

Noia Submission to the Canadian Environmental Assessment Agency Re: EIS Summary of the Equinor Canada Exploration Drilling Project in the Central Ridge Area February 2020

ceaa.centralridge.acee@canada.ca

The Newfoundland and Labrador Oil and Gas Industries Association (Noia) was founded in 1977 to represent the supply and service sector of the offshore oil and gas industry. Today, Noia represents over 500 member organizations worldwide which are involved in, or benefit from, the oil and gas industry of Newfoundland and Labrador. Noia members are a diverse representation of businesses that range from offshore supply boats and helicopters to health and safety equipment and training, engineering solutions and fabricators to law firms, personnel agencies and golf courses.

Noia is pleased to have the opportunity to comment on the abridged Environmental Impact Statement Summary of Equinor Canada (Equinor) for exploratory drilling in exploration licences (ELs) 1159 and 1160. Equinor is partnered with Husky Energy and Suncor Energy for this project located 375 kilometres east of St. John's.

In June 2019, Noia made a submission on the project description and supported the project. That support remains as a result of the abridged environmental impact statement summary. Noia previously outlined the socioeconomic impacts of the offshore oil and gas industry and will not repeat that information.

Noia does believe it is important to note that in the intervening period between the project summary and the EIS summary a draft regional assessment has been made public. That report also highlights specific benefits of exploration drilling, including \$221.7M spent on exploration drilling programs in Newfoundland and Labrador in 2017, generating 3,136 person-months of employment.

Further, the draft regional assessment outlined – as has been indicated in numerous environmental assessment processes – that through decades of experience and standard mitigation processes exploratory drilling programs do not pose significant risk of adverse effects.

Noia agrees that exploration activities have a history of over two decades in the offshore of Newfoundland and Labrador with stringent federal regulations and mitigation practices in place. Further, the role of the C-NLOPB as life-cycle regulator has been effective due to extensive experience and knowledge accumulated over two decades of involvement with the offshore. It is important to note that environmental safety is a core function of the C-NLOPB, which is also a founding member of the International Offshore Petroleum Environmental Regulators (IOPER), a collaborative group of national regulators whose focus is to drive improvements to environmental performance in the global offshore petroleum and exploration industry. During 2016-17, the focus of IOPER was on environment performance indicators, regulating oil spill preparedness and response, as well as public consultation and decision making.

The draft regional assessment also states it is "considered unlikely" that offshore exploratory drilling in the region would "hinder" Canada's ability to meet its emission targets.

Conclusion

Noia supports an ocean economy where all the ocean industries work together for the socioeconomic benefit of the nation and where activity is undertaken in an environmentally conscious manner. The various industries involved in the ocean economy can co-exist and they can do so in a manner that takes into consideration protection of all ocean resources. This has occurred for decades offshore Newfoundland and Labrador and will certainly continue in the best interest of all Canadians.

Noia also is cognizant of the responsibility of all participants in the ocean economy to practice environmental stewardship, conservation, and protection. There is an onus upon everyone engaged in the offshore oil and gas industry to protect people, marine life and habitat, marine birds and mammals and all wildlife.

The potential of our ocean economy is both staggering and inspiring and we must strive to provide opportunities and support environmental stewardship that is based upon scientific evidence.

Noia submits that the information outlined above should be considered when determining if the proposed drilling project of Equinor in ELs 1159 and 1160 is to undergo an environmental assessment. Given this information, Noia supports the proposed exploratory drilling program.

Sincerely,

<Original signed by>

Charlene Johnson CEO Noia