

July 31, 2018

Rémi Bujold (co-chair)  
National Advisory Panel on MPA Standards  
c/o Environment and Climate Change  
200, Sacré-Coeur Blvd  
Gatineau, Quebec K1A 0H3

Mary Simon (co-chair)  
National Advisory Panel on MPA Standards  
c/o Environment and Climate Change  
200, Sacré-Coeur Blvd  
Gatineau, Quebec K1A 0H3

Dear Panel Co-chairs:

**RE: CAPP Response - National Advisory Panel on Marine Protected Area (MPA) Standards**

The Canadian Association of Petroleum Producers (CAPP) represents companies, large and small, that explore for, develop and produce natural gas and crude oil throughout Canada. CAPP's member companies produce about 80 per cent of Canada's natural gas and crude oil. CAPP's associate members provide a wide range of services that support the upstream crude oil and natural gas industry. CAPP membership is inclusive of approximately 150 organizations. Together CAPP's members and associate members are an important part of a national industry with revenues from crude oil and natural gas production of about \$10 billion a year. CAPP's mission, on behalf of the Canadian upstream crude oil and natural gas industry, is to advocate for and enable economic competitiveness and safe, environmentally and socially responsible performance.

Over the past decade, CAPP has provided extensive written comments on the designation of marine protected areas (MPAs) in several provinces and territories and has been an active participant in the consultation process, most recently the Laurentian Channel MPA in Newfoundland and Labrador. All of our submissions are developed through engagement with our members. Accordingly, CAPP appreciates the opportunity to provide our perspective, feedback and recommendations to the National Advisory Panel on the development MPA Standards.

While noted in our presentation to the National Advisory Panel in St. John's on May 7, 2018, CAPP would like to reiterate that offshore oil and/or natural gas projects are developed in a responsible manner for the benefit of all Canadians. To achieve the desired certainty and consistency, regulation, standards and guidance must be based on a conservation approach that allows for sustainable development, integrated management and evidence-based decision making that considers advancements in science and technology. Without these elements, investment in Canada's resources will diminish.

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2100, 350 – 7 Avenue S.W.  
Calgary, Alberta  
Canada T2P 3N9  
Tel 403-267-1100  
Fax 403-261-4622

1000, 275 Slater Street  
Ottawa, Ontario  
Canada K1P 5H9  
Tel 613-288-2126  
Fax 613- 236-4280

1004, 235 Water Street  
St. John's, Newfoundland and Labrador  
Canada A1C 1B6  
Tel 709-724-4200  
Fax 709-724-4225

360B Harbour Road  
Victoria, British Columbia  
Canada V9A 3S1  
Tel 778-265-3819  
Fax 403-261-4622

Canada is competing globally for capital investment to enable the development of our oil and natural gas resources. With even more energy development options worldwide and a lower price environment, this competition is exacerbated. To better compete in this environment, many jurisdictions, most notably the United States, are responding by taking measures to reduce their regulatory cost burden. Other reputable jurisdictions such as Norway and the UK already have robust regulatory processes that are much more efficient than Canada's. If Canada is to continue to develop its resources in a responsible manner and effectively compete for capital with other jurisdictions, it must have a far more effective and efficient regulatory process and associated protection standards.

CAPP firmly believes that conservation objectives can be achieved while permitting economic activities, depending on the potential risks of these activities to the ecological features being protected. The policy and regulatory environment in which our Industry works has a significant impact on the competitiveness of the Canadian oil and natural gas industry in the global marketplace, and on the attractiveness of offshore areas for exploration and development investment, which are factors the National Advisory Panel on Marine Protected Area Standards should consider in its recommendations to the federal government.

CAPP's response focuses on answering the following five questions that are the focus of the National Advisory Panel:

1. Experience around the world indicates that well-managed marine protected areas can help safeguard ecosystems and wildlife, rebuild fish stocks, and generate increased economic opportunities. What practical recommendations do you have for creating standards for marine protected areas?
  - a. On what do you base these suggestions? Best available science, Indigenous knowledge, ecosystem approach or something else?
2. What role do Indigenous approaches play in shaping your suggestions? What kinds of guidelines will help Canada to honour its commitments to reconciliation and new relationships with Indigenous peoples?
3. The IUCN has developed an existing structure to categorize marine protected areas. What do you see as the strengths and weaknesses of the IUCN Guidelines?
4. Overall, do the Guidelines developed by the IUCN work well in the Canadian context?
5. Are there specific circumstances unique to Canada that pose challenges for the use of the IUCN Guidelines? What might these be? How should these circumstances be addressed?

CAPP, and its members, appreciate the opportunity to provide responses to the above questions and have included additional information to assist the National Advisory Panel as it develops its report to the Minister of Fisheries, Oceans and the Canadian Coast Guard on the development of protection standards for federal MPAs. We remain committed to ongoing engagement to develop policy options

that allow Canada's resource sector to remain viable and competitive while meeting our mutual desire to protect the environment and to better serve all Canadians. For questions or follow-up related to the submission please contact me at (709) 724-4200.

Sincerely,



R. Paul Barnes  
Director, Atlantic Canada and Arctic  
Canadian Association of Petroleum Producers

Encl.

- Submission – CAPP Detailed Comment

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2100, 350 – 7 Avenue  
S.W.  
Calgary, Alberta  
Canada T2P 3N9  
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