

Regional Assessment of Offshore Wind Development in Newfoundland and Labrador
Impact Assessment Agency of Canada
301-10 Barbers Hill
St. John's, Newfoundland and Labrador A1C 6M1

September 22, 2023

RE: REQUESTED FEEDBACK ON PROPOSED FOCUS AREA

To Whom it May Concern:

I am writing on behalf of Canadian Parks and Wilderness Society – Newfoundland and Labrador Chapter (CPAWS NL), an environmental non-profit committed to the preservation and sustainable management of our environment. We appreciate the opportunity to provide feedback on the proposed focus area.

We would like to express our support for the committee's decision to employ a precautionary approach in this assessment. It is important that this process considers the long-term health and integrity of our marine environment, and we strongly encourage the committee to continue this approach and exclude Marine Protected Areas (MPAs) and SARA Critical Habitats from the proposed focus area. MPAs play a pivotal role in safeguarding marine biodiversity and habitat, and we believe their exclusion from the focus area is a prudent decision that aligns with our conservation goals. Protecting the habitats of aquatic species at risk is vital for the survival of endangered and threatened species, and we fully support this measure.

However, we would like to express our concern regarding the overlap between the proposed focus area and the proposed South Coast Fjords National Marine Conservation Area (NMCA), which is currently in the feasibility assessment stage. NMCAs are integral to Canada's commitment to marine conservation, and we believe it is essential to ensure the compatibility and coexistence of offshore wind development with the objectives of marine conservation. The South Coast Fjords are an ecologically important area to many SAR, and a culturally and historically significant area to our First Nations. The protection of this area is important to prevent further habitat and biodiversity loss. Considering these concerns, we encourage the committee to work closely with Parks Canada and project partners (Miawpukek First Nation, Qalipu First Nation and the town of Burgeo) to ensure that the RA Focus Area does not infringe on the proposed NMCA boundaries, and that the work you are doing on implementing renewable energy in the province does not jeopardize future marine protections.



We would also like to acknowledge that the proposed focus area overlaps several Significant Benthic Areas, including aggregations of sponges and sea pens, and reinforce the importance of considering these sensitive benthic habitats in the process. Cold-water sponges and corals are important components of benthic ecosystems, that provide complex habitat structure important to invertebrates, fish, and other sea life. Due to their slow growth rates, mitigation of impacts on SBAs is essential in avoiding serious and irreversible harm to these already vulnerable systems.

In conclusion, we appreciate the committee's dedication to responsible offshore wind development and the preservation of our marine environment. We trust that you will consider our feedback and work towards a solution that accommodates both sustainable energy generation and the conservation of our marine environments and species, while consulting with First Nation rightsholders within and adjacent to the area. Thank you for your attention to this critical matter. We look forward to continued collaboration and dialogue as we collectively strive to protect and nurture our precious marine ecosystems.

Regards,



Mikaila Bickford

Ocean Conservation Manager, CPAWS NL

