



Newfoundland  
& Labrador  
Wildlife  
Federation

**SUBMISSION TO:  
IMPACT AGENCY OF  
CANADA – OFFSHORE  
WIND DEVELOPMENT  
DOCUMENTS.  
NOVEMBER, 2022**

In the documents of Regional Assessment of Offshore Wind Development in Newfoundland and Labrador and Nova Scotia on the Draft Agreements and Draft Terms of Reference there are a few sections which our federation would like some clarification. In section 1.2.b of the Draft Agreement – Newfoundland and Labrador document reads “Providing an understanding of the regional context that can be used in considering and evaluating the effects of future offshore wind development activities, to inform future planning and licencing processes and impact assessments, including the management of cumulative effects.” We would want to know in what specific way these “cumulative effects” will be classified and defined. All activities being conducted in a given area should be documented and classified in order to properly understand the various impacts of small, medium, and large scale cumulative effects have over time. These cumulative effects may have various negative impacts on marine ecosystems, marine life, and avian species over time and must be documented.

The impact on marine mammals and sea birds in the surrounding areas of offshore wind development must be a major area of consideration when considering an area for development. In section 1.2.c of the Draft Agreement – Newfoundland and Labrador document reads “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 offshore wind development activities, in a manner that fosters sustainability.” There should be more clarification on what constitutes “other approaches” in this section. An example would be an environmental monetary fund in case of any negative environmental impacts. In order to properly mitigate environmental problems in the future, a monetary fund with sufficient investments from various parties involved with offshore wind developments must be made for ecosystems and wildlife to be protected.

Yours in Conservation,

Andrew Bouzan, President,

Newfoundland and Labrador Wildlife Federation.

Cc: NLWF Board – of – Directors.