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Submitted via Email to Erin Stapleton, [erin.stapleton@canada.ca](mailto:erin.stapleton@canada.ca)

**RE:** Comments & Recommendations regarding the Draft *Eastern NF Regional Assessment - Module 14: Atmospheric Environment: Overview of Potential Effects* prepared as part of the Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador

November 6, 2019

To Members of the Committee undertaking the Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador:

Please find attached comments and recommendations prepared by Sierra Club Canada Foundation with regard to the literature review on the Atmospheric Environment (Module 14) performed as part of the Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador.

Sierra Club Canada Foundation is a national grassroots organization that empowers people to be leaders in protecting, restoring and enjoying healthy and safe ecosystems. Our organization has worked for over two decades to reduce the impacts of offshore oil and gas on marine ecosystems, species at risk (including endangered whales), and climate change.

Estimates performed by the Ecology Action Centre indicate the proposed expansion of the offshore oil and gas industry in Newfoundland and Labrador will contribute the equivalent of 9.93% of the global carbon budget that would allow us to stay below 1.5 degrees of warming,<sup>1</sup> the equivalent of running 4.949 billion gas-fired cars for a year.<sup>2</sup> As we have previously stated, issues relating to GHG emissions must be viewed and treated with the seriousness they deserve in light of the fact that we are currently living in a climate crisis – a fact that has been acknowledged at many levels of government in Canada.

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<sup>1</sup> Total for NL Offshore petroleum resource potential projected in *The Way Forward on Oil and Gas, Advance 2030 A Plan for Growth in the Newfoundland and Labrador Oil and Gas Industry* ([https://www.nr.gov.nl.ca/nr/advance30/pdf/Oil\\_Gas\\_Sector\\_FINAL\\_online.pdf](https://www.nr.gov.nl.ca/nr/advance30/pdf/Oil_Gas_Sector_FINAL_online.pdf)) is 37 Million Barrels of Oil and 133 Trillion Cubic Feet of Natural Gas, which extracted and burned would emit 23.238 Billion tonnes of CO<sub>2</sub>e.

<sup>2</sup> To put this number in perspective, Canada has about 22 million cars today and globally there are approximately 1 Billion cars in total on Earth right now.

In addition to discounting the global implications of increasing offshore oil and gas production, the draft Module downplays emissions associated with drilling operations themselves. Government of Canada data indicates that GHG emissions from a single, average platform are equal to approximately 500,000 tonnes CO<sub>2</sub>e per year in the Atlantic offshore region. In light of the province's goal of more than doubling oil production by 2030 to 237 million barrels annually, and the fact that the province's 2030 GHG emissions target is 6.9 MT, offshore oil production projects alone will represent 71% of provincial emissions, presuming targets are met. Given these realities, it is difficult if not impossible to see how anyone can describe the potential emissions from oil and gas platforms as "insignificant in comparison to GHG targets", as stated in the draft Module.

The approach taken in the draft Module, which does not correctly gage contributions to global, national, and provincial climate targets, much less place a limit on allowable GHG emissions, is unacceptable and may violate the terms of the Regional Assessment. Inadequately assessing and incorporating the climate implications of projects was part of the motivation for the overhaul of the impact assessment legislation in Canada, resulting in the new *Impact Assessment Act, 2019*.<sup>3</sup> It is appropriate and consistent from this perspective that limits to GHG emissions be incorporated in the Regional Assessment's research, recommendations, and methodology, and that the assessment accurately evaluate contributions of exploration and development on our climate commitments.

As you know, we also have overarching concerns with regard to the regional assessment process and accelerated timeline, and its objective of facilitating the rapid expansion of offshore oil and gas in Canada, and have requested the Regional Assessment be given a longer timeframe to complete its important work, fully incorporate the implications of proposed projects, and improve opportunities for public participation and consultation with indigenous peoples. Although we are continuing to participate in this process, we wish to be clear that these concerns remain and we hope they will be addressed.

We sincerely hope these comments will be incorporated in the Regional Assessment to improve our ability to address the climate crisis.

Yours truly,

<original signed by>

Gretchen Fitzgerald  
National Programs Director

**Attachment:** Comments & Recommendations on the Draft *Eastern NF Regional Assessment - Module 14: Atmospheric Environment: Overview of Potential Effects*.

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<sup>3</sup> "Canadians became concerned that project approvals were based on politics rather than robust science. There were concerns that changes were putting our fish, waterways, and communities at risk and we are not taking into account the climate impacts of projects." Minister of Environment and Climate Change, Catherine McKenna, House of Commons, February 14th, 2018. (<https://openparliament.ca/debates/2018/2/14/catherine-mckenna-3/only/>)