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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**

Dear Members of the Impact Assessment Agency of Canada,

DP Energy is pleased to have the opportunity to comment on the *Draft Agreement – Nova Scotia*, *Draft Agreement – Newfoundland and Labrador*, and the *Draft Regional Assessment Terms of Reference* prepared for the *Regional Assessment of Offshore Wind Development in Nova Scotia and Newfoundland and Labrador* led by the Impact Assessment Agency of Canada (IAAC).

DP Energy is a leading Renewable Energy company with over 30 years' experience in the development, construction and operation of renewable energy assets globally. In Canada our portfolio of existing projects spanning the last decade includes 1GW of onshore wind and solar power, and a tidal stream-energy project in Nova Scotia. The company has also developed over 1GW of renewable energy projects across Australia, Ireland and the UK, with three quarters of these projects already built and operational. Currently, DP Energy has an immediate pipeline of 7GW across the aforementioned regions in onshore and offshore wind, solar and ocean energy projects, with 750MW due to enter construction in 2023.

DP Energy welcomes the IAAC's *Regional Assessment* and notes its particular relevance to the company's ambitions to develop offshore wind in Atlantic Canada. Currently the company is working to develop an early-stage catalyst offshore wind energy project off the eastern seaboard of Nova Scotia. In the offshore wind space outside of Canada, DP Energy is partnered with EDF Renewables for 1GW of offshore wind in the UK Celtic Sea, and with Iberdrola to deliver 3GW of offshore wind off of Ireland.

With regard to the *Draft Regional Assessment Terms of Reference*, DP Energy would encourage the IAAC to include the offshore wind industry as a key stakeholder in the assessment process – industry input is essential to conducting a comprehensive assessment of the potential positive and negative effects of offshore wind, while being fully aware of current and likely future constraints facing the industry. Accordingly, DP Energy is in full support of Marine Renewable Canada's submission of comments to the IAAC made on November 25, 2022 (Reference Number 23) with regards to the *Regional Assessment*.

Also, with regard the *Draft Regional Assessment Terms of Reference*, DP Energy asks that the list of environmental, health, social and economic components included in *Section A1.6(t)* be amended to include:

- Benthic habitats and communities
  - potential effect of habitat loss and disturbance to benthic communities (including sensitive/ designated habitats) during installation, decommissioning and operation (including risk of pollution effects)
- Marine geology - character and integrity of seabed
  - potential physical damage to seabed morphology from infrastructure and risk of pollution of seabed sediments
- Water quality –
  - risk of impact to the coastal and marine water environment (including chemical, physical, and biological characteristics)

DP Energy notes the significant opportunity for Canada's nascent offshore wind industry to apply experiences gained in jurisdictions where the industry is more developed. DP Energy has extensive experience working closely with Indigenous leaders and communities, governments, stakeholders, communities and consenting authorities both in Canada and in other jurisdictions. DP Energy encourages the IACC to avail of the experience from other jurisdictions to help inform the *Regional Assessment* and accelerate the offshore wind industry in Canadian waters.

Yours sincerely,



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