 chapters across the country. Through our campaigns we advocate for clean water, fair trade, green energy, public health care, and a vibrant democracy. We educate and empower people to hold our governments and corporations accountable. The Campaign to Protect Offshore Nova Scotia (CPONS) is a project of the Council of Canadian's South Shore chapter. Members of this grassroots group live in the region that will be most affected by the results of regulatory decisions concerning BP's proposed Scotia Basin Exploratory Drilling Project.

As a national organization with over 100,000 supporters, the Council of Canadians wants to take this opportunity to affirm the very serious questions and criticisms that CPONS raises regarding the draft Environmental Assessment Report and list of conditions for BP's exploratory project. These are articulated in CPONS submission to this public comment process.

In particular, this includes criticism of a 30 days blow-out worst case scenario, lack of requiring a capping stack within 24 hours (as is the requirement in Alaska), and the lack of precedent in dealing with wells at this depth, which are even deeper than the Deepwater Horizon project.

We also share CPONS concerns with the lack of awareness in the region of the project being proposed and its considerable consequences, and the insufficient time allowed for adequate public consultations. CPONS is calling for hearings to take place in a number of affected communities with independent publicly-funded, public interest cross-examination of industry representatives as well as government experts and the ability to call on independent expert witnesses.

We add to CPONS submission our concerns with the Canadian Environmental Assessment Agency as inadequate in documenting and considering potential climate impacts of this proposal. There is a need to assess the potential greenhouse gas emissions that could result from the exploration proposal and subsequent project development in order to understand if it is consistent with Canada's federal policy commitments and international obligations.

New fossil fuel exploration and development is increasingly being recognized as incompatible with efforts to stay within global climate limits established in the Paris Agreement goals. For example, the French government recently passed a law to ban all new licences for oil and gas exploration and ending oil and gas extraction before 2040.

Critically, there is a need for CEEA to participate in a strategic environmental assessment on climate change impacts to fully understand how climate risk factors into the environmental assessment process.

France's action responds to the moment in history we find ourselves in. As stated in the Lofoten Declaration the Council of Canadians recently endorsed, we are in a deep hole with our climate. While a full transition away from fossil fuels will take decades, we must begin by not digging ourselves any deeper.

It is time to stop further exploration and development of fossil fuels as part of addressing the climate change crisis. In particular, Canada, like other countries with access to unconventional fossil fuel resources, must put an end to industry's ambitious expansion plans.

An important study featured in the *Nature Journal*, concluded that “development of resources in the Arctic and **any increase in unconventional oil production** [emphasis added] are incommensurate with efforts to limit average global warming to 2°C. Let alone the 1.5° target the Canadian government supported in the Paris Climate Agreement.”

Offshore drilling – the purpose of BP’s proposed exploration – is indeed unconventional and should not be allowed.

Sincerely,

A handwritten signature in black ink, reading "Andrea Harden-Donahue". The signature is written in a cursive style with a long horizontal line extending from the end.

Andrea Harden-Donahue  
Energy and Climate Campaigner  
The Council of Canadians