



- Protection of Arctic people and the environment from multi-year blowouts: *the NEB should maintain the intent of the same-season relief well policy by either enforcing a strict interpretation of its current policy or designing a real equivalency that will ensure a blowout can be killed within one open water season rather than extend into multiple seasons* (Recommendation 7).
- Arctic-specific standards: *the NEB should create Arctic-based standards for spill planning and response, compliance monitoring, transportation, and decommissioning and remediation* (Recommendations 6 & 11).
- Liability for oil spills: *the NEB should clarify through a policy review how Arctic oil and gas operators will be required to meet Inuit land claim agreement provisions for absolute liability for a worst-case scenario oil spill* (Recommendation 4).

Other recommendations lie outside the independent regulatory function of the NEB and will need to be considered by the federal government at the agency or cabinet level. We have separately conveyed these recommendations to the Prime Minister. As part of the Board's advisory function to government on energy issues, ***we request that the NEB discuss these other recommendations and pass on the Board's advice on these matters to the Minister of Natural Resources.***

Taken together, the eleven recommendations provide a blueprint for how Canada can make its offshore oil and gas program ready for the Arctic. Oceans North Canada stands ready to help in whatever way we can to assist in reforming the system along these lines.

Until these reforms are implemented, we believe the National Energy Board will not be able to meet its legislative and constitutional obligations to the Canadian public and Inuit.

***We urge the NEB to announce a sweeping regulatory reform program and to suspend approval for existing and future deepwater Arctic exploration licences until its completion.***

Thank you for your consideration of this matter and please let us know if we can be of any assistance.

Sincerely,



Trevor Taylor  
Policy Director

cc: The Honourable Joe Oliver, Minister of Natural Resources