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Oceans North Comments on the Regional Assessment of Offshore Wind Development in Newfoundland and Labrador and Nova Scotia Draft Terms of Reference (Reference number 83514)

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Impact Assessment Agency of Canada
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Thank you for the opportunity to comment on the Regional Assessment of Offshore Wind Development in Newfoundland and Labrador and Nova Scotia Draft Terms of Reference. Oceans North supports the efforts to mitigate climate change, particularly the required paradigm shift to renewable energy provision. Canada's 2030 Emissions Reduction Plan includes 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 Terms of Reference (ToR) for the Regional Assessment (RA) of the Offshore Wind Development in Nova Scotia.

Our first recommendation is to center the descriptions of offshore wind activities and their impacts. These are mentioned in Sections A2.4 (a-c) to be "also included." We would like clarification as to why this section is placed in a position of "also included" when this seems to be the purpose of the entire assessment. Understanding these activities and their impacts are an integral part of the structure of the regional assessment. They directly relate to the goal of the RA to provide information, knowledge and analysis regarding

future offshore wind development activities and should form the basis of the Report that the Committee. The purpose of a Regional Assessment is to understand the impacts of the proposed activities and support future project-level assessments. Therefore, a full assessment of activities as we understand them are the foundation of this assessment.

Secondly, Section A1.6t identifies the environmental, health, social, and economic components to be considered regarding the potential positive and adverse effects of the RA. We have noted that there is a significant lack of any reference to ecosystems, ecosystem structure, functions, or processes. We suggest that ecological functions and structures be added to the component list. These should be added in a manner that is in line with other planning processes, including DFO's Marine Spatial Planning initiative and DFO's Marine Protected Area Network in the Newfoundland and Labrador Region.

When considering the component of Community and Economy, we suggest the economic and social assessment include the manner of ownership and management of offshore wind energy. The RA should assess the impact of wind developments on local economies, including impacts of equitable investment opportunities and innovative investment tools such as community economic investment funds.

In Section A1.6p we recommend also leveraging recent Regional Assessments, including their associated GIS databases to ensure that these data are used for the current Regional Assessment. It is integral to streamline data sharing between assessments and between governmental departments regarding marine spatial planning.

Overall, the approach to Indigenous Knowledge Systems requires deeper consideration. The following sections provide suggestions to consider.

Section A1.4 of the ToR states:

"In conducting its work, the Committee will recognize that, for the purposes of the Regional Assessment, Indigenous Knowledge is an important component of understanding existing conditions, potential effects (both positive and adverse) and mitigation measures, and that regional assessments can provide a means of weaving together scientific information and Indigenous Knowledge to inform future impact assessments."

The language used in this section insinuates that Indigenous knowledge and scientific knowledge are different from one another. 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 recommend that the language in this section change to become "... that regional assessments can provide results from Western scientific information and Indigenous Knowledge Systems". This is also mentioned again in section A1.6g and A2.3.

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]}

Section A1.6z states:

“Take into account any scientific information, Indigenous knowledge — including the knowledge of Indigenous women — and community knowledge provided with respect to the Regional Assessment.”

We question whether the perspectives of Indigenous women are already being considered in the aforementioned Indigenous Knowledge and ask clarification on the relevance and placement of this section.

Following our previous comments regarding Section A2.4, we recommend that the Section start at Section A2.4d. We also recommend that an additional Section be added to provide an overview of how the federal United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) Act and its associated provisions of Free, Prior and Informed Consent (FPIC) were considered.

In conclusion, Section A3.1 it states that the *“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”* will be submitted to the Ministers 18 months from the Committee appointment.

We do not believe that 18 months is an appropriate timeline given the amount of consultation and involvement required with Indigenous groups, government, industry, academia, and the public. We acknowledge that to mitigate the effects of climate change, fast action is needed. However, action should not be at the detriment to the aforementioned groups, the established Committees, or the marine environment. We recommend that the timeline be adjusted so the RA process produces robust, trustworthy, and inclusive information.

We look forward to further participation in this process.

Sincerely,

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Oceans North

^[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., Eckhart, 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.