



Oceans North Comments on the Draft Regional Assessment Report for Offshore Wind Development in Nova Scotia

20th December 2024

Oceans North's Position on Offshore Wind Development

Oceans North supports a just and equitable transition from fossil fuels to renewable energy sources, recognizing the critical role this shift plays in reducing greenhouse gas emissions. We believe that renewable energy development, particularly offshore wind, must be conducted in a manner that enhances, rather than undermines, the integrity of protected marine areas, the sustainability of fisheries, and the social and economic well-being of communities in affected regions.

We commend Canada's 2030 Emissions Reduction Plan, which includes a commitment to achieve net-zero electricity by 2035 through the expansion of non-emitting energy sources, laying the foundation for a broader goal of achieving net-zero emissions by 2050. The Regional Assessment for offshore wind development in Nova Scotia is a positive step towards addressing climate change. Below, we outline our recommendations for improving the assessment process.

Community Benefits of Renewable Energy Development

We support the transition to renewable energy and acknowledge the positive role offshore wind energy can play in reducing greenhouse gas emissions, contributing to Nova Scotia's climate goals, and moving towards a low-carbon energy system. However, this needs to be done in a way that maximizes community benefits, including access to that energy by communities to reduce emissions and energy costs, providing job opportunities in communities adjacent to wind farms that are reflective of the Gender Based Analysis Plus (GBA+) assessment, meaningful and equitable financial benefits that prioritize communities over industry profits, and partnership/ownership opportunities for communities where relevant and desired.

The development of renewable energy must be paired with stringent environmental protections.

Fisheries

We recommend that the Committee continue to engage with the fishing industry to ensure that offshore wind developments do not negatively impact commercial fishing grounds and the livelihoods of commercial fishers, particularly for stocks that are in the Critical Zone of DFO's Precautionary Approach Framework. We recommend that the Committee include a table that shows the stock and its status within DFO PA Framework as a point of reference within the draft report.

We recommend that the Committee look at the climate risk index (Boyce et al. 2022; 2024) and explore climate change scenario planning for commercial and at-risk marine species that has case studies focused on Atlantic Canada. Buffer zones and scenario planning are also ways to mitigate the effects of the lack of tangible stock assessment in some areas for forage fish stocks and will incorporate a precautionary approach to species risk management in the face of climate change.

Additionally, we recommend that the Regional Assessment also incorporates climate resilience strategies for offshore wind infrastructures and how resilient those infrastructures will be to climate change. The Regional Assessment should consider the region's harsh weather and ensure that all future wind installations must be climate-proof to enable their long-term viability and minimize risks to marine life in case of structural failures or accidents.

Indigenous Knowledge and Two-Eyed Seeing (Etuaptmumk)

We commend the inclusion and application of Two-Eyed Seeing throughout the Regional Assessment process and encourage the Committee to maintain this approach as the project moves forward.

Cumulative Effects Analysis

While we appreciate the analysis the Committee has conducted and the tiered reality of a cumulative assessment, we still find it deeply concerning that the Regional Assessment for Nova Scotia does not include a full Cumulative Effects Analysis (CEA). We support the methodology that the Committee undertook to

address cumulative effects on a regional scale, however we recommend that further work be done to fully understand the impacts of offshore wind developments to the wider ecosystem.

Thank you for considering our recommendations.

Gemma Rayner
Fisheries and Special Projects Advisor
Oceans North

References

Boyce, D.G., Tittensor, D.P., Garilao, C., Henson, S., Kaschner, K., Kesner-Reyes, K., Pigot, A., Reyes Jr., R.B., Reygondeau, G., Schleit, K.E., Shackell, N.L., Sorongon-Yap, P. & Worm, B., 2022. A climate risk index for marine life. *Nat. Clim. Chang.* 12, 854–862.

Boyce, D.G., Tittensor, D.P., Fuller, S., Henson, S., Kaschner, K., Reygondeau, G., Schleit, K.E., Saba, V., Shackell, N., Stanley, R.R.E. & Worm, B., 2024. Operationalizing climate risk in a global warming hotspot. *Nature.* 3(33).