



December 19, 2024

**Re: Regional Assessment of Offshore Wind Development in Nova Scotia.
Comment on Draft Regional Assessment Report**

This submission is on behalf of the Strait Area Chamber of Commerce, requesting reconsideration of the Regional Assessment Committee's recommendation to exclude the Strait of Canso region from offshore wind development at this early stage. As a Chamber, we recognize the positive economic and social impact of industrial and commercial infrastructure in the Strait Region and support a process that ensures projects are approved only when they meet the highest standards of environmental and economic sustainability. This is in keeping with the Chamber's goals for the region as outlined in our Industrial/Commercial Infrastructure Development Policy (see attached).

We are concerned about the exclusion of areas in proximity to the Strait of Canso without sufficient evidence or rationale. We feel it is premature to assume the areas outlined for exclusion would not have pockets of favorable areas and strong justification for development. The Strait Area Chamber of Commerce is not advocating for unrestricted development in coastal waters. However, we support development that has cleared a rigorous, transparent, and comprehensive review process. Although the Regional Assessment Committee has considered some of this in broad scope, we feel that, at this stage, there is not enough information or evidence to justify the exclusion of large parcels of offshore areas. As noted, we would support a rigorous review of individual projects, factoring in proximity to sensitive marine areas, shipping routes, fishing grounds, and so on, to ensure they meet the highest standards of safeguards for the environment and are in the best interest of the region.

The Chamber's Energy Policy (see attached) states that Nova Scotia needs to focus on developing competitive, sustainably produced, and transportable energy so businesses of all sizes can remain competitive and maximize job opportunities. Offshore wind development in the Strait of Canso aligns with this policy by offering a source of clean energy that could create jobs and stimulate economic growth in the region. We are deeply concerned about the economic impact of excluding waters off our region at this stage. We believe that the port and infrastructure in our region offers significant advantage to offshore wind developers and excluding waters in proximity to the Strait of Canso now is limiting to development of the industry in Nova Scotia. We do not see sufficient rationale for the exclusion that outweighs the negative impact this will have on our region by blocking access to this emerging industry, before it gets started.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Jeremy Carroll".

Jeremy Carroll
President
Strait Area Chamber of Commerce

A handwritten signature in black ink, appearing to read "Tanya Felix".

Tanya Felix
Executive Director
Strait Area Chamber of Commerce

Industrial / Commercial Infrastructure Development Policy

The Strait Area Chamber of Commerce (SACOC) recognizes the positive economic and social impact that industrial and commercial infrastructure has on the Strait Region and the Provincial Economy. All stakeholders should be encouraged to promote the development of the infrastructure necessary to support existing business models, enhance market access and generate healthy returns which will result in a strong Nova Scotia economy.

The Strait Area Chamber supports industrial and commercial infrastructure developments that comply with regulatory requirements of government. Developments supported by the Chamber should follow the following general guidelines:

1. New infrastructure development, or changes to existing infrastructure must have a focus on safety, environmental and community impacts.
2. New infrastructure developments, or enhanced developments in sectors such as energy, tourism, information and communications technology, manufacturing, forestry, transportation, and oceans (among others) should have a demonstrable positive impact on the economy of the Strait Region. This positive impact should include some, but not be limited to the following:
 - a. Increased workforce during construction,
 - b. Long-term job creation,
 - c. Skills development opportunities for the local workforce,
 - d. Opportunities for enhanced efficiency for existing business,
 - e. Ability to access new markets, and
 - f. Increased labour income and/or GDP growth.
3. Infrastructure developments must be sustainable in the long term, with a committed business partner.
4. Infrastructure development must allow for public consultation/engagement, including with First Nations stakeholders, as required by government regulations.
5. Proponents of infrastructure development will be encouraged to use local suppliers.

It is recognized that the execution of this policy will require strong leadership, communication, consensus building and teamwork of all stakeholders.

Energy Policy

The Strait Area has a diverse economy. Agriculture, fishing, forestry, mining and tourism have been part of the economy for hundreds of years. Having a large part of the economy linked to these sectors, the Strait Area Chamber of Commerce acknowledges that Nova Scotia is and needs to continue to be a competitive, reliable, environmentally progressive energy producing and consuming province.

To achieve this goal all levels of government must ensure sources of energy are accessible, affordable, practical, and sustainable. Without balancing these conditions, energy security in Nova Scotia will be at risk and businesses in Nova Scotia will struggle to remain competitive.

Climate change is of major concern to all Canadians. Canada has committed to reduce its carbon footprint and has set GHG reduction goals for our country. As of January 2017, with regards to electricity production, Nova Scotia has achieved better results on carbon reduction than any other province. In fact Nova Scotia has already surpassed the Government of Canada's target of reducing GHGs by 30% below 2005 levels.

Nova Scotia businesses need to maintain their competitiveness in this new energy landscape. During this evolution we must recognize that sectors of the economy and some regions of the province will be more carbon-dependent because of the lack of low carbon infrastructure or the inability to quickly implement innovation. Without this realization, these regions of our province and the economy (including agriculture, fishing, aquaculture, tourism, etc) will be negatively impacted.

To become a progressive energy producer, Canada must address three key components:

ENVIRONMENTALLY RESPONSIBLE ENERGY PRODUCTION/CONSUMPTION

1. Increase investment in competitive low carbon energy infrastructure.
2. Move towards a long term low carbon economy by:
 - a. Utilizing low carbon energy resources.
 - b. Investing in R&D to reduce the carbon footprint.
 - c. Using technology to reduce the carbon footprint.
3. Have substantive, thorough and timely environmental review processes.

ENERGY SECURITY & AVAILABILITY

4. Invest in electrical transmission infrastructure to allow low carbon energy to flow between provinces.
5. Support pipeline infrastructure to allow the movement of Canadian resources between provinces and for local and export opportunities.
6. Support safe energy storage to complement renewable resources.

COST COMPETITIVENESS

7. Utilize existing energy infrastructure for its full life cycle term to avoid stranded assets and to control energy costs.
8. Support industrial energy efficiency and energy solutions that complement the GHG emission strategy.
9. Achieve predictable and reliable energy supply/rates for business sectors that are reflective of the sector's impact on the economy.

Nova Scotia needs to focus on developing competitive, sustainably produced and transportable energy, particularly in partnership with the other Atlantic provinces, so businesses of all sizes can remain competitive and maximize job opportunities.

It is recognized that the execution of this policy will require strong leadership, communication, consensus building and teamwork of all stakeholders.