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# OCEANA CANADA'S RESPONSE TO CALL FOR PETROLEUM EXPLORATION BIDS AROUND THE SCOTIAN SHELF



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Re: Call For Bids NS22-1

On behalf of Oceana Canada we are writing to express our significant concerns with the recent Call for Bids NS22-1, and the location of parcels open for bidding in the affected offshore area. These areas contain unique and sensitive submarine canyon environments and represent critically important habitat for sensitive benthic fauna, as well as a high diversity of fish.

Specifically, the nominated parcels overlap with Significant Benthic Areas (SBAs) identified for small and large gorgonian corals, sea pens, and sponges.<sup>1</sup> Exploratory drilling disturbs benthic substrate and releases discharge made up of dense particulates that can rapidly accumulate in these species and affect their filter-feeding and reproductive abilities.<sup>2</sup> The extremely slow growth rates of corals and sponges mean that the impacts of breaking, burying or otherwise damaging corals and sponges may persist for many years.<sup>3</sup> Such impacts extend beyond just affecting corals and sponges, as many fish, invertebrates and mammals rely on their enhanced productivity.

The parcels overlap with Ecologically and Biologically Significant Areas (EBSAs).<sup>4</sup> The Scotian Slope EBSA contains four submarine canyon features which represent high productivity areas and provide a variety of habitat types for the many species that utilize canyon environments (and associated corals and sponges) for feeding, spawning or shelter.<sup>5</sup> This includes not only commercially important species such as Atlantic halibut or lobster but also several at-risk fish species like cusk, white hake and thorny skate. Impacts to fish, larvae and fish habitat may be caused by acoustic stress or sediment disruption and can extend beyond the well site.

The Scotian Slope EBSA is an important migratory pathway for several Species At Risk Act (SARA)-listed species including leatherback turtles, North Atlantic right whales, Sowersby's

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<sup>1</sup> DFO (2017) Delineation of Significant Areas of Coldwater Corals and Sponge-Dominated Communities in Canada's Atlantic and Eastern Arctic Marine Waters and their Overlap with Fishing Activity. DFO Can. Sci. Advis. Sec. Sci. Advis. Rep. 2017/007.

<sup>2</sup> Fernandez-Arcaya U, Ramirez-Llodra E, Aguzzi J, Allcock AL, Davies JS, Dissanayake A, Harris P, Howell K, Huvenne VA, Macmillan-Lawler M, Martín J (2017) Ecological role of submarine canyons and need for canyon conservation: a review. *Frontiers in Marine Science* 4:5. <https://doi.org/10.3389/fmars.2017.00005>

<sup>3</sup> Cordes EE, Jones DO, Schlacher TA, Amon DJ, Bernardino AF, Brooke S, Carney R, DeLeo DM, Dunlop KM, Escobar-Briones EG, Gates AR (2016) Environmental impacts of the deep-water oil and gas industry: a review to guide management strategies. *Frontiers in Environmental Science* 16;4:58.

<sup>4</sup> King M, Fenton D, Aker J, Serdynska A (2016) Offshore Ecologically and Biologically Significant Areas in the Scotian Shelf Bioregion. DFO Can. Sci. Advis. Sec. Res. Doc. 2016/007. viii + 92 p.

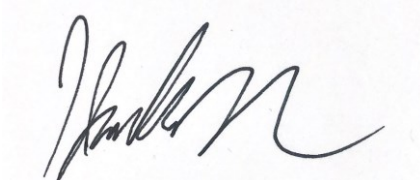
<sup>5</sup> Ward-Paige CA, Bundy A (2016) Mapping Biodiversity on the Scotian Shelf and in the Bay of Fundy. Fisheries and Oceans Canada, Ecosystems and Oceans Science.

beaked whales and blue whales<sup>4</sup>. Increased shipping traffic to and from the offshore site poses increased risk of collisions between vessels and cetaceans, a leading cause of mortality for North Atlantic right whales and other whales<sup>6</sup>. Chronic anthropogenic noise from exploration and drilling activities can mask whales' ability to communicate, forage and avoid predators, and can affect whales several kilometres from the sound origin. Finally, a heightened chance of spills or release of toxic petroleum products poses a substantial risk of catastrophic effects to all marine species in the area, from the smallest invertebrates to the largest sharks and whales.

The close proximity of the parcels to The Gully, the Haddock Box fishery closure and the newly established Eastern Canyons Conservation Area brings about the potential for those protected areas to be negatively affected by exploratory drilling activities in their immediate vicinity. The adjacency of the nominated parcels, and potential downstream impacts from exploratory drilling nearby such as the increased risk of spills, may threaten the conservation objectives of those other designated spatial management measures.

Exploration for, and development of, petroleum resources in these areas put forward for bidding will put fish stocks, marine mammals and sensitive benthic fauna like corals and sponges at significant risk of long-term detrimental effects. Although the parcels of the Scotian Slope are not covered by any legal protection status, the potential for long-lasting ecosystem damage within the nominated parcels is high. Management recommendations for oil and gas activity emphasize avoidance of ecologically or biologically sensitive areas as the primary mitigation measure to eliminate all possibility of negative effects on habitats and species.<sup>7</sup> To call for bids in areas of particular vulnerability is inadvisable and undermines efforts to create an effective network of protected areas in Atlantic Canada.

Thank you,



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<sup>6</sup> Mullen KA, Peterson ML, Todd SK (2013) Has designating and protecting critical habitat had an impact on endangered North Atlantic right whale ship strike mortality?. *Marine Policy* 42:293-304.

<sup>7</sup> DFO. 2019. Assessment of the Effectiveness of Mitigation Measures in Reducing the Potential Impacts of Oil and Gas Exploration and Production on Areas with Defined Benthic Conservation Objectives. DFO Can. Sci. Advis. Sec. Sci. Advis. Rep. 2019/025.