

# INNU NATION



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September 22, 2023

Committee for the Regional Assessment of Offshore Wind Development in Newfoundland and Labrador

[OffshoreWindNL-EolienneExtracotiereTNL@iaac-acic.gc.ca](mailto:OffshoreWindNL-EolienneExtracotiereTNL@iaac-acic.gc.ca)

Re: Proposed Focus Area – Innu Nation Comments

Dear Committee,

Thank you for the opportunity to submit comments in relation to the Proposed Focus Area for the Regional Assessment of Offshore Wind Development in Newfoundland and Labrador re-issued on August 21, 2023.

In our comments on the Draft Agreement and Terms of Reference (ToR), Innu Nation raised the concern that the Study Area for the Regional Assessment, being on the order of 300,000 km<sup>2</sup> and encompassing more than 10,000 km of coastline was not conducive to an assessment that would meet the intended goal and support the objectives of this Regional Assessment. In essence, the Study Area was too large for an informative assessment to be completed within the available timeframe.

While Innu Nation is generally supportive of the efforts by the Committee to attempt to focus this Regional Assessment, the Proposed Focus Area represents a fundamental and unsupported reduction in the geographical scope of the Regional Assessment. In other words, by entirely omitting three important regions (Labrador coast, the northeast coast of Newfoundland, and the Jeanne d'Arc Basin oil and gas region), the Proposed Focus Area may be undermining the ultimate development of any offshore wind industry in the Province. This Regional Assessment was designed to assess this development potential, not predetermine it by removing most of the original Study Area without a reasonable basis for doing so. If the Proposed Focus Area is adopted, Innu Nation does not believe that the goal of this Regional Assessment would be achieved, namely "to provide information, knowledge and analysis regarding future offshore wind development activities in the Study Area" since the bulk of the Study Area would be omitted from meaningful consideration during this Assessment.

Our review of the Proposed Focus Area considers the following questions:

**Evaluated criteria.** *Were the criteria used to determine the Proposed Focus Area appropriately determined and evaluated? Here we focus on the adequacy of the literature reviewed to determine the Proposed Focus Area.*

**Additional criteria.** *What are the implications of additional relevant criteria or factors for determining a Focus Area that were not considered? Here we consider the implications of wind integration into the existing grid, the forms of a potential wind industry in the Province and the implications for determining an appropriate Focus Area.*

**Additional focus areas.** *Based on this review, available information and completed studies are there other focus areas that merit consideration by the Committee? Here we present some possible additions to the Focus Area for this Regional Assessment.*

As noted in our earlier comments on the Draft Agreement and ToR, any focusing of the Regional Assessment should consider at least two regions off the coast of Newfoundland and one off the coast of Labrador. In the Labrador coastal region within the Study Area, the coastline in and adjacent to Sandwich Bay is one potential addition to the Focus Area. Other additions to the Focus Area could include Sir Charles Hamilton Sound on the northeast coast of Newfoundland and areas in the Jeanne d'Arc Basin containing producing offshore oil and gas facilities. The first two of these areas have nearshore ocean water depths that are sufficiently shallow (< 50 m) to permit fixed offshore wind turbines, iceberg sightings that are rare, mean wind speeds above 8 m/s at 80 m hub heights, and adjacent onshore areas that are accessible by road permitting siting of fabrication facilities and laydown areas. Inclusion within the Focus Area of an additional area within the Jeanne d'Arc Basin would allow the Regional Assessment to explore the potential to utilize offshore wind generation to offset fossil fuel energy and associated greenhouse gas emissions. These proposed additions to the Focus Area are discussed in greater detail in the attached comments.

Should you have any questions or require clarification respecting these comments on the Proposed Focus Area, please contact Paula Reid at the Innu Nation Environment office ([paulareid@innu.ca](mailto:paulareid@innu.ca)) or Rick Hendriks ([rmhendriks@cameradoenergy.com](mailto:rmhendriks@cameradoenergy.com)).

Nin,

<Original signed by>

*for*

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Att.: Regional Assessment of Offshore Wind Development in Newfoundland and Labrador:  
Proposed Focus Area – Innu Nation Comments