

Seafood Producers Association of Nova Scotia

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Nova Scotia Department of Energy
Energy Strategy/Climate Change Action Plan
400 – 5151 George Street
P.O. Box 2664
Halifax, NS B3J 3P7

Dear Sirs/Madams:

Re: Comments on Energy Strategy Consultation Paper

We thank you for the opportunity to comment on the Consultation Paper for Nova Scotia's Renewed Energy Strategy and Climate Change Action Plan. SPANS represents seafood harvesters and processors primarily in the offshore fishery. We are greatly concerned that the drive to develop oil and gas projects will ignore or over-run the interests of the fishery in waters around Nova Scotia. The fishery generates employment and revenue for the province through responsible utilization of a renewable resource. The renewed Energy Strategy needs to make the same commitment for "Improving our Environment" made in the 2001 Strategy.

We recognize the oil and gas industry in Nova Scotia is at a cross-road. The revenues the Sable project has and Deep Panuke will bring to the provincial treasury are important for all Nova Scotians. Of course the province seeks to grow this revenue stream. These revenues must not, however, be derived at the expense of the marine environment upon which the fishery depends and at the expense of the thousands of people who rely of the fishery for employment and income. The scant mention of protecting the marine environment, juxtaposed with the importance given oil and gas royalty revenue (throughout the Consultation paper as well as Appendix A) sends a slanted message. It cannot be assumed that oil and gas development will occur without impact on the marine environment and without impact on the people who depend upon the oceans for their livelihood. The new Energy Strategy must fully commit to maintaining vigilance in protecting the environment.

The only two places we can find where the government recognizes the importance of protecting the environment while developing oil and gas activities are included on page 17:

- “• The renewed Energy Strategy needs to be consistent with the objectives of building on business and technology and building a healthy, safe and clean environment. ...
- Monitor new technologies and practices to ensure a minimum amount of waste.”

This is insufficient.

As a contrast, mention is made in the Renewable Resources section that in-stream tidal energy must be developed in an environmentally responsible manner. We agree that tidal energy must not be developed without full understanding of the implications on the fishery, both in the local vicinity and throughout the region's marine ecosystem.

The same commitment is not well articulated in the Natural Gas section. It is as if the passage of time from the 2001 Energy Strategy and the new challenges faced by developing offshore oil and gas resources have combined to push the environmental and protection for the fishery out of the way in the rush for royalty revenues. This needs to be corrected and commitments in the 2001 Strategy need to be re-introduced.

An opportunity to include a commitment to protect the fishery and the marine environmental is lost in the sections on Government Action and Government Intervention. Government has the largest role in requiring energy proponents to conduct themselves in a manner that does not harm the fishery or the marine environment. On page 20 in "Planning for government action" and on page 22 in "Options for government intervention" mention must be made of government's commitment to protecting the marine environment and the fishery.

Ironically, the Government Action section lauds the province's efforts in consultation and inclusiveness among stakeholders in the fishery and other marine interests that arose for the 2001 Strategy. The same message seems to be lost in 2007. Only through constant vigilance can the best balance be achieved between development of the province's non-renewable and renewable energy resources and the biologically renewable resources upon which the fishery depends.

Thank you in advance for incorporating our comments into the final version of the Nova Scotia Energy Strategy.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Lugar", written in a cursive style.

Jay Lugar

cc: Mr. Bruce Cameron, NS Department of Energy