

# Comments Received Respecting the Georges Bank Moratorium Area: 2022

April 27, 2022

In 2021, Natural Resources Canada and the Nova Scotia Department of Natural Resources and Renewables commissioned the *Science and Socio-economic Review of the Georges Bank Prohibition Area 2020-2021*. The Report, coordinated by NetZero Atlantic (formerly OERA) and completed by Stantec Consulting Ltd., provides an update to the status of knowledge in this area. The Report is available here: <https://oera.ca/research/science-and-socio-economic-review-georges-bank-prohibition-area-2020-2021>

In early 2022, Governments shared the Stantec Report with environmental organizations and municipalities throughout Southwest Nova Scotia that had previously expressed reached out to Governments regarding the Moratorium. In addition, Governments also sought feedback on the report, and other factors the Ministers should consider in their decision, from Mi'kmaq communities in Nova Scotia.

Officials from Natural Resources Canada and the Nova Scotia Department of Natural Resources and Renewables also provided regular updates to the Canada-Nova Scotia Offshore Petroleum Board's Fisheries Advisory Committee in 2021 and 2022. The Fisheries Advisory Committee has a membership of approximately two dozen members, and includes representatives from various fishing groups, First Nations organizations, and federal and provincial departments. Members of this committee also received a copy of the report and were provided an opportunity to provide additional information to Ministers to inform their decision regarding the Moratorium.

Attached are letters that Governments received in response to this targeted outreach. Governments thanks those for their feedback.

**From:** [REDACTED]  
**To:** [Georges Bank Moratorium Review](#)  
**Subject:** FW: Georges Bank Report to FAC  
**Date:** January 25, 2022 2:09:14 PM  
**Attachments:** [Georges Bank Report.pdf](#)  
[FisheriesAdvisoryCommittee\\_Georges Bank.pdf](#)

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**\*\* EXTERNAL EMAIL / COURRIEL EXTERNE \*\***

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This is meant to confirm that the *Nova Scotia Seafood Alliance*, who represents 135 shore based seafood dealers in Nova Scotia fully support extending the Georges Bank Oil and Gas Moratorium indefinitely.

We realize the decision needs to be made prior to Dec 31, 2022 and if you have any questions or would like to talk about the reasoning for our position you can contact me directly.

**Leo Muise**  
Executive Director  
Phone: [902.229.1029](tel:902.229.1029) Fax: 902.742.8391



**From:** [REDACTED]  
**Date:** Tue, Jan 18, 2022 at 3:30 PM  
**Subject:** Georges Bank Report to FAC  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
[GeorgesBank@novascotia.ca](mailto:GeorgesBank@novascotia.ca) <[GeorgesBank@novascotia.ca](mailto:GeorgesBank@novascotia.ca)>

Hi folks

Please see attached a copy of the Georges Bank Report, *Science and Socio-economic Review of the Georges Bank Prohibition Area 2010-2021* and a letter from Alison Tracy with the Nova Scotia Department of Natural Resources and Renewables and Tim Gardiner with Natural Resources Canada respecting the Georges Bank Moratorium Area. I am forwarding the information to FAC members in response to a request from both governments.

As per the letter, any comments or information FAC members wish to share with Ministers should be

sent to [GeorgesBank@novascotia.ca](mailto:GeorgesBank@novascotia.ca).

Thanks

[REDACTED]

[REDACTED]

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[REDACTED]

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**From:** [Seafood Producers](#)  
**To:** [Georges Bank Moratorium Review](#)  
**Subject:** Georges Bank Report to FAC  
**Date:** January 31, 2022 10:42:26 AM  
**Attachments:** [image.png](#)

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Dear Sir or Madam

Please accept these comments by the Seafood Producers Association of Nova Scotia (SPANS) on the "Science and Socio-Economic Review of the Georges Bank Prohibition Area 2010 – 2021" (the Georges Bank Report) completed by lead author Stantec in association with Gardner Pinfold on November 12, 2021. SPANS is an industry trade association representing the interests of members active in fisheries taking place on Georges Bank. The scallop operations of SPANS members are dependent on access to the uniquely productive fishing grounds that exist on Georges Bank.

The Georges Bank Report is intended to inform Minister of Natural Resources Canada Jonathan Wilkinson and Minister of Natural Resources & Renewables Nova Scotia Tory Rushton prior to the Ministers' decision concerning extension of the Georges Bank Moratorium beyond December 31, 2022. The Georges Bank Report fulfills the legislated requirement to update the state of knowledge since the last review in 2010.

SPANS appreciates the opportunity to add our comments to the Georges Bank Report for consideration by the Ministers.

The Report points out that (1) the key species of importance remain the same, (2) there are fewer active fishers and vessels compared to 20 years ago, (3) the fishery remains as important to the economy of SWNS as in 1999, and (4) key issues and concerns remain relevant.

The scallop resource on Georges Bank is of paramount importance to SPANS members. While the numbers of scallop vessels and fishers have decreased, it is important to emphasize that SPANS members have replaced scallop wet fish trawlers with vessels which freeze at sea. Investment in and dedication to this fishery are all all-time highs. SPANS members are significant stakeholders in the sustainability of the resource and are dedicated to operating within the precautionary approach adopted by DFO. SPANS members are major employers and key economic drivers for many coastal communities referred to in the report, such as Lunenburg, Riverport, Lahave, Liverpool Lockeport, Shelburne and Saulnierville. While some shore based jobs have shifted to new freezing at sea vessels SPANS members continue to utilize the local workforce for these positions and have made significant investments in local communities to upgrade processing and distribution for scallop harvested from Georges Bank. This is to say that the fishery is at least as important to the economy of South West Nova Scotia as it was when the moratorium was enacted in 1988 and as it has been continuously since then. The key issues and concerns remain relevant today.

To understand the uniqueness of Georges Bank, it is necessary to emphasize points made on page 5 of the Report. High levels of phytoplankton contribute to greater resource recruitment for various species of groundfish, scallop, and lobster. The currents create a clockwise gyre that in normal times distribute this productivity throughout this ecosystem but could just as likely widely distribute an oil spill blowout across the entire Georges Bank, wiping out the economic prosperity of the fishery that has been in place for hundreds of years.

We have not seen definitive evidence of a lack of impact on juveniles from seismic energy. Current work by the Environmental Studies Revolving Fund continues, but not on species such as scallop. Work by the Multi-Partner Research Initiative to enhance the understanding of newer additions to the oil spill cleanup toolkit is incompatible with our desire to maintain a pristine and clean ocean ecosystem.

Scallop resources are essentially fixed on Georges Bank. Hence, depending on the specific location of oil and gas exclusion zones around rigs and pipelines, there is a lesser or greater loss of access issue. This is crucial to our interests. Filter feeders including scallops are highly sensitive to certain components of drilling muds (for example barite and bentonite) so this aspect of drilling increases the effective loss of access and is potentially harmful to the benthic environment impacting the resource for generations.

We take little consolation in the assertion that lessons of the British Petroleum Deepwater Horizon/Macondo well blowout in the Gulf of Mexico in April 2010 will be helpful should drilling take place on Georges Bank in the future. While we agree there have been lessons learned, we do not believe these necessarily translate into actual improvements that mitigate our concerns.

First, while we concur that the regulatory policies implemented by the CNSOPB have tightened up since 2010, the actual benefits of the enhanced regulatory framework (an increased pollution insurance commitment by the offshore oil and gas operator, for example) will be of little to no help to those active on Georges Bank in the event of a blowout that wipes out the scallop and lobster stocks and that then affects the more mobile groundfish as the plume circles Georges Bank in the gyre. The Georges Bank ecosystem is so unique that in every month of the year at least one species is reproducing. There is no good time to have an oil spill on Georges Bank. We have consistently argued that the compensation regime in both CNLOPB and CNSOPB areas of responsibility is inadequate. As the Report points out, the compensation program does not address resource impacts or benthic damage repair.

Second, a much trumpeted lesson from the Macondo well blowout, is the advance in well blowout management brought about by capping stacks. While it is a fact that a capping stack can shut in a well that otherwise continues to spew oil into the marine environment, we have to be realistic. Capping stacks are now staged in several areas of the world (see chart below), but at this time there is none in Atlantic Canada. The closest capping stack could not be deployed quickly enough to avoid significant and long-term damage to the scallop resource on Georges Bank. A blowout of two to three weeks before arrival of a capping stack, if all goes right, is too late to be of use to those dependent on the fishery resources of Georges Bank.





A third lesson from Macondo is the addition of a new range of “tools” to the traditional oil spill toolkit of booms and burning of oil on the sea surface. Macondo experimented with the use of a particular kind of spill agent known as dispersants. In particular, at Macondo the sub-sea injection of the dispersant Corexit 9500 was pioneered and at a large scale (it’s now banned in over two dozen countries). The use of chemical dispersants to mitigate oil slicks is incompatible with the scallop fishery on Georges Bank. Dispersing the crude oil from the ocean surface so it remains in the water column or coats the ocean floor would devastate scallop recruitment and growth. For all those resources which live in the water column or rely on the health of the benthic environment, the use of dispersants is a disaster. For those employees and enterprises depending on the health and availability of those fishery resources, it is an unmitigated disaster. There remains debate about the relative toxicity of crude oil, the dispersant itself, and the mixture of the two. To fishing industry participants, for as long as this pollution remains in the environment and is bioavailable, we bear the burden of oil and gas exploration and production gone awry and addressed by dispersants.

Our industry relies on the market perception of our product being harvested in the cold, pristine waters of Atlantic Canada. Removing the currently held market perception, even for a short period, would ravage our industry.

We agree in part with the final sentence of the Report on page 83: Despite concerns, successful co-existence of fisheries and petroleum activities has been demonstrated in Nova Scotia’s offshore. SPANS has cooperated with the offshore oil and gas industry over its history on the Eastern Scotian Shelf and will continue to do so. Georges Bank is simply too unique and too important to risk by lifting the moratorium on offshore drilling – “No Rigs on Georges” means just that.

Thank you for the opportunity to provide comments. Please feel free to contact us for clarification on anything in this letter.

Sincerely,  
Roger C. Stirling  
President

----- Forwarded message -----

From: [REDACTED]  
Date: Tue, Jan 18, 2022 at 3:30 PM  
Subject: Georges Bank Report to FAC  
To: [REDACTED]

Hi folks

Please see attached a copy of the Georges Bank Report, *Science and Socio-economic Review of the Georges Bank Prohibition Area 2010-2021* and a letter from Alison Tracy with the Nova Scotia Department of Natural Resources and Renewables and Tim Gardiner with Natural Resources Canada respecting the Georges Bank Moratorium Area. I am forwarding the information to FAC members in response to a request from both governments.

As per the letter, any comments or information FAC members wish to share with Ministers should be sent to [GeorgesBank@novascotia.ca](mailto:GeorgesBank@novascotia.ca).

Thanks

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YOU.



Naturally Yours

136 Hammond Street, PO Box 280 Shelburne, NS BOT 1WO  
Phone: (902) 875-3544 - Fax: (902) 875-1278

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February 3, 2022

Alison Tracy  
Director, Strategic Priorities  
Nova Scotia Department of Natural Resources and Renewables

Tim Gardiner  
Senior Director, Offshore Petroleum Management  
Natural Resources Canada

Dear Alison Tracy and Tim Gardiner:

**Re: Georges Bank Moratorium**

Thank you for the opportunity to provide comments regarding the Georges Bank Moratorium. We are aware that the decision to renew the moratorium must be made by December 31, 2022.

In March 2021, Council of the Municipality of the District of Shelburne wrote to the Minister of Department of Natural Resources, stating our unanimous support for the extension of the Georges Bank Moratorium for at least another 10 years, if not permanently.

At its meeting held January 26, 2022, Council stated its unanimous support for the moratorium to remain in place permanently. We have also been advised that approximately \$11.8 million has been budgeted to conduct geoscience research as part of an offshore growth strategy and respectfully request that these funds be used instead for fishery promotion and research.

Further, it is our understanding that the Federal and Provincial Ministers are now in a position to issue their notices. We encourage them to do so without delay in order for those who are dependent on a healthy Georges Bank and a continuation of the moratorium can know as quickly as is possible that their fishing, nursery, and spawning grounds on Georges Bank are protected.

Sincerely,

Warden Penny Smith

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Trudy Payne, CAO

[Trudy.Payne@municipalityofshelburne.ca](mailto:Trudy.Payne@municipalityofshelburne.ca)

[www.municipalityofshelburne.ca](http://www.municipalityofshelburne.ca)

Penny Smith, Warden

[warden@municipalityofshelburne.ca](mailto:warden@municipalityofshelburne.ca)

February 9, 2022

Kim Doane  
Executive Director, Subsurface Energy Development  
Nova Scotia Department of Natural Resources and Renewables  
Joseph Howe Building, 1690 Hollis Street  
Halifax, Nova Scotia B3J 3P7

Tim Gardiner  
Senior Director, Offshore Petroleum Management  
Natural Resources Canada  
580 Booth Street, 17th Floor  
Ottawa, Ontario K1A 0E4

**RE: Science and Socio-economic Review of the Georges Bank Prohibition Area 2010-2021 (the Report)**

Dear Ms. Doane/Mr. Gardiner:

The Canadian Association of Petroleum Producers (CAPP) appreciates the opportunity to review the report titled *Science and Socio-economic Review of the Georges Bank Prohibition Area 2010-2021* prepared by Stantec and Gardner Pinfold.

The Report is a useful summary of information and the potential issues associated with oil and gas exploration and development in this Nova Scotia offshore area. One area noted in the Review that has advanced and deserves mention is the improvements in regulatory oversight and science knowledge (partly arising from the Deepwater Horizon drilling rig Oil Spill in the U.S.). The report also recognizes the importance of fighting climate change while balancing the need to have reliable sources of oil and gas as part of the future energy mix. These are important factors that must be considered as Prohibition Areas are reviewed.

General Comments:

- The updated assessment is conducted only on fisheries (Section 5.0), not on other environmental factors. In the 2010 study, impacts from various oil and gas activities were discussed within Section 4 Review of Key Panel Decision Factors (by activity), as well as in the summary of updates and residual issues (Table 6.1). In this report, impacts from these activities on environmental factors (e.g., whales, turtles, birds, fish, corals...) are discussed in the Section 4.0 Updates in Knowledge and Environmental Management of Offshore Petroleum Activities but there are no conclusions on impact significance. Based on new, available data it would be helpful to have a section summarizing the updated assessment of potential effects on other environmental factors such as whales, turtles, and birds.
- Table 2.4 Sea Turtles and Table 2.5 Seabirds: there is no indication of whether the species listed are Species at Risk similar to what is referenced for fish and whales.
- Page 21: last paragraph on bird Species at Risk; and Table 2.6 Species at Risk: why is Leach's storm petrel not mentioned as a species at risk, it is in Table 2. Leach's storm petrel is also listed as threatened by COSEWIC (though not yet SARA listed).
- Table 2.8 and Table 2.9: it is difficult to compare the 2008 and 2016 data for fishing/forestry activity because the 2008 data includes oil and gas (forestry, fishing, mining, oil and gas) while the 2016 data does not (agriculture, forestry, fishing and hunting). It's not clear where oil and gas fits in Table 2.9.
- Table 3.1: we are not sure if this table can be updated as it is taken from a previous source, but some elements are missing:
  - Employment for Abandonment should also include "shore base staff", "engineers/consultants" and "barge/crane/drill rig crew"
  - For services, "consulting" should also be included in the Production and Abandonment
  - Services for Abandonment should be the same as services for Exploration (abandonment typically requires the intervention of a drill rig to plug and abandon the wells); "fabrication" can be kept as an addition to that list
- Page 57, Exploration Activity, second paragraph: "BP's Exploration License (EL 2434R) expired in January 2022)". Also, "Unless a drilling deposit is posted, Equinor's exploration licenses will expire in January 2022." This section should be updated to reflect that both BP and Equinor has relinquished its exploration licenses offshore Nova Scotia.
- Page 57, Exploration Activity, third paragraph: Call for Bids NS21-1 has now closed, and no bids were submitted.
- Page 75 Technological Advancements: This section describes the goal of subsea dispersant injection, but it does not clearly say if it works or not. It should be clarified that this technique was very efficient in responding to the Deepwater Horizon drilling rig oil spill. Dr.

Ken Lee is a leading Canadian scientist and researcher on the topic of dispersants, and we recommend that this report include references to published papers such as *Gulf of Mexico (field and laboratory studies on oil biodegradation rates and the interaction of chemically dispersed oil with suspended sediment in nearshore waters)*.

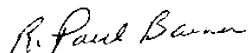
Suggested Editorial Changes :

- Section 4.0 title “Environmental” small spelling typo
- Page 27, Fundian Channel / Browns Bank AOI, the second sentence from last, “is also used by blue whales ~~as~~ for foraging”
- Table 2.7 Northeast Channel, first bullet point: aggregations of large ~~gorgonians~~ gorgonian corals”
- Minor typo for Table 2.8: “%” shown in the table for the Forestry, fishing... category. We suggest removing the % in the column
- Section 2.3.1.3 Labour Force Characteristics: page 35, end of the first paragraph “.)”
- Table 2.20: there is an “\*” after Person-Years which is not explained
- Page 54, third paragraph, the fourth sentence “would ~~likely~~ also likely”
- Page 56, Cohasset-Panuke project, “CALM” buoy should be capitalized, it’s an acronym (Catenary Anchor Leg Mooring buoy)
- Page 67, second paragraph under Regulatory Oversight, second sentence “In contract” should be in contrast.

Considering that a new Marine Protected Area is being developed for the Brown’s Bank Fundian Channel area, we encourage the NS Department of Natural Resources and Renewables and Natural Resources Canada to work with Fisheries and Oceans Canada to provide CAPP with an update on Marine Spatial Planning initiatives planned or underway for offshore east coast Canada alongside potential areas for future calls for bids in the offshore.

We appreciate the opportunity to provide comments on the Science and Socio-economic Review of the Georges Bank Prohibition Area 2010-2021.

Regards,



R. Paul Barnes  
Director, Atlantic Canada and Arctic



**Fisheries and Aquaculture  
Minister**

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PO Box 2223, Halifax, Nova Scotia, Canada B3J 3C4 • Telephone 902-424-8953 Fax 902-428-3145 • novascotia.ca

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February 23, 2022

Honourable Tory Rushton  
Department of Natural Resources and Renewables  
3rd Floor, Founders Square  
1701 Hollis Street  
P.O. Box 698  
Halifax, NS B3J 2T9

Dear Minister Rushton:

I am taking this opportunity to write to you and offer my perspective regarding the Georges Bank Prohibition Area Review.

My staff has reviewed the consultants' report prepared by the Offshore Energy Research Association (OERA); undertaken as required by the *Accords Act*. As you are aware, this report was commissioned to support a decision on the future status of the Georges Bank Prohibition Area Review. The tremendous ecological, social, and economic value of this area, as identified in the report, was evident to staff and recently relayed to me.

Georges Bank represents an area of unique bathymetry, depth, and ecological characteristics, resulting in one of the most productive fishing areas in the world which contributes more than \$145 million annually in direct landed value and this value is consistently increasing over time.

We are fortunate in Nova Scotia to have one of the strongest offshore regulatory systems in the world which has established processes for considering and balancing the various interests before allowing any petroleum activity. That said, Georges Bank is a key asset to our province from a seafood perspective, and offshore activities have associated risks.

From the perspective of the seafood industry, I would like to voice my support for extending the current moratorium for another 10 years. I would like to add that an extension of the moratorium is a position shared by the Nova Scotia harvesting sector, the aquaculture industry, and the seafood processing sector.

I look forward to hearing from you on this matter and I am always open to more dialogue or support which I may be able to provide going forward.

Yours sincerely,

Honourable Steve Craig, E.C.N.S.



# MUNICIPALITY OF DIGBY

P.O. BOX 429

DIGBY

NOVA SCOTIA

B0V 1A0

March 1, 2022

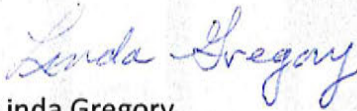
Department of Natural Resources and Renewables

To whom it may concern,

The Municipality of Digby would like to express our on-going and unwavering support for the continuation of the moratorium on oil and gas exploration on Georges Bank.

The fishing industry, including lobster, scallops, and ground fish is the biggest economic driver, not only in our municipality but in the Province of Nova Scotia. The value of Nova Scotia's seafood exports is over \$ 2 billion annually. Municipalities in Southern Nova Scotia and across the province would be devastated by any negative impact on the fishing industry.

Sincerely,



Linda Gregory

Warden

Municipality of Digby