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Environmental Health Program (EHP)
Regulatory Operations and Enforcement Branch (ROEB), Health Canada
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Colter Kelly
Impact Assessment Agency of Canada
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November 24, 2022

Sent by e-mail to: <email address removed>
aeic.gc.ca

and OffshoreWind-EolienneExtracotiere@iaac-aeic.gc.ca

Subject: Health Canada's Comments on the draft Agreement to conduct the Regional Assessment of Offshore Wind Development in Newfoundland and Labrador and Nova Scotia

Dear Colter Kelly:

Thank you for your email dated October 13, 2021 about the Impact Assessment Agency of Canada (IAAC)'s Notification of a Public Comment Period on the draft Agreements to conduct the Regional Assessment of Offshore Wind Development in Newfoundland and Labrador and Nova Scotia (draft Agreements) and the draft Terms of Reference. Health Canada is participating in the regional assessment process as a Federal Authority under the *Impact Assessment Act*.

Health Canada has reviewed the draft Agreements and is pleased to share our perspectives on these documents during this consultation period, recognizing the IAAC's role in soliciting views from all affected parties to ensure they are considered in the process going forward.

Should you have any questions regarding Health Canada's comments, please contact the undersigned.



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Sincerely,

Beverly Ramos-Casey
A/Manager,
EHP-Atlantic, ROEB
Health Canada

<email address removed>

cc:

Heather Jones-Otazo, A/Manager, Environmental Assessment and Contaminated Sites (EACS) Division, HECSB, Health Canada
Aurelia Thevenot, Senior Environmental Health Specialist, EACS, HECSB, Health Canada
Jérémié Allain, Impact Assessment Specialist, EHP-Atlantic, ROEB, Health Canada

Attachment: Table 1. Health Canada's Comments on the draft Agreement to conduct the Regional Assessment of Offshore Wind Development in Newfoundland and Labrador and Nova Scotia.

Table 1: Regional Assessment of Offshore Wind Development in Newfoundland and Labrador and Nova Scotia – Health Canada’s Comments on the draft Agreement to conduct the Regional Assessment of Offshore Wind Development in Newfoundland and Labrador and Nova Scotia (Public Comments due by Nov. 26, 2021)

ID	Reference to the draft Agreement	Context and Rationale	Health Canada’s Recommendations
HC-01	NS Draft Agreement, Definitions, pg.2 NS Draft Agreement, Definitions, pg.2	“Cumulative effects / impacts” is used throughout the draft Agreements without being defined in the “Definitions” section. The definition for cumulative effects should consider Indigenous perspectives that consider the cultural, social and health impacts in addition to environmental effects, as per the Indigenous Centre for Cumulative Effects .	Health Canada recommends that the definition for <i>cumulative effects</i> is added in the “Definitions” section and include the human environment, as well as the ecological environment.
HC-02	Appendix A, Analysis of Effects, Mitigation and Follow-up, section 1.6 t), pg. A-5	Although health is identified in the introductory sentence to section A1.6 t) on components of the regional assessment, none of the identified components refer specifically to human or Indigenous health. Therefore, it is unclear how the health component will be considered in the regional assessment.	Health Canada recommends the additional text in bold font be added to component v.: “Indigenous Communities, Activities and Rights, including health ”.