



Oceans North Comments on the Draft Agreement to Conduct a Regional Assessment of Offshore Wind Development in Nova Scotia

25th November 2022

Oceans North supports green solutions to fight the effects of climate change. Canada's 2030 Emissions Reduction Plan has made the commitment to achieve net-zero electricity by 2035 through the expansion of non-emitting energy. This will lay the groundwork to net-zero emissions by 2050.

The goal of the Regional Assessment is:

"To provide information, knowledge and analysis regarding future offshore wind development activities in the Study Area and their potential effects, in order to inform and improve future planning, licencing and impact assessment processes for these activities in a way that helps protect the environment and health, social and economic conditions while also creating opportunities for sustainable economic development."

The following text details our comments on the Draft Agreement (herein the "agreement") for the Regional Assessment (RA) of the Offshore Wind Development in Nova Scotia.

Section 1.2(a) of the agreement states:

"Providing information, knowledge and analysis related to environmental, health, social and economic conditions and the potential effects of offshore wind development activities in the Study Area, with consideration and weaving together of both Indigenous knowledge and scientific information."

The language used in this Section insinuates that Indigenous knowledge and scientific knowledge are different from one another, however, Indigenous knowledge systems are scientific in nature. As the goal of the RA is to provide information, it is important to acknowledge and understand the origin of such information. We advise that the language in this Section change to become "...both Indigenous Knowledge Systems and Western scientific information". This issue is again repeated in Section 3.3 with the text that states "...and knowledge (both Indigenous and scientific)..." and we ask that the language here be changed as per our previous recommendation.

Further, we advise that Two-Eyed Seeing (*Etuaptmumk* in Mi'kmaw) be used to guide the Regional Assessment throughout the entire process. Two-Eyed Seeing is the gift of multiple perspectives; a conceptual framework coined by Mi'kmaw Elder Dr. Albert Marshall in 2004 for unifying knowledge systems. It is described as "learning to see from one eye with the strengths of Indigenous knowledges and ways of knowing, and from the other eye with the strengths of Western knowledges and ways of knowing, and to use both these eyes together, for the benefit of all".^{1,2}

In Sections 1.4-1.5 of the agreement, the Study Area for the Regional Assessment is defined. While we understand that the inclusion or exclusion of specific portions of the Canada-Nova Scotia Offshore Area in the Study Area do not reflect whether particular locations will or should be subject to future offshore wind development activities, we feel it necessary to comment on such portions.

There is a significant lack of detail in the Study Area map, and it does not include any of the Other Effective Area-based Conservation Measures (OECMs) or the draft conservation network design for the Scotian Shelf-Bay of Fundy Bioregion (Figure 1). These OECMs contribute towards Canada's protected areas targets and any new activity undertaken in or near these areas may impact their contribution to these targets.

The overall intent of the conservation network is to ensure an effective balance among ecological, socio-economic, and cultural objectives in the use, management and conservation of our marine environment and spaces, and we believe these intended areas should be considered in the RA Study Area. Canada has committed to marine protected area standards. The assessment of industrial renewable energy should be included in these standards, particularly with regards to impacts on conservation objectives. One immediate way of guarding against any impacts on conservation objectives is to ensure that the draft protected area network is fully scoped into the Regional Assessment process. This is a more efficient process than undertaking a risk assessment of wind in every protected area.

Not including existing and proposed protected areas in the Study Area map gives us cause for concern that these areas will not be adequately considered and protected in future offshore wind activities. We recommend that the Study Area map show all current and drafted conservation areas, so the general public and stakeholders are aware of their existence and importance to the marine environment. The lack of inclusion of initiatives from other departments causes confusion with stakeholders and rightsholders and the general public, which can then lead to distrust and lack of engagement.

¹ Bartlett, C., Marshall, M., & Marshall, A. 2012. Two-eyed seeing and other lessons learned within a co-learning journey of bringing together Indigenous and mainstream knowledges and ways of knowing. *Journal of Environmental Studies and Sciences*, 2(4), 331-340.

² Reid, A.J., Eckhert, L.E., Lane, J-F., Young, N., Hinch, S.G., Darimont, C.T., Cooke, S.J., Ban, N.C., & Marshall, A. 2021. "Two-Eyed Seeing": An Indigenous framework to transform fisheries research and management. *Fish Fish*, 1-19.

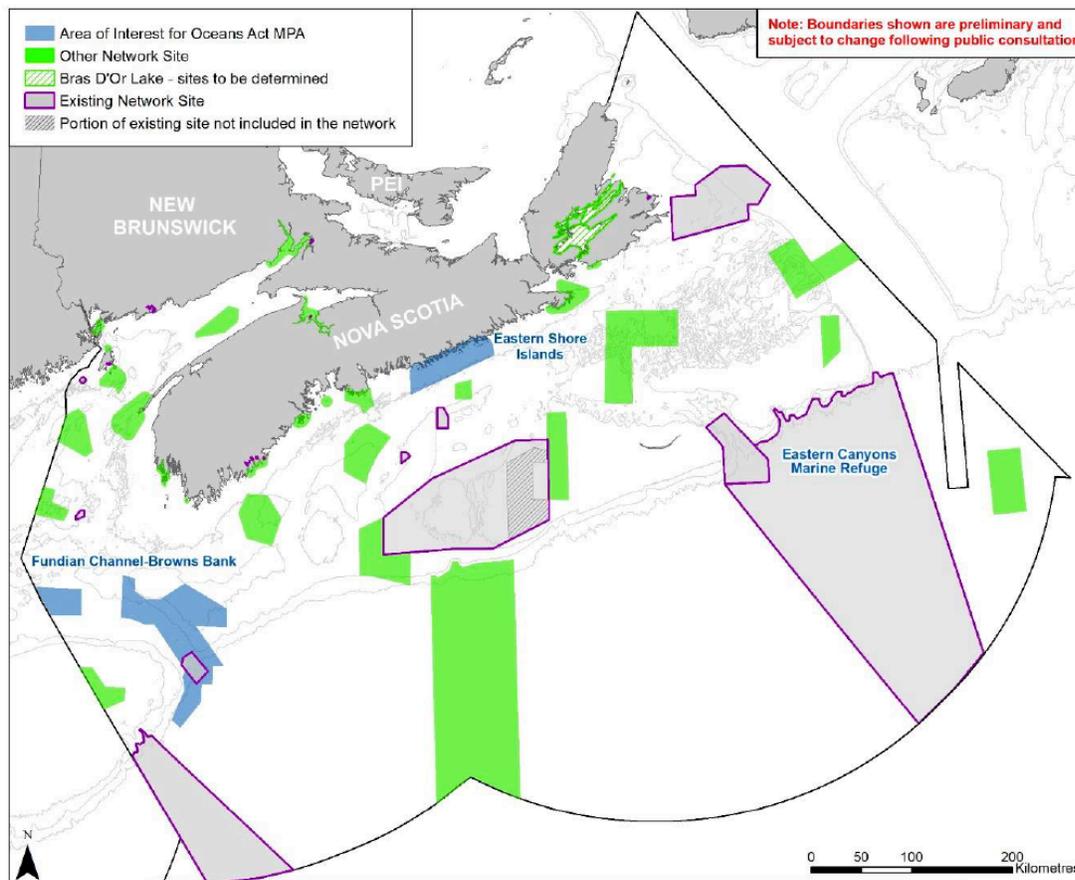


Figure 1. Map of the draft conservation network design for the Scotian Shelf-Bay of Fundy Bioregion. DFO gathered feedback on the draft conservation network design during Phase 1 of consultation. Note: The Eastern Canyons Marine Refuge was designated on June 8th, 2022. The map above includes the final boundary for the Marine Refuge, which was developed through a separate site-specific consultation process during 2021-22. The map used for Phase 1 of consultation on the draft conservation network design included the original study area boundary for the Eastern Canyons Marine Refuge³.

Finally, Section 6.2 of the agreement states:

“The Committee will complete its work and submit its Report (all components) to the Ministers within 18 months of the public announcement of the appointment of its members.”

We do not believe that 18 months is an appropriate timeline given the amount of consultation with Indigenous groups, government, industry, academia, and the public that is needed. We acknowledge that to mitigate the effects of climate change, fast action is needed. However, action should not be at the detriment to participants or the marine

³ Fisheries and Oceans Canada. 2022. What We Heard. Summary of Phase 1 of Consultation on the Draft Conservation Network Design for the Scotian Shelf-Bay of Fundy Bioregion. October 2022.

environment. We recommend that the timeline be adjusted so the RA process produces robust, trustworthy, and inclusive information.

Thank you for considering our recommendations.

A handwritten signature in black ink, appearing to read 'G. Rayner', with a long horizontal line extending to the right.

Gemma Rayner
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Oceans North