



Accelerating Clean Growth  
Newfoundland & Labrador

**Feedback on Draft Agreement  
and Draft Terms of Reference**

for

**Offshore Wind  
Regional Assessment**

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On behalf of its membership, *econext* is pleased to provide feedback on the *Draft Agreement to Conduct a Regional Assessment of Offshore Wind Development in Newfoundland and Labrador* and the *Draft Regional Assessment Terms of Reference*.

*econext* is a not-for-profit association of businesses that accelerates clean growth in Newfoundland and Labrador, working on behalf of over 200 members to envision, support, and enable environmentally sustainable economic development within the province. More information on *econext* can be found on its website at [www.econext.ca](http://www.econext.ca).

The following feedback was acquired through one-on-one engagement within the *econext* membership and in consultation with other key industry stakeholders.

## Create More Opportunities for Industry to Participate

The draft documents do not wholly consider the expertise that exists within industry as it relates to a Regional Assessment for offshore wind. In the Draft Agreement, section A1.6 (b) references industry as being one of the stakeholders with whom engagement is required. The Draft TOR, in section 3.5, references industry as being a potential source of information.

While offshore wind development is new to Canada, it is not new to the world. Offshore wind energy has existed for over 30 years. During this time, many Canadian companies have had the opportunity to supply the international industry with technologies and services. In addition, Canadian companies have invested in or are the lead developer of offshore wind projects worldwide. It is important for the Regional Assessment process to benefit from the practical expertise gained by industry.

As it is industry who will be the driving force behind offshore wind developments, a more direct role in the Regional Assessment process is advisable. An 'Industry' advisory group should be considered in addition to the other three that have been identified.

## Ensure Mitigation Measures are not Overly Prescriptive

1.2 Section C of the Draft Agreement references the 'identification and recommendation of mitigation measures'. The Draft TOR (Section u) dictate that the committee 'Identify and consider technically and economically feasible mitigation measures'. The committee report guidelines in Section A2 Objective C makes similar commitments.

The Regional Assessment must take care not to be overly prescriptive in the technologies and processes that should be used. Technologies and processes advance over time, and innovation will yield solutions that have not yet been considered or conceived. Overly prescriptive measures will commit stakeholders to technologies and processes that may become obsolete, inhibiting innovation.

While there will be great value in suggesting or recommending mitigation measures, the Regional Assessment process should be prescriptive in the desired outcome (e.g., environmental protection) but not prescribe the use of specific technologies or processes.

## Expand the Area of Study

Since it is the stated purpose of the Regional Assessment to help inform future decisions around whether particular locations will be subject to future licencing processes for offshore wind development activities, the area of study should include areas of potential future oil and gas projects.

Offshore wind energy has been identified through extensive research and consultation with key stakeholders through [The Net Zero Project](#) as a promising emissions reduction pathway for the offshore oil and gas industry (or even carbon capture and storage facilities) from both technical and economic perspectives. While water depths of potential future petroleum production facilities are at the limits of existing and wind energy facilities, rapid advancements in technology continue to redefine those limits.

Should this undertaking expand the scope of the Regional Assessment beyond what is reasonable, a Phase 2 of the process should immediately follow Phase 1 – leveraging information and expertise gained through Phase 1 – which includes more geographic areas. This will enable future investments in renewable energy.

## Define How the Regional Assessment will Enhance Effectiveness and Efficiency

A stated goal of the Regional Assessment, per the Draft Agreement, is to 'enhance the effectiveness and efficiency of impact assessments for future offshore wind developments in the Canada-Newfoundland and Labrador Offshore Area'. This goal is appreciated, but there are few details as to how this might be achieved.

The objectives listed in Section 1.2 conceivably might support this goal. The time and effort required by a panel of experts to study, engage, and report on the potential impacts of offshore wind – in addition to that of those participating in the process as stakeholders – suggests and warrants that future site-specific processes should be less onerous.

However, without clear definition of how exactly the Regional Assessment will expedite future regulatory process, the exercise runs the risk of being entirely replicated for future project-specific impact and environmental assessments.