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Impact Assessment Agency of Canada
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Re: Comments on the draft Agreements and draft Terms of Reference for the Regional Assessment of Offshore Wind Development in Newfoundland and Labrador and Nova Scotia

Marine Renewables Canada (MRC) is the national association for offshore wind, tidal, wave and river current energy, representing technology and project developers, suppliers, utilities, researchers, Indigenous organizations, and communities. MRC has a growing membership, currently comprised of over 130 members including several offshore wind developers, suppliers with expertise in offshore industries and already active in offshore wind projects internationally, communities with close proximity and interests in offshore wind in Atlantic Canada, and researchers who have been active in environmental and technical marine renewable energy research.

MRC supports sector growth by advocating for supportive policies, identifying domestic and international business development opportunities for its members, facilitating collaboration amongst its membership and broader ecosystem, providing education and outreach, and disseminating market intelligence.

MRC is pleased to have the opportunity to comment on the *Draft Agreement – Newfoundland and Labrador*, *Draft Agreement – Nova Scotia* (Draft Agreements), and the *Draft Regional Assessment Terms of Reference* (the Draft Terms of Reference) (collectively, the Draft Documents) prepared for the Regional Assessment of Offshore Wind Development in Newfoundland and Labrador and Nova Scotia (the Regional Assessment) led by the Impact Assessment Agency of Canada. In developing this submission, MRC consulted with its membership and gained views of companies currently active in offshore wind energy development.

GENERAL COMMENTS ON THE DRAFT DOCUMENTS

- **The Regional Assessment should adequately consider potential positive impacts of offshore wind activities**

The goal of the Regional Assessment as stated in the Draft Agreements is to assess the potential effects of future offshore wind (OSW) development activities in the Study Area. Given the Regional Assessment has not yet taken place, it is still unclear what those potential effects could be. However, as written, the Draft Documents seem unbalanced in focusing on expected negative impacts. With the exception of the Draft Agreements preamble and a section entitled “Other Considerations and Requirements” in the Draft Terms of Reference, there is little mention of the assessment of potential positive impacts OSW development and projects could bring to Nova Scotia (NS), Newfoundland and Labrador (NL), and Canada as a whole. Left like this, it would appear that negative impacts are already known and expected, while positive impacts are either unknown, not identified, unexpected, or insignificant to the process.

As the Draft Agreements’ preamble highlights, the Regional Assessment is being conducted because of the momentum behind OSW as a promising source of renewable energy and due to the unique development opportunity that NS and NL present. Therefore, it is important that the Regional Assessment process, via the Draft Documents, assess the positive impacts of OSW thoroughly and with the same attention and robustness that potential negative impacts receive.

The Regional Assessment’s goal to “protect the environment and health, social and economic conditions” seems to presume that that status quo conditions are adequate. MRC agrees with this principle in some respects – it is imperative that potential environmental risks are well understood and mitigated, and that OSW can coexist with other marine users and uses. However, protecting the status quo is not an option where climate change is concerned. Facilitating the development of renewable energy sources is one way to mitigate the projected risks associated with climate change. As such, limiting the scope of the risk assessment to the impacts of OSW projects on the direct marine environment does not provide a complete picture. It is also important to understand and recognize the climate change impacts that are being avoided in the transition from fossil fuels to renewable energy sources like OSW.

Recommendation #1: MRC recommends that the Draft Documents lay a foundation for a more balanced assessment of OSW activities and include consideration and assessment of the following positive impacts of OSW development: production of clean electricity and how that will reduce reliance on fossil fuels; reduced emissions and related contributions towards carbon reduction targets; mitigation of current and future effects of climate change; and contribution towards local, provincial and national economic development. As it is absolutely necessary to reduce greenhouse gas (GHG) emissions to meet net zero grid and emissions targets, these benefits are critical to those

goals. (The table on page 11 of this submission further elaborates on where and how these positive impacts could be included in Section A1.6(t) of the Terms of Reference.)

- **The OSW Industry should be identified as a key stakeholder and the Draft Documents should recognize that input from the OSW Industry is essential to conducting a comprehensive Regional Assessment**

MRC's understanding is that these Regional Assessments are aimed at gathering information that will inform planning and management of the effects of future OSW projects. Therefore, input from the OSW industry is critical to gathering the information required to assess the risks and benefits of future OSW development activities. However, the word "industry" only appears once in the Draft Terms of Reference and may refer to the OSW industry, but this is not specified. OSW industry is not mentioned anywhere in the Draft Agreements. If OSW industry remains absent from the Draft Documents, there is a risk that the outcomes and reports from the Regional Assessment will be incomplete and inaccurate. Members of the OSW industry are best positioned to understand specific and technical aspects of OSW development activities, and therefore, provide the most complete information regarding building and operating OSW projects safely, efficiently, and effectively.

While this public comment process does provide an opportunity for anyone to comment on the Draft Documents, including OSW industry members, OSW industry is a key stakeholder that should be afforded a more material role in the Regional Assessment. The Advisory Groups are a mechanism for other key stakeholders like the Fisheries and Indigenous peoples to participate more actively throughout the Regional Assessment and MRC recommends that OSW industry should be provided with the same opportunity. This is not only because the outcome of the Regional Assessment will affect the OSW industry but, like other key stakeholders, perspective and existing experience from the OSW industry is crucial to the success and accuracy of this process.

As defined in the Draft Terms of Reference, the Advisory Groups must be composed so as to have and convey the "knowledge or experience deemed relevant to the Regional Assessment by the Committee." Further along in the Draft Terms of Reference, "offshore wind development activities" are identified as a topic that the Advisory Groups must be able to provide information and advice on. OSW industry knowledge and experience is not only relevant to the Regional Assessment, it is integral to the Committee's goal of gaining insight into OSW development activities.

It is currently unclear whether the Scientific and Technical Information and Analysis Advisory Group could include OSW industry members. If it cannot, it is unclear how the OSW industry can meaningfully participate in this process outside of this comment period, which does not permit consistent channels for input throughout the Regional Assessment and is not an adequate mechanism for a key stakeholder.

Recommendation #2: MRC recommends the inclusion of OSW industry in the Advisory Group membership through one of the following options: (a) industry representation on the Scientific and Technical Information and Analysis Advisory Group; (b) a separate advisory group of OSW industry representing different types of OSW developers (i.e. fixed technology developer, floating technology developer, project developer, etc.); and (c) it is also recommended that members of the OSW industry be identified as a resource to be consulted by the appropriate Advisory Group, as fisheries industry representatives are for the Fisheries Advisory Group.

- **The Draft Documents should establish clear time-limits and the Committee should respect them once established**

In the Drafts Agreements and pursuant to subsection 93(3)(a) of the *Impact Assessment Act* (the IAA), the Committee commits to complete its work and submit its Report to the Ministers within 18 months of the public announcement of the appointment of its members. Firstly, MRC would like to emphasize the importance of adhering to the time limits established in the Draft Documents, particularly for OSW Industry.

Secondly, MRC would like clarification on section A4 of the Draft Terms of Reference. This section allows the Committee to request clarification or amendment on the Terms of Reference from the Ministers and specifies that the Committee will continue with the Regional Assessment “to the extent possible” while awaiting a response. As drafted, MRC is concerned that there is nothing to prevent the Regional Assessment from being paused indefinitely in the event the Committee requires these clarifications or amendments. Ambiguity surrounding timelines creates confusion and can impact project timelines, investment decisions, and at a broader level, the ability to meet clean electricity and GHG reduction targets.

Recommendation #3: MRC recommends the Draft Documents (1) establish a clear time limit for the Ministers’ response to the Committee’s request for clarification or amendment to the Terms of Reference; and (2) establish a protocol or process the Committee must follow while waiting for the Ministers’ response to such a request to ensure that some work can continue in parallel. Finally, MRC wishes to emphasize the importance for OSW Industry of meeting, not exceeding, the established timeline.

- **The Committee should consider international experience on the development and operation of OSW projects and the Draft Documents should reflect the importance of this information, particularly when identifying and recommending mitigation measures**

Given that there are currently no operating OSW technologies or projects in Canada, MRC recommends that the Committee and Advisory Boards gather information and research produced from existing OSW development activities internationally. The Committee could also consider input from international industry and stakeholders who have direct experience with the development and operation of OSW projects. Otherwise, it will be challenging to produce a comprehensive

assessment of the potential risks and benefits of OSW projects without considering the existing body of knowledge and experience internationally where the OSW industry is more mature.

Consideration of existing knowledge of OSW development will also be important when identifying and recommending mitigation measures. The Draft Agreements state in section 1.2.c that one of the key objectives of the Regional Assessment is “identifying and recommending mitigation measures and other approaches for addressing potential positive and adverse effects (both project-specific and cumulative) as part of future decision-making for OSW development activities, in a manner that fosters sustainability.” As there has not been OSW development in Canada, MRC believes that the only way identification of mitigation measures can be robust and complete is if international experience and knowledge is gathered and identified by the Committee.

It is also important to recognize that given OSW is a rapidly evolving industry, mitigation measures identified today may quickly become outdated with new technology advancements. The Committee should focus on those issues that mitigation measures are intended to address and be cognisant of the fact that the way those issues are addressed may change in the future

Recommendation #4: Include reference to gathering and consideration of the international body of knowledge and experience in OSW development in the Draft Documents and in particular in sections A1.6(n)(o)(v) of the Draft Terms of Reference and sections 1.2(a)(c) in the Draft Agreements.

Recommendation #5: MRC recommends that the Regional Assessment’s identification of mitigation measures recognize that flexibility is needed to encompass new technologies and approaches that may not be used yet. This will help to avoid possible measures that could be obsolete in the future.

- **The Committee should consider use of existing data to inform and accelerate the Regional Assessment.**

There has been significant data collection in both offshore NL and NS to support offshore oil and gas development as well as other marine and offshore activities. Some of this data rests with the offshore petroleum boards, various government departments, and the private sector. This data can be used to inform and accelerate the RA process.

Recommendation #6: MRC encourages the Committee to access as relevant and existing data to as great of an extent as possible to inform the Regional Assessment. This will help to ensure that there is a clear and accurate picture of information gaps, as well as accelerate the process instead of seeking information that may already exist.

- **The Regional Assessment should assess the applicability of existing legislation to OSW development activities**

As part of the Regional Assessment, the Committee is tasked with identifying and considering existing relevant legislation, regulations, guidelines, and standards (section A1.6(w)). The regulatory

framework is a crucial aspect of Canada’s approach to developing OSW. Ambiguity surrounding regulations, permitting, timelines, and processes can create delays for OSW developers, challenges securing investment, and has wide ranging negative impacts on the industry.

Recommendation #7: MRC recommends that the Committee consider how existing legislation can effectively and efficiently govern OSW development and cover all the potential issues encountered when developing OSW. Early work should be done by government to determine the regulatory processes under existing regulations and ensure that they are transparent and predictable. For example, any types of risk assessments required by legislation such as the *Fisheries Act* or *Species at Risk Act* should be clearly outlined and detail what the requirements may be for environmental monitoring and mitigation measures. Without an early analysis of all legislation and regulations, regulatory uncertainty can occur and negatively impact project progress, investment decisions, and ultimately, the ability to meet climate change and decarbonization goals. (Note: MRC is aware and understands that *Offshore Renewable Energy Regulations* are under development under the *Canadian Regulator Energy Act* and are meant to address some of the potential regulatory gaps. This comment and recommendation is aimed at assessing existing legislation and regulations that may regulate other aspects of the marine environment or energy projects, such as permitting.)

- **The Regional Assessment should encompass the principle that flexibility will be needed when considering technologies in future impact assessments**

OSW technologies as well as enabling technologies like sensors and instrumentation used for environmental monitoring will likely evolve and change through innovation leading to improved and new technologies being used by industry in the future. Therefore, flexibility needs to be built into the final outcomes of the Regional Assessment to ensure future impact assessments are not limited by existing technology and methodologies, but instead, fully consider technology innovation and evolution.

Recommendation #8: MRC recommends that the Regional Assessment process as well as the final report include a principle of flexibility when it comes to what types of technologies may be introduced and used by industry.

- **The Regional Assessment Study Area for Nova Scotia should include the Strait of Canso**

The Strait of Canso is one of the only offshore areas of Nova Scotia not included in the Regional Assessment Study Area (Figure 1.1) in the Draft Agreement – Nova Scotia and there is no justification provided as to why it has been excluded. As the Strait of Canso is an area of serious interest for development by OSW industry, MRC recommends its inclusion in the map. If it is not included, there is concern that any future proposed development in the Strait of Canso will potentially be hindered by not having a body of knowledge and information established via a Regional Assessment process. While the Strait of Canso may be viewed as provincial jurisdiction when it comes to seabed, if a federal impact assessment can still be triggered via other federal legislation/regulations, it should be part of the Study Area.

Recommendation #9: Include the Strait of Canso area in the Regional Assessment Study Area for Nova Scotia within the Draft Agreement-Nova Scotia.

COMMENTS ON SPECIFIC SECTIONS OF THE DRAFT DOCUMENTS

Draft Agreement Newfoundland and Labrador & Draft Agreement Nova Scotia

The following are specific comments and suggested revisions for the Draft Agreement documents of both Newfoundland and Labrador and Nova Scotia.

Clause/Section	Pg #	Comment/Recommendation
<p>Preamble, para 6</p> <p><i>WHEREAS the Governments of Canada and Nova Scotia wish to enhance the effectiveness and efficiency of impact assessments for future offshore wind developments in the Canada-Nova Scotia Offshore Area.</i></p>	1	MRC supports the Regional Assessment’s goal of enhancing “the effectiveness and efficiency of impact assessments for future offshore wind developments” and encourages the government to prioritize and respect this important outcome.
<p>Section 1.4</p> <p><i>The Study Area for the Regional Assessment is as defined in Figure 1.1 below. The Study Area comprises portions of the Canada-Newfoundland and Labrador Offshore Area where future offshore wind development activities may be technically and economically feasible, based on current and foreseeable technologies. It does not include or exclude specific locations or features based on potential environmental, health, social or economic effects, in order to allow the Regional Assessment to provide a complete and fulsome analysis of these issues across this region, to inform future decision-making. For greater clarity, the inclusion or exclusion of specific portions of the Canada-Newfoundland and Labrador Offshore Area in the Study Area does not reflect whether particular locations will or should be subject to</i></p>	4-5	As drafted, this section creates uncertainty about whether another Regional Assessment would be required if OSW development was being considered in an area outside the Study Area.

future offshore wind development activities.		
<p>Section 2.7</p> <p><i>The Committee members will have knowledge or experience related to one or more of the following: impact assessment; regional assessment; environmental, health, social or economic effects (positive and adverse) and their management; sustainability; Indigenous and public participation; and/or Indigenous peoples and their communities, activities, interests, perspectives and knowledge.</i></p>	6	MRC recommends adding “offshore wind development activities” to the list of areas of knowledge or experience of the Committee.

Draft Regional Assessment Terms of Reference

The following are specific comments and suggested revisions for the Draft Regional Assessment Terms of Reference.

Clause/Section	Pg #	Comment/Recommendation
<p>Section A1.6(f)</p> <p><i>The role of these advisory groups will include assisting the Committee in identifying, accessing, analyzing and using information and knowledge that is relevant to the Regional Assessment, as well as in identifying and evaluating information and knowledge gaps and recommending approaches to address any knowledge gaps.</i></p>	A-2	MRC emphasizes that input from the OSW Industry throughout the Regional Assessment is required, in particular to assist the Advisory Groups with “identifying and evaluating information and knowledge gaps and recommending approaches to address any knowledge gaps.”
<p>Section A1.6(h)b-c</p> <p><i>Each of the advisory groups described below will provide information and advice to the Committee on the topics outlined below, as required and requested: [...]</i></p> <p style="padding-left: 40px;"><i>b. Future offshore wind development activities in the Study Area, including their:</i></p> <p style="padding-left: 80px;"><i>i. Purpose;</i></p>	A-3	This section identifies various aspects of OSW development activities, which the Advisory Groups are expected to provide information and advice on to the Committee. MRC flags that OSW Industry is best positioned to provide advice and information on these aspects of OSW development activities and recommends incorporating OSW industry perspective in the Advisory Group structure as noted in Recommendation #2 of this submission.



<p>ii. Associated physical activities;</p> <p>iii. Key areas of interest for future offshore wind development activities in the Study Area (to help focus the Committee’s work on locations which are most likely to see future development interest, based on technical and economic factors);</p> <p>iv. Regulatory requirements;</p> <p>v. Potential positive and adverse effects, including cumulative effects;</p> <p>vi. Mitigation measures and follow-up, and other approaches for avoiding or reducing potential adverse effects and creating and maximizing potential positive effects; and</p> <p>c. Other topics relevant to the Regional Assessment, as requested by the Committee.</p>		
<p>Section A1.6(m)</p> <p><i>This Advisory Group will seek scientific and technical information and advice from representatives of federal and provincial government, departments and agencies and non-governmental organizations and individuals (both Indigenous and non-Indigenous) on matters relevant to the conduct of the Regional Assessment. This will include information and advice related to environmental, health, social and economic components and issues.</i></p>	<p>A-3 – A-4</p>	<p>This section describes who may advise the Scientific and Technical Information Advisory Group and does not refer to “companies”. MRC would like clarification on whether a company would be eligible to provide information and advice to the Advisory Groups. In addition, MRC recommends adding language such that OSW industry representatives and OSW developers may provide information and advice to this Advisory Group.</p>
<p>Section A1.6(n)</p>	<p>A-4</p>	<p>MRC recommends including a reference to the international body of knowledge, as part of the relevant data and information informing the Committee’s scientific and technical analysis.</p>

<p><i>This Advisory Group will assist the Committee in gathering and analyzing relevant data and information and in conducting scientific and technical analysis, and will provide expertise in relation to the Regional Assessment. This will include sharing information and expertise on some or all of the topics listed above, as requested by the Committee during the conduct of the Regional Assessment.</i></p>		
<p>Section A1.6(o)</p> <p><i>This Advisory Group will seek knowledge, information and advice from fishing industry representatives and fishers regarding current and potential fishing activity, as well as potential interactions between fishing activity and offshore wind development activities in the Study Area and approaches for avoiding or minimizing adverse effects and creating or maximizing opportunities for positive effects.</i></p>	<p>A-4</p>	<p>This section outlines that the Fisheries Advisory Group will seek input from fishing industry representatives and fishers. MRC supports this, as industry input is a crucial to the success of the Regional Assessment. This section however appears to create ambiguity about what kind of organizations or individuals will be on the Advisory Groups - i.e. if the Fisheries Advisory Group will seek input from the fishing industry, then are fishing industry representatives not to be on the Advisory Group itself? If this is the case and representatives from the fishing and OSW industries are not to be on the Advisory Groups, MRC recommends including similar language offering OSW Industry representatives the opportunity to provide information and advice to an Advisory Group.</p> <p>MRC further recommends including a reference to the international body of knowledge, as part of the relevant data and information informing the Committee’s scientific and technical analysis.</p>
<p>Section A1.6(p)</p> <p><i>Identify, compile, review and present information on existing environmental, health, social and economic conditions within the Study Area.</i></p> <p><i>As noted in Section 3.5 of the Agreement, this will include information contained in any past or ongoing impact or environmental assessments (including strategic environmental assessments), and information provided by</i></p>	<p>A-4</p>	<p>MRC seeks clarification on what “industry” this section is referring to.</p>

<p>government, industry, academia, Indigenous peoples or the public.</p>		
<p>Section A1.6(q)</p> <p><i>Identify and evaluate information and knowledge gaps, with a focus on any associated gaps with relevance to, and implications for, future planning, licencing and impact assessments for offshore wind development activities in the Study Area.</i></p>	<p>A-4</p>	<p>This section addresses the process of analyzing existing conditions with an eye to identifying and evaluating knowledge gaps and the implications for future planning, licensing and impact assessments. Input from the OSW Industry is essential to this aspect of the Regional Assessment and MRC recommends incorporating similar avenues for OSW Industry feedback as are offered to other key stakeholders.</p>
<p>Section A1.6(s)</p> <p><i>Identify and consider the potential positive and adverse effects of future offshore wind development activities in the Study Area.</i></p> <p><i>This will include consideration of: potential malfunctions or accidents; any cumulative effects that may result from the effects of offshore wind development activities in the Study Area in combination with other physical activities that have been or will be carried out; and the result of any interaction between the effects referenced above.</i></p>	<p>A-4 – A-5</p>	<p>MRC recommends the Regional Assessment consider different types of OSW technologies (fixed and floating) when it considers the potential positive and adverse effects of OSW development activities.</p> <p>Moreover, MRC recommends including a final paragraph in this section, which elaborates on the potential positive effects of OSW activities. The focus on potential accidents and malfunctions in this section does not create a balanced image of the potential OSW activities present.</p>
<p>Section A1.6(t)</p> <p><i>In identifying and considering potential positive and adverse effects, the Committee will focus on the following environmental, health, social and economic components:</i></p> <ul style="list-style-type: none"> <i>i. Marine Fish and Fish Habitat</i> <i>ii. Marine and Migratory Birds</i> <i>iii. Marine Mammals and Sea Turtles</i> <i>iv. Protected and Special Areas</i> <i>v. Indigenous Communities, Activities and Rights</i> <i>vi. Fisheries and Other Ocean Uses</i> <i>vii. Visual Aesthetics / Viewscapes</i> 	<p>A-5</p>	<p>MRC recommends that the list of potential benefits/positive effects of OSW development be added to the list of focus areas for the Committee as follows:</p> <ul style="list-style-type: none"> x. Potential benefits/positive impacts: <ul style="list-style-type: none"> 1. Energy security 2. Biodiversity 3. Emission reductions/displacement of fossil fuel use for electricity 4. Economic investment and benefits 5. Contribution towards meeting environmental obligations (including net zero targets, emissions reductions targets, etc.)

<p>viii. <i>Physical and Cultural Heritage (including structures, sites or things of historical, archaeological, paleontological or architectural significance)</i></p> <p>ix. <i>Communities and Economy</i></p> <p><i>The Committee may, based on its analysis and engagement activity, further refine or add to the list of components listed above. If that is the case, the Committee will clearly document in its Report the rationale for doing so, including how public, stakeholder and/or Indigenous input have informed and influenced this.</i></p>		
<p>Section A1.6(v)</p> <p><i>Identify and consider technically and economically feasible mitigation measures and other approaches for eliminating, reducing, controlling or offsetting potential adverse effects and creating and maximizing potential positive effects resulting from offshore wind development activities in the Study Area.</i></p>	<p>A-5</p>	<p>MRC would like clarification on how mitigation measures will be identified and considered, and the sources used to identify and consider them.</p> <p>MRC recommends including a reference to the international body of knowledge, as part of the relevant data and information informing the identification of mitigation measures.</p>
<p>Section A1.6(w)</p> <p><i>Identify and consider existing legislation, regulations, guidelines and standards, and associated approvals or authorizations, that are relevant to avoiding or reducing their adverse effects.</i></p>	<p>A-5</p>	<p>MRC recommends any identification and consideration of existing legislation should include an assessment of whether the legislation, as drafted, can efficiently and effectively govern OSW activities.</p> <p>(Recommendation #6 above elaborates on this.)</p>
<p>Section A1.6(x)</p> <p><i>Identify and consider the extent to which offshore wind development activities in the Study Area and their potential effects, would: a) contribute to sustainability; and b) hinder or contribute to the federal and provincial governments' ability to meet</i></p>	<p>A-5 – A-6</p>	<p>MRC recommends putting the content in Section A1.6(x) under the previous heading. The analysis of the extent to which OSW development activities may contribute to sustainability and effect the government's ability to meet their environmental obligations should not be relegated to a section entitled "<i>Other Considerations and Requirements</i>". This analysis should carry the same weight as the components listed in Section A1.6(t) under the Subheading "Analysis of Effects, Mitigation and Follow Up."</p>

<p><i>their environmental obligations and commitments in respect of climate change, and make recommendations on the manner in which future licencing decisions and/or impact assessments should consider and address these factors.</i></p>		
<p>Section A1.6(z)</p> <p><i>Take into account any scientific information, Indigenous knowledge — including the knowledge of Indigenous women — and community knowledge provided with respect to the Regional Assessment.</i></p>	A-6	MRC recommends OSW industry knowledge be included in the sources of knowledge outlined in this section.
<p>Section A2.3 Objective A (b)</p> <p><i>b) An identification and analysis of key information gaps, requirements and opportunities, with a focus on those with relevance to, and implications for, future licencing and impact assessments for offshore wind development activities in the Study Area.</i></p>		MRC applauds and wishes to highlight the importance of the Regional Assessment’s goal to identify and analyze key gaps in future impact assessment processes, which currently may not be well suited for OSW.
<p>Section A2.3 Objective D (a)-(b)</p> <p><i>a) Recommendations on how to consider, implement or otherwise address the Regional Assessment findings in a clear, effective and efficient manner in future licencing and in impact assessments for future offshore wind development activities in the Study Area, and/or through other initiatives by governments or other parties.</i></p> <p><i>b) Recommendations for a Regional Assessment follow-up program to consider and incorporate any new or updated information that becomes available after submission of the final Report by the Committee, in order to help ensure that the Regional Assessment</i></p>	A-8 – A-9	With respect to how the Regional Assessment could be used to inform future planning and licensing processes, the recommendations should have enough flexibility to allow for new technologies that may not yet be commercially available or broadly used. (Recommendation #8 above elaborates on this.)

<p><i>remains current and useful into the future and continues to fulfill the goal and objectives of the Regional Assessment as outlined in this Agreement.</i></p>		
<p>Section A2.4 (a)-(b)</p> <p><i>The Committee will also include the following in its Report:</i></p> <p><i>a) A high-level, generic description of the types of offshore wind development activities that may occur in the Study Area, including their construction including expansion, operations and decommissioning phases as applicable. This will include fixed technologies (i.e., pile-driven platforms) as well as newer floating technologies and associated activities.</i></p> <p><i>b) The purpose of and need for offshore wind development activities in the Study Area, including their potential environmental, health, social and economic benefits.</i></p>	<p>A-9</p>	<p>The “high level generic description of the types of OSW development activities that may occur in the Study Area” and “the purpose of and need for offshore wind development activities” will require detailed input from the OSW industry. This reinforces MRC’s recommendation for OSW industry participation in the Advisory Groups.</p>
<p>Section A2.4 (c)</p> <p><i>An identification and analysis of any change to offshore wind development activities in the Study Area that may be caused by the environment.</i></p>	<p>A-9</p>	<p>MRC seeks clarification on the meaning of this section.</p>
<p>Section A3.1</p> <p><i>The Committee will complete its work in a phased manner and will, following the public review of drafts as referenced in Section A1.6 above, submit the various components of its Report to the Ministers as follows: [...]</i></p>		<p>Given time is of the essence for OSW industry, MRC wishes to emphasize the importance of adhering to the commitment to releasing the findings pertinent to licensing prior to other findings.</p>



<p>1 [...] Information and analysis to inform future licencing for offshore wind in the Study Area [...]</p>	
<p>2 [...] Identification of, and recommendations on, mitigation and other approaches to address potential effects, to inform future impact assessments for offshore wind in the Study Area [...]</p>	

Sincerely,

A handwritten signature in blue ink that reads "Elisa Obermann".

Elisa Obermann
Executive Director