

Alder Institute
Merits Review Presentation
to the Hebron Public Review
December 6, 2011

Presenter: Janet Russell

Alder Institute

- a non-profit collective founded in 1998
- Mandate:
 - represent an ecological point of view in public discourse
 - translate science into common language

Prior participation in oil and gas reviews

- Terra Nova EA
- White Rose EA
- Orphan Basin SEA
- South Coast SEA
- Hebron

Selected Alder publications

8th *Effects of Oil on Wildlife Conference*, St. John's, Newfoundland, Canada, 3-5 Aug 2005

Offshore oil spills: Problems comparing observations with predictions in eastern Canada. G.S. Fraser, Faculty of Environmental Studies, York University; J. Ellis and J. Russell, Alder Institute.

Among the Conclusions:

Offshore oil and gas legislation (i.e. Atlantic Accord) limits public access to basic information

Selected Alder publications (cont.)

Fraser, G.S., Russell, J. & Von Zahren, W.M. 2006.
Produced water from offshore oil and gas installations on the grand banks, Newfoundland and Labrador: are the potential effects to seabirds sufficiently known? Marine Ornithology 34: 147-156.

Among the conclusions:

The null hypothesis that oil sheens do not kill seabirds needs to be tested.

No data ≠ No effects

- If no data relevant to the testing of a null hypothesis are being collected, it is a subversion of science to accept and apply a null hypothesis as a management tool (i.e. in this case, an EA tool). The Precautionary Principle must be applied in this context.

Science and Hebron

Hebron CSR 9.5.2.4 Potential Mortality

“It is unknown which seabird species, if any, are susceptible to mortality from flaring. There is currently no known mitigation for the potential environmental effects from flaring, but flaring is expected to have minimal effect on marine birds over the duration of the Project.”

Science and Hebron

Hebron CSR Table 9-11 Environmental Effects Assessment: Operations and Maintenance

The key to Table 9-11 includes the following definition under Magnitude:

N = Negligible: There may be some environmental effect but it is not considered to be measurable

On September 23, we requested a discussion to substantiate a methodology that equates nonmeasurability with negligible effects. We requested that the key include more information by adding under each heading a category for “unknown”. Following this addition we requested that the assessment of effects be reconsidered and a discussion of the effect of unknowns on the level of risk being taken be provided in conjunction with a consideration of what role if any the Precautionary Principle has in the environmental assessment of offshore oil and gas projects.

Lessons from Northern Cod

- Science vs Optimism
- melting together of University/State/Industry
- Universities not sufficiently independent
- Separation of Industry and Science
- Separation of Science and State
- Designing our own insurance
- Free and critical thought by design

Alder submissions regarding the Hebron Project

- August 11, 2010 Alder responded to the invitation for public comment on the draft *Comprehensive Study Report (CSR) for the Hebron Development Project*.
- September 23, 2011 Alder responded to the invitation for public submissions of requests for further information to the Hebron Public Review.
- November 14, 2011 Alder responded to the invitation from the Hebron Public Review to review the merits of the Hebron Environmental Assessment or Comprehensive Study Report.

Conclusion from Alder's November 14 Merits Review Submission

- The environmental effects assessment provided for marine birds for this project is not realistic, scientifically defensible or acceptable.

Protect the role of science

Relieve the CNLOPB of its conflict of interest as both regulator and facilitator of oil and gas

Relieve Government research at DFO and Environment Canada of dependency on industry for funding and logistics

Relieve the University from its current prostitution to the oil and gas industry