

Petroleum-related Call for Bids NS25-1P

What We Heard Report



CNSOER
CANADA - NOVA SCOTIA OFFSHORE ENERGY REGULATOR

Petroleum-related Call for Bids NS25-1 P

The Canada-Nova Scotia Offshore Energy Regulator (CNSOER) issued petroleum-related Call for Bids NS25-1P, which includes 13 nominated parcels, on July 7, 2025.

The CNSOER administers the Call for Bids process on behalf of the federal and provincial governments for the Canada-Nova Scotia offshore area. This includes reviewing nominations, selecting Call for Bids parcels, receiving and reviewing bids, and awarding Exploration Licences (ELs). The issuance of a petroleum-related Call for Bids and the award of ELs are both subject to a federal and provincial Ministerial review and approval process as set out in legislation.

The annual petroleum-related Call for Bids process gives petroleum companies the opportunity to bid on parcels of Crown reserve land, and, if successful, be awarded an EL. EL holders may apply to the CNSOER to explore for oil and gas, but no activity can take place without authorization.

Public Written Comments

As the lead and lifecycle regulator of the Canada-Nova Scotia offshore area, the CNSOER recognizes that in carrying out our regulatory processes, it is important to engage with Indigenous groups and rights holders, the fishing sector, the public, industry and other stakeholders.

An opportunity to submit written comments specific to the areas included in petroleum-related Call for Bids NS25-1P was provided from July 7, 2025, to September 5, 2025. This opportunity was communicated to:

- Indigenous groups and rights holders from Nova Scotia, New Brunswick, Prince Edward Island, and Newfoundland and Labrador.
- The CNSOER Fisheries Advisory Committee.
- Mayor and Wardens of municipalities throughout Nova Scotia.
- The CNSOER's email subscriber list.

The CNSOER shared multiple notices of the opportunity to provide written comments on our website, and on our social media channels, LinkedIn and X.

Summary of Comments Submitted

This report provides a high-level summary of comments received. It captures the perspectives of Indigenous groups and rights holder, fisheries representatives, municipalities, environmental organizations, industry, other stakeholders, and the public.

Total submissions – There was a total of **24 unique submissions** received. Of these:

Location of submitters – **24** submissions were from Canada

Submitter type –

- **10** submissions were from organizations
- **14** submissions were from individuals

How they heard about the comment opportunity –

- **3** through CNSOER email
- **3** through CNSOER website
- **7** through word of mouth
- **5** through a media outlet
- **2** through other (email from external organization)
- **4** through other (N/A)

The written comments submitted by Indigenous groups and rights holder, fisheries representatives, municipalities, environmental organizations, industry, other stakeholders, and the public on petroleum-related Call for Bids NS25-1P, are included within this report.

What We Heard

Several themes emerged from the submissions:

Calling for an end to oil and gas in the Canada-Nova Scotia offshore area due to climate change and environmental concerns.

Some of the comments submitted expressed that offshore oil and gas activity puts our climate at risk due to the impacts carbon emissions have on our environment, marine ecosystems, and sensitive marine habitats, with further suggestions that more focus should be on protecting the environment. Other comments link extreme weather events to the extraction of fossil fuels. Some comments indicated that oil and gas development is inconsistent with international efforts to limit the impacts of climate change. Several submissions directly stated they do not support exploration for offshore oil and gas.

Oil and gas exploration and extraction is outdated, not in line with national climate policies, and not worth the climate risk.

Some comments indicated that the extraction of fossil fuels is outdated and a dying industry, and not accepted by climate science, citing the climate emergency and chaos across the nation. A few comments indicated that oil and gas exploration was not in line with regional, national, and global climate policies and targets.

Oil and gas cannot exist with offshore wind – a focus should be placed on transitioning to renewable energy projects.

Several comments indicated that oil and gas and renewable energy projects cannot co-exist, and that parcels included in the petroleum-related Call for Bids NS25-1P overlap with those indicated by governments

designated Wind Energy Areas – citing a concern of potential conflict. Many comments suggested more focus should be placed on renewable and clean energy projects, some specifically mentioning focus should be placed on offshore wind and the province's offshore wind goals.

Consultation with stakeholders.

Several commentors were concerned with the length of time for the petroleum-related Call for Bids commenting period and the lack of transparency between information publicly available between the provincial government and the public.

Oil and gas development poses a risk to fishing access in parcel locations.

Some comments indicated that petroleum-related activity in certain parcel locations will directly impact their ability to access and harvest fish species.

The development of offshore oil and gas is done safely and responsibly.

Some of the comments expressed that for many years, the exploration and development of oil and gas has been done safely and responsibly with importance given to parcel locations near marine protected areas and will continue to do so. Several comments mentioned the technological advancements of drilling and well control in the Canada-Nova Scotia offshore area.

Oil and gas development positively contributes to the economy.

Several also indicated that oil and gas development would bring economic opportunities to Nova Scotia including paying off the provincial debt, diversifying revenue streams, and employment opportunities it brings. One comment mentioned that oil and gas development can co-exist with all ocean users.

Summary

The CNSOER would like to thank everyone who submitted comments to help us better understand perspectives and concerns as this assists us in making informed decisions.

It is important to understand that the existence and mandate of the CNSOER and whether or not oil and gas activity should be permitted in the Canada-Nova Scotia offshore area is a matter of government policy, and as such is beyond the authority of the CNSOER. The CNSOER's role is to administer and enforce the *Accord Acts* legislation and regulations, as put in place by the governments. Comments related to governments' policy will be shared Natural Resources Canada and Nova Scotia Department of Energy.

It is also important to note that should an Exploratory Licence (EL) be issued, it does not permit an operator to begin work offshore. An EL gives the licence holder the right to make application to the CNSOER to drill

on their EL. No exploration activity (e.g. seismic surveying, drilling) can take place without an authorization being granted by the CNSOER for that specific activity.

Should we issue an EL and receive an application for activity, there are many things that we require before an activity authorization is granted:

- Appropriate applications and documentation – An operator must demonstrate to the CNSOER that any proposed activity would be conducted in a safe and environmentally responsible manner. Our staff conduct a thorough review of the information submitted as part of activity authorization applications for compliance with legislation and regulations.
- Special Areas – No petroleum exploration activities can occur on or within one nautical mile (or 1.85 kilometers) of the Sable Island National Park Reserve. We have also not allowed petroleum activities in the Gully area since 1998, when the Gully was first identified as a special area.
- Strategic Environmental Assessments (SEAs) were prepared by the CNSOER and include an overview of the environmental information in a study area surrounding the parcel areas. It is recommended that the information within SEAs be used by operators to assist in the preparation of project-specific environmental assessments. "The Strategic Environmental Assessment of the Middle and Eastern Scotian Slope and Sable Island Bank Areas" is particularly relevant to the petroleum-related Call for Bids NS25-1P parcels and is available [here](#).
- Project-specific Environmental Assessments – A project-specific Environmental Assessment (EA) or Impact Assessment (IA) – depending on the nature of the activity – must be undertaken as part of any application submitted by an operator to conduct activity in the Canada-Nova Scotia offshore area, with specific consideration for proposed activity within special areas. A project-specific EA or IA further evaluates potential adverse environmental effects associated with a proposed project, identifies specific mitigation measures that would need to be implemented to mitigate adverse environmental effects, and predicts whether there will be significant adverse environmental effects after mitigation measures are implemented.

Next Steps

The Board of the CNSOER will review the comments received prior to considering the issuance of an EL(s) in the Canada-Nova Scotia offshore area. All comments received have been posted on the [CNSOER's website](#), unless otherwise specified, for the public to view as well as for potential bidders to review prior to bidding on a parcel.

Petroleum-related Call for Bids NS25-1P is still open. Bids completed in the proper format must be received by the CNSOER before April 28, 2026, before 4:00 p.m. ADT. Successful bidder(s) may be awarded an EL(s), subject to the federal and provincial Ministerial review and approval process set out in legislation. If EL(s) are issued for these parcels, the effective date will be August 6, 2026.

To stay informed about petroleum-related Call for Bids NS25-1P, visit the [CNSOER website](#).



Unless marked as confidential or the submitter has requested that their comment not be shared publicly, the following are the comments received for petroleum-related Call for Bids NS25-1P. These comments have been included verbatim with no edits except for the removal of any profanities and inappropriate language.

Name	Organization	Written Comment
Rob Simpson	Public	This is a bad idea. Nova Scotians will not benefit in any way proportionally to the risks involved. Far better to invest in a massive off shore wind farm to generate electricity in sufficient quantities to meet provincial requirements and have a surplus for export. Has anyone in government been educated in the impact of carbon emissions on our environment. Please leave the gas in the ground.
David Lawrence	Public	Responsible development of offshore oil and gas has been demonstrated in Nova Scotia in the past. The technology of drilling and well control have advanced significantly since our last foray into offshore exploration & production. With our Provincial debt at \$19.5 billion offshore oil and gas production could contribute significant royalties towards paying off the debt.
Jill Steck	Public	The environment doesn't need any more fossil fuel companies like Exxon Mobile providing energy. The only thing these companies care about is making money. Who is protecting the environment? History will continue to repeat again and again. Fossil fuels pollute, period! Then the taxpayers are left with a mess to clean up afterwards. The corporate lawyers make money defending the dirtiest companies on the planet. We the people, are left with the resulting pollution for generations to come. Why don't we encourage and support sustainable technology??? It's out there. Politicians just seem to take the dirty money and puppet vote. Come on people. No more. Stop using the excuse of energy independence. Climate change is real. Vote no to any offshore drilling. Natural Gas is NOT clean energy.

Name	Organization	Written Comment
		We need to protect the environment more than ever. Speak up
Stephen Sayle	Industry Organization – SayleGroup Inc.	Thank you for the opportunity to comment. Having worked in offshore energy for decades locally in Nova Scotia, and around the world, I can say with certainty that offshore petroleum development can safely and sustainably co-exist with other stakeholders in the marine environment such as fishing, renewables, shipping, etc. I recommend looking to other jurisdictions which have successfully done so, such as Norway the UK and others, for key lessons learned in stakeholder engagement and offshore co-development for the benefit of all. As a province we simply cannot remain dependent upon equalization payments from across Canada, and offshore multi-sector development offers an opportunity for both economic benefits and a safe transition toward renewable energy.
Stephen Graves	Public	I'm a retired Canadian citizen living in Nova Scotia and I fully support exploration and development of the offshore and onshore natural gas reserves in this province. For far too long this province has relied on transfer payments from Alberta and Ontario, now we finally have an opportunity to perhaps stand on our own two feet. Special interest groups in this province have said "no" to potential development of our resources for far too long, let's not miss this opportunity and forge ahead.
John Elewa	Public	As an Engineer I have previously worked for the defunct Sable Gas project and also with ExxonMobil Canada up to the project's decommissioning and closeout. I think a lot of people are looking out for opportunities like to come, including myself. It will also help create employment for a lot of people, also help bring back experienced Nova Scotia natives working outside the province back, and also help with revenue generation for the province by making gas a staple energy source for every home in the province. Gas is much cleaner than coal and other energy sources out there today and will definitely be a game changer for us here. I am very excited about these emerging opportunities as an experience professional, to be able to add value and as expert in the industry. I will be looking out for any opportunities in the new establishment if approved.
Matthias Winkler	Public	I just want to voice my big support for Offshore Natural Gas Projects (and other energy projects) here in Nova Scotia. Nova Scotia needs to become economically more independent and less reliant on the federal government for our services (ex.

Name	Organization	Written Comment
		healthcare, infrastructure, etc). Also Nova Scotia and the Maritimes needs energy security and become less reliant to the United States and Western Canada. I believe Nova Scotia is located at a convenient location geographically with close proximity to Europe and United States. Europe and USA would be great locations of Natural Gas Exports. My suggestion to the Nova Scotia government is to also collaborate with our neighboring province of New Brunswick which has an LNG Terminal and could be beneficial for Natural Gas Exploration in Nova Scotia. I just want to encourage Tim Houston and the Nova Scotia Government to do everything in their power to attract the big investments to this province including Offshore Natural Gas because the young people (like myself) deserve a bright and prosperous future in this beautiful province. I don't want to leave this province or country for better opportunities; lets create these opportunities here at home.
Peter Ritchie	Public	Further fossil fuel extraction flies in the face of accepted climate science. Simply put, it would be moronic to entertain the idea of renewed extraction of offshore petroleum. [REDACTED]
Donna Burton	Public	Please publish all public consultation between NS Government and the NS People for petroleum-related Call for Bids NS25-1P. In NS we feel like we're living in a dictatorship and this is one more example. Come on. Let's do better.
Timothy Tanner	Non-profit Organization – Council of Canadians	We would like to our concerns on this Offshore Gas Exploration Project once again threatening Nova Scotia's Atlantic Marine Ecosystem's and Fisheries. Our fight won't stop to reinforce a Moratorium on all Fossil Fuel Exploration and Mining on Nova Scotia's Continental Shelf .This Obsolete Climate Change Energy Source Project is being proposed while Nova Scotia is preparing Clean Energy Floating Wind Turbine Developments. Developing Clean Energy Wind,Solar,and Ocean Turbines will Guarantee a Renewable Energy Future for Nova Scotian's while Protecting Nova Scotia's Marine Environment .Nova Scotian's won't tolerate these Fossil Fuel Greenwashing Corporate Projects.
Catherine Boyd	Indigenous Commercial Fishing Organization – Clearwater Seafoods	Click to access Clearwater Seafoods Limited Partnership letter.

Name	Organization	Written Comment
	Limited Partnership	
Mark Tipperman	Public	Nova Scotia's provincial government and our federal government need to become educated about the disastrous impacts of their bent to exploit all natural resources regardless of the short term, intermediate and long-term consequences. Fossil fuels need to be abandoned; not extracted. We need to leave all of the carbon and methane in the ground and in the trees and ocean if we want humanity and higher forms of life to survive. We need to see science based decisions and use of common sense by our governments' decision makers. Growth, development and "good for the economy" are not legitimate reasons to do anything as destructive as more oil and gas.
Colleen Freake	Organization – Tidal Wild Farm	Dear respected regulatory officials, Offshore extraction of fossil fuels is outdated, out of touch and not worth the risk. We are in a climate emergency. The last thing that any Canadian needs is the increased probability of another environmental disaster in a year that has seen extreme weather across the country. Do we need an increase likelihood of an oil spill, gas flares, or expansion of a resource extraction industry the puts the future of our planet and human lives in peril? Canada cannot afford to increase climate chaos with more offshore petroleum exploration. We have seen high temperature records broken across Canada this summer. We are still battling wildfires and evacuations, homes and livelihood destroyed by the extreme conditions derived from the consequences of burning fossil fuels around the world. The location of these extractions does not matter as much as the resource's intended use: These materials cause climate change. We need to limit their production and rapidly scale up their replacements. That is the set of records Canada needs to break: More renewable energy than ever before. More biodegradable materials in production to replace petroleum-derived plastic. We need record-breaking planning and foresight that respects seven generations beyond us. We need to honour ancestors that have helped us learn these lessons. We need to actively engage in solutions with all members of society. I have been struggling to earn even a basic repayment of my investments as a farmer. I have no doubt that other industries face economic pressures as we farmers do, but I truly believe that it is decisions like this, regarding expansion of oil and gas extraction, that critically endanger all farmers/farmworkers ability to survive. We continue working in the smoke and health-endangering heat. We continue debt-dependent businesses

Name	Organization	Written Comment
		year after year. We are on the front lines of climate change, and the worst part is that our decision makers continue to put our communities at risk by making decisions, like the Call for Bids, that endanger the world's food supply. Now is the time for bold investment and creating solutions that work for everyone. This industry is dying. This call for bids is poorly timed with the looming climate targets and with the rapidly expanding climate refugees fleeing uninhabitable places across the planet. The most important thing for Canada and Nova Scotia to do with our resources is to conserve, protect, and create, not to extract, profit, and endanger.
Britt Roscoe	Public	Petroleum development is a bad idea. I've been wearing a mask to sleep because of an out of control wildfire across the Annapolis Valley. Also, I live in fear that sparks will ignite my tinder dry forest. Oil and gas emissions have created climate change, resulting in these wildfires and droughts. It's also hurricane season and increased temperatures have increased wind speeds. Any off shore energy development should be from wind. It's cheaper than Petroleum and quicker to develop. Please, no more oil and gas development, especially LNG, a greenhouse gas many times more potent than CO2.
Stewart Lamont	Commercial Fishing Organization – Tangier Lobster Company Ltd.	I am impacted by climate change through our business primarily and also personally. We are live lobster exporters to the international marketplace and we see coastal impacts in the last five years such as we have never seen before. More storms on an annual basis of much greater severity than ever in the past. We see warming water conditions - on average a 4% higher temperate in our region than previously. We see changes in the lobster catch and the lobster quality All of these are directly attributable to climate change and very troubling. Offshore oil and gas exploration is simply not rational policy given all that is taking place.

Name	Organization	Written Comment
Sabrina Gannon	Public	I am a Nova Scotian writing to express my opposition to petroleum-related Call for Bids NS25-1P. The parcels being provided in this call for bids are very close to a protected marine area. Furthermore, I do not support furthering petroleum exploration; fossil fuels are a dying industry and to invest in exploration at this time is a waste of resources and time. Instead, more focus should be spent on innovating emerging renewable energy sources, with prioritization of Canadian companies so that Canadians can benefit as much as possible from our own resources. We are already experiencing the impacts of climate change here in Nova Scotia, as our 2025 fire season and long drought has shown. This call for bids is an unconscionable investment in continuing our suffering and does nothing to improve our lives, it is only an opportunity for corporations to profit.
Jennifer Matthews	Industry Organization – Canadian Association of Petroleum Producers (CAPP)	Click to access the Canadian Association of Petroleum Producers letter.
Kostantina Northrup	Environmental Law Organization – East Coast Environmental Law (ECEL)	Click to access East Coast Environmental Law letter.
Simon Ryder-Burbidge	Environment Charity Organization – Ecology Action Centre (EAC)	Click to access Ecology Action Centre letter.
Christopher Jones	Commercial Fishing Organization – WT Gover Fisheries Ltd. & Ocean Pride Fisheries Ltd.	Have serious concerns about the short period of notification and deadline for comments of this proposal which provides little to no time to provide adequate input. The deadline for commentary and expression for concerns should be at least similar in length to that provided for expression of petroleum related bids.

Name	Organization	Written Comment
		Our companies have designated Federal Fisheries and Oceans fishing sea cucumber zones (leases) on the Eastern Scotian Shelf on Middle and Sable Island Banks and have serious reservations concerning the CNSOEB arbitrarily authorizing petroleum related leases in proximity to our Federally issued zones/leases without any prior direct consultations or advisements. The existing gas pipeline structure (now abandoned) runs through our Federally issued zones with an arbitrarily imposed buffer area of 2.5 kms on both sides of the pipeline displacing fishing access within our designed fixed zones/leases thereby causing enormous loss of sea cucumber fishing access with significant accompanying loss of income. All future petroleum related bids and subsequent pipelines need to be subject to a rigorous consultative process and agreements from effected fisheries prior to releasing a call for bid. This rigorous process needs to commence immediately as a prerequisite for this particular call for petroleum bids on the Scotian Shelf.
Tony Reddin	Public	I thank you for this opportunity to express my fearfulness for the future of our society unless governments and institutions act with urgency to transition us away from wastefulness and dependence on fossil fuels. In every policy and regulation discussion, Climate Action must come before everything else; otherwise climate change disasters will continue to take and destroy all our human and natural resources. The highest priorities for you regulators should be to lessen and prevent, as much as possible, the destruction that is likely to be caused by future climate change disasters like the ones we are witnessing these recent years. The forests we need to protect us from heat and water depletion and flooding are being destroyed by wildfires! The hydro power we need for a green energy transition is being lessened by climate change droughts and glacial melting! In addition to contributing to climate change, offshore exploration and development for petroleum is an unacceptable threat to our seas and shores. Marine life and human livelihoods can be destroyed by oil spills and harmful impacts from seismic testing. And of course all the Atlantic provinces and beyond would be affected. Wind turbines and possibly ocean current and tidal turbines are the only offshore energy developments that should be allowed in the Canada-Nova Scotia offshore area.

Name	Organization	Written Comment
		Our Canadian government and regulators must stop back-sliding on effective action to lessen the carbon emissions that are causing the global climate change catastrophe. That means no more public investment in, or support for, the fossil fuel industries. Those greedy corporations are of course following their financial mandate to maximize profits, while disregarding their intentional contribution to accelerated climate change and the death and destruction that we see from extreme storms, wildfires and floods in Canadian communities.



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Canada Nova Scotia Offshore Energy Regulator
27-201 Brownlow Avenue
Dartmouth Nova Scotia, Canada
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Via online submission portal

August 28, 2025

To Whom it May Concern,

Please accept this submission to the current public consultation period for petroleum-related Call for Bids NS25-1P. As a representative of Clearwater Seafoods, a responsible operator in several fisheries in Atlantic Canada, I appreciate the opportunity to comment.

Through the purchase of Clearwater Seafoods in January 2021, the Mi'kmaq Coalition, made up of seven communities in Atlantic Canada have a direct stake in the continued sustainability of our oceans as well as access to important fishing areas. The communities, Membertou, Miawpukek, Sipekne'katik, We'koqma'q, Potlotek, Pictou Landing, and Paqtnekek, through FNC Quota Limited Partnership, hold the offshore fishing licences for scallop, lobster, groundfish, clams, and northern shrimp.

I will take this opportunity to speak directly on the Call for Bids parcels that have the greatest opportunity to negatively impact Clearwater's harvesting operations on Sable Island Bank, where Clearwater harvests a significant ocean quahog resource (see Figure 1).

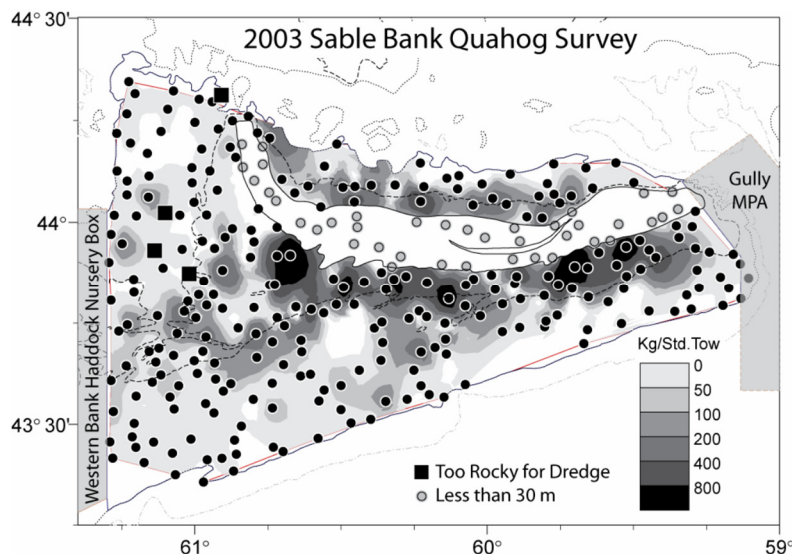


Figure 1. Contour map of the catch per standard (Std.) tow for the 2003 Sable Island Bank ocean quahog survey. Source, Roddick, Kilada & Mombourquette (2007) available at https://www.dfo-mpo.gc.ca/csas-sccs/publications/resdocs-docrech/2007/2007_036-eng.htm



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Ocean quahogs are long-lived species, with the oldest aged specimen from the Scotian Shelf reaching 211 years old, while the oldest aged anywhere was 225 years old from the eastern US. While there have not been recent scientific surveys, it is reasonable to assume that the biomass on the bank is similar to that which was identified in the 2003 survey, which is the basis for the current total allowable catch of 11,587 tonnes.

Readily available commercial fisheries data from Fisheries and Oceans Canada does not include fishing data for this area beyond 2021. This data limitation omits the fishing undertaken by Clearwater vessels in more recent years, which has been steadily increasing as we become more familiar with the resource and the successful fishing grounds and build the market for this product.

Exclusion from these areas because of offshore energy development will result in direct and irrecoverable loss of fishing access. Ocean quahogs, like other clams, bury in sandy bottom after maturing out of their larval stage and are then immobile. They do not relocate to other areas and the biomass in that region cannot be made up by harvesting elsewhere.

While the 7 Mi'kmaq Coalition Communities referenced above have an invested interest in Clearwater's overall success, Mi'kmaq communities more generally across Atlantic Canada are specifically reliant on the economic benefits from the offshore clam fishery. In 2019 Clearwater and all 13 Mi'kmaq communities in Nova Scotia and 1 in Newfoundland and Labrador announced a Landmark Agreement specifically on the benefits from the offshore clam fishery.

<https://www.clearwater.ca/news/landmark-reconciliation-agreement-reached-in-the-arctic-surf-clam-fishery/>

Through this initiative, the 14 Mi'kmaq communities formed *E'sukutimkewey*, a special purpose corporation and partnered with Clearwater in a 50-year agreement that provides millions of dollars in benefits to First Nations through annual revenue sharing, training, leadership development, employment, as well as procurement of good and services from Indigenous suppliers. These benefits are linked directly to success in the offshore clam business.

Infringement on the economic opportunity provided by clam fishing on Sable Island Bank directly impacts the economic benefits flowing to *E'sukutimkewey* and the constituent communities.

As the CNSOER considers Bids for petroleum development on Sable Island Bank, it is imperative that the economic and environmental implications of such development on pre-established fisheries is carefully considered.

Kind Regards,

A handwritten signature in blue ink, appearing to read "Catherine Boyd".

Catherine Boyd
Director, Sustainability and Public Affairs



September 4, 2025

Christine Bonnell- Eisnor
Chief Executive Officer
Registrar
Canada Nova Scotia Offshore Energy Regulator
27-201 Brownlow Avenue
Dartmouth, NS B3B 1W2
CBonnell@cnsoer.ca

Re: Canada Nova Scotia Offshore Energy Regulator Petroleum-Related Call for Bids NS25-1P

Dear Ms. Bonnell-Eisnor:

The Canadian Association of Petroleum Producers (CAPP) is pleased to have this opportunity to provide comments on the Canada Nova Scotia Offshore Energy Regulator (CNSOER) petroleum-related Call for Bids NS25-1P issued on July 7, 2025.

CAPP supports the decision by the CNSOER and governments to move forward with the Call for Bids NS25-1P. CAPP members have been operating in Atlantic Canada's offshore for over fifty years and are committed to the safe and responsible exploration, development, and production of Canada's petroleum resources. The comments provided in this letter are based on sound operating practices and collective experience gained from working in Canada and around the world.

The petroleum-related nominated parcels in this Call for Bids are located in offshore areas where natural gas and oil production have historically occurred. The parcels located on the Scotian Shelf are near the Sable Island National Park Reserve and west of the Gully Marine Protected Area, which do not permit petroleum-related activity within one nautical mile of the Sable Island National Park Reserve. CAPP remains an active participant in the Gully MPA Advisory Committee and worked with operators in the area during the MPA's establishment to develop additional mitigations beyond legislated requirements, such as maximum vessel speed limits. This information can be shared with successful bidders should the CNSOER award offshore licenses.

The Strategic Environmental Assessment (SEA) of the Middle and Eastern Scotian Slope and Sable Island Bank Areas was completed for the region, outlining environmental and sustainability considerations to ensure they are effectively mitigated. There has also been a significant body of research conducted over the last ten years on seabirds, Indigenous Knowledge, Atlantic salmon migration, fish, and marine noise, funded via the Environmental Studies Research Fund, from which

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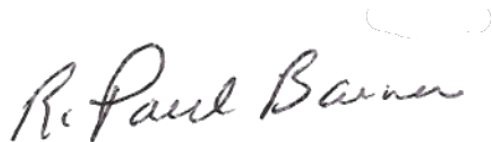
the CNSOER, proponents, and stakeholders can draw. Any specific conditions that are imposed on exploration license holders should factor in this information and not duplicate work that has already been done.

The lack of a Regional Assessment puts the province of Nova Scotia at a disadvantage in terms of attracting offshore oil and gas investment, as the processes and approval timelines may not be competitive with those of other offshore jurisdictions. I have copied representatives from Nova Scotia Department of Energy, Natural Resources Canada, and the Impact Assessment Agency of Canada on this submission to encourage all parties to work together to establish a Regional Assessment process for exploration drilling offshore Nova Scotia.

Finally, should the CNSOER ultimately grant authorization to an operator to proceed with offshore activity as part of this Call for Bids, the province and the federal government must recognize and support the offshore energy regulator's decision. The previous decision by the federal and provincial governments in December 2023 to jointly veto an exploration licence for a parcel of land in the same area was precedent-setting. It could have long-term implications for the future development of Nova Scotia's offshore oil and gas resources. It is essential that, should there be successful bidders in this Call for Bids, governments demonstrate that they are supportive and open for business.

Once again, CAPP is pleased to see the CNSOER move forward with this Call for Bids and looks forward to seeing the results in 2026. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink, reading "R. Paul Barnes". The signature is written in a cursive, flowing style. Above the signature, there is a faint, light-colored circular stamp or mark.

R. Paul Barnes

Director, Atlantic and Northern Canada

cc:

Kim Doane, Energy Resource Development, NS Department of Energy

Jean-Philippe Prost, Natural Resources Canada

Mike Atkinson, Impact Assessment Agency of Canada

Canada–Nova Scotia Offshore Energy Regulator
27–201 Brownlow Ave.
Dartmouth, NS B3B 1W2

SUBMITTED ONLINE

September 5, 2025

Dear Canada–Nova Scotia Offshore Energy Regulator,

Re: Petroleum-related Call for Bids NS25-1P

East Coast Environmental Law appreciates this opportunity to comment on the petroleum-related Call for Bids NS25-1P that was issued on July 7, 2025.

East Coast Environmental Law is a regional charity that advocates for progressive environmental law and policy, provides public legal education, and supports others working to advance environmental and climate justice. Our understanding of environmental and climate justice is shaped in part by our understanding of the climate crisis and its current and future consequences. In recent years, Nova Scotians have begun experiencing the devastating effects of droughts, wildfires, storm surges, and flash floods that are being intensified by climate change. It is already too late to reverse these consequences, but, by lowering greenhouse gas emissions now, we can help to prevent fires, floods, and famine from becoming increasingly extreme in the decades to come.

We support efforts to advance the necessary transition from fossil fuel energy sources to sources of clean and renewable energy. We have engaged constructively in the work being done to establish legal regimes for offshore renewable energy development in Atlantic Canada, and we support the Government of Canada's and Government of Nova Scotia's efforts to advance decarbonization through offshore wind.

We do not support new exploration for offshore oil or gas. It is simply not possible for the international community to keep global temperature rise well below 2°C above pre-industrial levels, and as close as possible to an upper limit of 1.5°C, if we continue to develop petroleum resources with no regard for the global carbon budget. Contrary to some popular messaging of the day, we cannot actually have it all: the world has reached the brink of irreversible climate disaster, and we must acknowledge that we cannot preserve a liveable future without leaving large oil and gas reserves in the ground. The recent advisory opinion of the International Court of Justice on the Obligations of States in Respect of Climate Change makes it clear that Canada, like other members of the international community, has legal obligations to act with due diligence to mitigate climate change and prevent climate harms.¹ Prioritizing fossil fuel production above legal obligations to reduce greenhouse gas emissions may lead to legal as well as moral culpability.

¹ International Court of Justice, *Advisory Opinion: Obligations of States in Respect of Climate Change* (23 July 2025).

Canada and Nova Scotia are laying the foundations for a transformative and sustainable offshore wind industry, and it would be a shame to see those efforts undermined by refusal to let go of outdated offshore oil and gas ambitions. We note that some of the parcels in Call for Bids NS25-1P appear to overlap with the Sable Island Bank Wind Energy Area. This introduces potential conflicts in a Wind Energy Area that could support the achievement of Nova Scotia's offshore wind goals.

In December 2023, Canada's Minister of Energy and Natural Resources and Nova Scotia's Minister of Natural Resources and Renewables chose to set aside a Canada–Nova Scotia Offshore Petroleum Board decision to issue a petroleum exploration licence on Sable Bank. In their reasons, the Ministers cited “broader policy considerations”, including the Government of Canada's and Government of Nova Scotia's “shared commitments to advance clean energy and pursue economic opportunities in the clean energy sector”.² The joint statement by the two Ministers also emphasized that their decision would enable the Government of Canada and Government of Nova Scotia “to research and understand the interactions between the two industries” (meaning offshore renewable energy and offshore petroleum) “as we transition to our clean energy future”.³ This reasoning is as relevant today as it was two years ago. The Regional Assessment of Offshore Wind Development in Nova Scotia did not conclude that offshore wind activities can co-exist with offshore oil and gas exploration and development in the ocean around Nova Scotia or address the question in detail, and we are not aware of any studies by the Government of Canada or Government of Nova Scotia that would inform a new understanding of interactions between offshore wind and offshore oil and gas activities.

We also note that some of the parcels in Call for Bids NS25-1P appear to be adjacent to The Gully Marine Protected Area and to overlap portions of the Eastern Canyons Marine Refuge and proposed Logan Canyon conservation site. Offshore oil and gas activities should not be permitted in legally protected and conserved marine areas or in marine areas that are slated for future protections.

If Call for Bids NS25-1P results in any bids being submitted by the closing date on April 28, 2026, we urge you to decide that no interest should be awarded in any parcel. It is time for the Government of Canada and Government of Nova Scotia to commit to a clean energy future and abandon offshore oil and gas development. Whatever profit might be realized from new offshore petroleum activities in Nova Scotia, it would be trifling in comparison to the social costs of climate disaster—costs that Nova Scotians are already experiencing today and that will only increase if we fail to make changes now.

Sincerely,



Kostantina Northrup
Staff Lawyer

² Nova Scotia Department of Natural Resources and Renewables, [“Joint Statement on Exploration Licence Decision”](#) (4 December 2023).

³ *Ibid.*



Canada-Nova Scotia Offshore Energy Regulator
27-201 Brownlow Avenue Dartmouth, NS B3B 1W2

September 5, 2025

Re: Comments on Call for Oil and Gas Bids NS25-1P

We respond with dismay to the Board's call for bids for offshore oil and gas (NS25-1P). We had taken the rejection of the Inceptio licence in December of 2023 and the renaming of the Board as a shift in strategic direction for the Board and the federal and provincial governments, a shift which Ecology Action Centre considered had both environmental and economic merit.

Climate scientists are increasingly drawing a direct link between extreme weather events and the extraction and burning of fossil fuels. Hurricane Fiona in 2022, the flash floods of 2023 and the wildfires of 2023 and now 2025 in our home province of Nova Scotia can be connected with the growing levels of carbon dioxide and other heat trapping gases in the atmosphere. Restarting the exploration and exploitation of offshore oil and gas and the subsequent combustion of the extracted fuels will contribute to the growing severity of weather events causing both human and economic harm here in Nova Scotia and around the world. This submission outlines several reasons why the call for bids should be cancelled.

Risk of additional investment in fossil fuels

Pursuing new natural gas development is inconsistent with global and regional climate targets. The Intergovernmental Panel on Climate Change and the International Energy Agency have made it abundantly clear that launching new fossil fuel projects will derail efforts to limit warming to 1.5 °C. Nova Scotia has not seen offshore oil or gas production since 2018, and four consecutive bid calls have gone unanswered—reflecting both public sentiment and our shared readiness to move forward with a just transition.

Polling routinely confirms that support for transitioning away from fossil fuels among Atlantic Canadians is strong. A recent [poll](#) conducted by Abacus Data found that 63% of Atlantic Canadians favour clean energy projects such as critical minerals, renewable power and transmission, and energy storage over conventional fossil fuel projects. Given the urgency of climate science and a public mandate, further investment in natural gas threatens to lock us into decades of fossil dependence, methane-linked greenhouse emissions, and stranded infrastructure. Instead, we must

reallocate resources toward renewable energy, energy efficiency, and equitable support for communities and workers through this transition.

We are supportive of Nova Scotia's plan to develop wind energy offshore and we recommend a continued focus on the success of that initiative. We are confident that offshore wind has the potential to yield higher economic benefits for Nova Scotians. Indeed, a 2020 [report](#) published by the Centre for American Progress found that from 2019-2021, per-acre revenue from offshore wind was 125% higher on average than revenue from offshore oil and gas lease sales.

Impacts on the marine environment and proximity to sensitive marine habitats

The call for bids areas lies adjacent to The Gully Marine Protected Area while overlapping parts of the Eastern Canyons Marine Refuge and the proposed Logan Canyon conservation site, listed as a Tier 2 on the Maritimes Region conservation network. Near proximity also includes the Western/Emerald Banks Marine Refuge and another proposed Tier 2 conservation site at Sable Bank. Offshore petroleum development—including seismic surveys, exploratory drilling, and production activities—poses risks to these marine ecosystems, especially in sensitive areas like canyons and slopes within or immediately beside protected zones. Seismic surveys generate powerful underwater noise that can disturb marine mammals' communication, navigation, and feeding behaviors, particularly vulnerable species such as the northern bottlenose whale, blue whale, Sowerby's beaked whale, fin whale, sei whale, leatherback turtle, and white shark, all of which are present in the area and listed by Canada's Species at Risk Act or the Committee on the Status of Endangered Species (COSEWIC). Exploratory drilling including discharge of drill muds and the potential for oil spills threaten benthic habitats, including cold-water corals, sponges, soft-sediment communities, and deep-sea canyon ecosystems that support a high diversity of invertebrates and fish. Additionally, these industrial activities could disrupt food webs, including impacts on plankton assemblages, larval fish retention, and economically important groundfish species. Accidental spills, though low probability, carry severe consequences for marine life and fisheries livelihoods. In our view, mitigation planning offered by proponents is not sufficient to prevent ecological damage that could occur in and near these areas.

Recognition of marine refuges, 25-km buffer zones for protected areas

We are concerned that the call for bids map still does not recognize marine refuges, and that the bid area has been allowed to overlap with Eastern Canyons. Marine refuges are an important part of Canada's marine conservation landscape and should,



at minimum, be highlighted for consideration within the "Special Areas" information offered by the CNSOER online.

Better buffer zones should be established for The Gully MPA and Sable Island National Park Reserve. With no buffer, endangered marine mammals living within The Gully are certain to transit into the bid parcels where they are subject to harm should development proceed. At Sable Island, the current 1.85-km buffer offers very little protection in the case of a spill, and the effects on the island's sensitive habitat could be catastrophic if that were to happen. Nova Scotia's Sable Bank Wind Energy Area includes a 25-km buffer for Sable Island, as recommended by the Regional Assessment of Offshore Wind Development in Nova Scotia. Previous drilling projects were far too close to Sable and petroleum developers should now be held to the same standard as wind developers. A minimum 25-km buffer should be granted to both Sable Island and The Gully.

Deep water drilling

More than half of the parcels up for bid are in deep water. As repeatedly pointed out by the Offshore Alliance, Clean Ocean Action Committee and others in the past, drilling at depths of one or more kilometres poses heightened risk particularly in heavy seas. [In 2016](#), Shell Oil, drilling at a depth of two kilometres off the Nova Scotian Shelf, experienced a catastrophic accident with drill pipe falling to the ocean floor and narrowly missing the wellhead. Luckily the well was dry. If a blowout were to occur during exploration or production drilling, Nova Scotia and Canada lack the resources and equipment to respond adequately. As was noted in 2016, the nearest capping stack is in the Gulf of Mexico or Northern Europe taking weeks to bring the required equipment to the Scotian Shelf via a vessel.

Governments across Canada and around the world are offering up reasons as to why they should continue to explore for and develop their fossil fuel reserves. The result will be a hotter and more dangerous world for us and our children. Nova Scotia and Canada should drop this call for bids.

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