



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

On behalf of the Indian Head First Nation Band (IHFN), we are writing to express our concern with the Regional Assessment of Offshore Wind Development in Newfoundland and Labrador, and the MOU between Canada and the Province of NL for offshore turbines in designated bays (OREs).

The Committee has failed to meaningfully engage with and incorporate the Indigenous knowledge and perspectives of the Indian Head Band throughout this process. This oversight demonstrates a lack of consideration for the community's inherent rights and interests as an Indigenous people, in violation of the principles of the UN Declaration on the Rights of Indigenous Peoples and the Newfoundland and Labrador Aboriginal Consultation Policy. The last minute inclusion (July 2024), the rushed timeline (August 21, 2024) and the broad geographic scope of the Regional Assessment have made it extremely challenging for the community to participate and share our knowledge. Our Vice Chief attended the committee's last meeting in early summer (June), provided his business card representing Indian Head First Nation and asked for a meeting and appropriate consultation. He was never contacted and thus either was IHFN membership or elected leaders in a timely fashion.

In light of these grave concerns, we call on Canada and the Committee to:

- Immediately remove the Bay St. George region from consideration in any focus area for offshore wind development
- Amend the MOU signed December 2023 with the Province to remove Bay St. George and IHFN from defined OREs
- Engage in meaningful, nation-to-nation consultation with the Indian Head First Nation Band to fully understand the impacts of offshore wind development on our rights, interests, traditional practices, and to incorporate our Indigenous knowledge into your assessment
- Provide sufficient capacity for the Indian Head First Nation Band can fully participate in the process

At this juncture, excluding this region from your recommendations would be an important step towards upholding the principles of the UN Declaration on the Rights of Indigenous Peoples, to which Canada is a signatory.

The Indian Head First Nations Band traditional territory includes all communities between Gaudon's bridge in Kippens to Gallants inland and Barchoix Brook and a portion of Bay St George's water ways. As Mi'kmaq nation our people have deep ancestral ties to the lands and waters of the Bay St. George region. This area is of critical importance to our people, supporting our commercial, ceremonial and communal fishing activities that are central to our culture, food security and livelihoods.

Bay St. George is home to important fish spawning grounds, Migration routes, sensitive benthic habitats, and areas of high ecological significance. Beyond the direct impacts on our fisheries, we are also deeply worried about the broader environmental and cultural impacts that offshore wind development could have in this region. The views from our coastal communities are also of immense cultural value, as they have shaped our connection to this land for generations. Industrialization of these waters through offshore wind would irrevocably alter the natural and cultural landscapes that are the foundation of our way of life, and our ability to transfer indigenous knowledge.

We acknowledge that we do not have capacity or current data on hazards and vulnerabilities of a project of offshore wind development. However, environment and socio-economic impacts within our territory cannot be underestimated. We are compiling the key concerns of our band members and will require time to do so. Once collected, we trust that you will ensure further review, interpretation, mitigation, implementation and assurance.

Going forward, we expect the federal and provincial governments to develop a regulatory framework for offshore wind that prioritizes the meaningful participation and consent of affected Indigenous communities like ours. We welcome the opportunity to work with you as partners in shaping this framework and any future decisions regarding the use of our traditional territory.

We look forward to your response and to continued dialogue on this critical issue.

Sincerely,

A handwritten signature in cursive script that reads "Byron Alexander".

Byron Alexander
Chief, Indian Head First Nation
Interim President of The Federation of Newfoundland Indians