



**Seafood Producers Association of Nova Scotia**  
**Association des Producteurs de Fruits de Mer de la Nouvelle Ecosse**

1801-45 Alderney Dr., Dartmouth, N.S. B2Y 2N6 Tel: (902) 463-7790 Fax: (902) 469-8294

November 25, 2022

Impact Assessment Agency of Canada

**Re: Regional Assessment of Offshore Wind Development in Newfoundland and Labrador and Nova Scotia.**

Please accept the following submissions on behalf of the Seafood Producers Association of Nova Scotia.

Climate change is the challenge of our time and SPANS supports robust and expeditious action to achieve net zero emissions. SPANS supports the development of offshore wind provided it is done in a manner that respects the environment and allows for continued access to fisheries resources. SPANS looks forward to participating in the Regional Assessment and offers the following comments on the draft agreement and terms of reference:

**Draft agreement**

- There is no definition for “environment”. The draft agreement incorporates several definitions from the *Impact Assessment Act* such as “sustainability” and “mitigation measures”, but does not do the same for “environment” (despite using this term throughout the document). SPANS suggests incorporating the definition from the Act or otherwise making clear that the environment includes ecological aspects such as marine fish and their habitats, marine and migratory birds, and marine mammals and sea turtles.
- Given the urgency of climate change, SPANS questions why such a broad Study Area is being undertaken under sections 1.4/1.5 and figure 1.1. It seems that any Regional Assessment of such a broad area will cause undue delay in completion or will be so broad as to be ineffective for its possible uses under the Act. SPANS recommends a more focused approach to the geography of the Regional Assessment in order to support Canada’s important climate goals.
- Section 4.1 should be amended by striking out “Advisory groups will be established” and substituting “Advisory groups must be established” to clarify the imperative nature of these advisory groups.

**Draft terms of reference**

- Clause A1.6(c) should be amended to clarify that the Committee must consult with the Fisheries Advisory Group and therefore that group must be struck before the development and implementation of the *Public, Fisheries and Stakeholder Participation Plan*.
- Clause A1.6(e) should strike out “from within or outside of government” and substitute “from within and outside of government” to make clear that the composition of the advisory groups includes representation from both inside and outside government, not one or the other.



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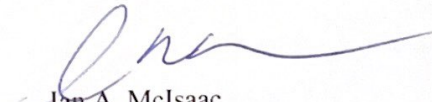
- Clause A1.6(h)(a) should be amended to make clear that the Regional Assessment will focus not simply on the economic conditions in the Study Area, but rather the economic conditions relating to the Study Area, given that most of the value added to the fisheries resources from the Study Area occurs after harvest and not necessarily in the Study Area. SPANS suggests that this change be considered elsewhere in the Terms of Reference (such as A1.6(p) and A2.3(a)).

Further, as a general matter relating to the proposed Advisory Groups, SPANS urges that the Committee allow for representation on multiple groups where appropriate and to facilitate such groups in "advisory council" type meetings where appropriate. This is due to overlapping expertise in science and resource management held by many operators and associations in this sector, as well as the potential overlapping mandates of these groups.

SPANS further suggests that the Draft Agreement and Terms of Reference be amended where appropriate (for example, the recitals) to more clearly state that the Regional Assessment is not intended to be used to avoid a full impact assessment in future wind developments or to otherwise avoid application of the Act (for example, by allowing a series of "small" wind developments that might otherwise be permissible under the *Physical Activities Regulations*).

We thank you for the opportunity to provide comments and look forward to participating in the Regional Assessment.

Sincerely,



Ian A. McIsaac  
President