



December 09, 2024

## ELECTRONIC MAIL

**To** - The Committee for the Regional Assessment of Offshore Wind Development in Newfoundland and Labrador, Impact Assessment Agency of Canada

**Subject:** Response to the request for review of draft report by the Committee for the Regional Assessment of Offshore Wind Development (OSW) in Newfoundland and Labrador

On 1 October 2024, the Department of National Defence (DND) received a request from the Committee for the Regional Assessment of Offshore Wind Development in Newfoundland and Labrador (the Committee) to provide comments on the draft Regional Assessment Report for Offshore Wind Development in Newfoundland and Labrador. DND has reviewed the report and provides feedback below.

The Royal Canadian Navy (RCN) relies on Maritime Local Operating Areas (MARLOAs) in the Atlantic Ocean to conduct military training, to fulfill their departmental mandate. Location coordinates of the MARLOAs can be found on [Annual Notices to Mariners \(notmar.gc.ca\)](https://notmar.gc.ca). Activities that occur in these areas include:

- Weapons testing, operational testing and evaluation (ship certification) and gunnery (crew certification),
- Restricted underwater activities; and
- Military restricted air operations.

From the draft report, page 92, Maritime Forces Atlantic Safety & Environment (MARLSE) suggests the following modifications, highlighted in yellow:

*“The Royal Canadian Navy (RCN) and Air Force (RCAF) both may conduct practice exercises and undertake planned military activities along Canada’s coasts, including within the Focus Area. Activities may involve ships, submarines, aircraft, or other components. Canada’s Department of National Defence (DND) has designated areas in the Focus Area for exercises that involve only both surface and sub-surface activities, and including those that may be have the potential for live firing. exercises in the Focus Area. and Exercises may result in the deposition of unexploded ordnance (UXO) (e.g. bombs, grenades, artillery shells, flares, mortars, and hazardous residues resulting from partial or failed detonation) in various locations.”*



*There are currently no known **historic** UXO sites located in or around the Focus Area (comment: The NL Advisory Committee has not confirmed this statement with the DND UXO and Legacy Sites Program). Expert authorities did not provide the Committee advice on avoiding military use sites or UXO sites when identifying offshore wind licencing areas. Engagement did not result in any feedback specific to avoiding **ing** military use sites or **historic** UXO sites when identifying offshore wind development licencing areas.*

~~*While the Committee is aware of the broad areas determined for DND firing practice and exercise areas, there is currently no public dataset of georeferenced historic UXO sites. Some of these exercises have also resulted in the deposition of UXO in various locations. These are military explosives that did not explode or function as intended, which can include bombs, grenades, artillery shells, flares, mortars, and hazardous residues resulting from partial or failed detonation (DND, 2021). There are currently no known UXO sites located in or around the Focus Area''*~~

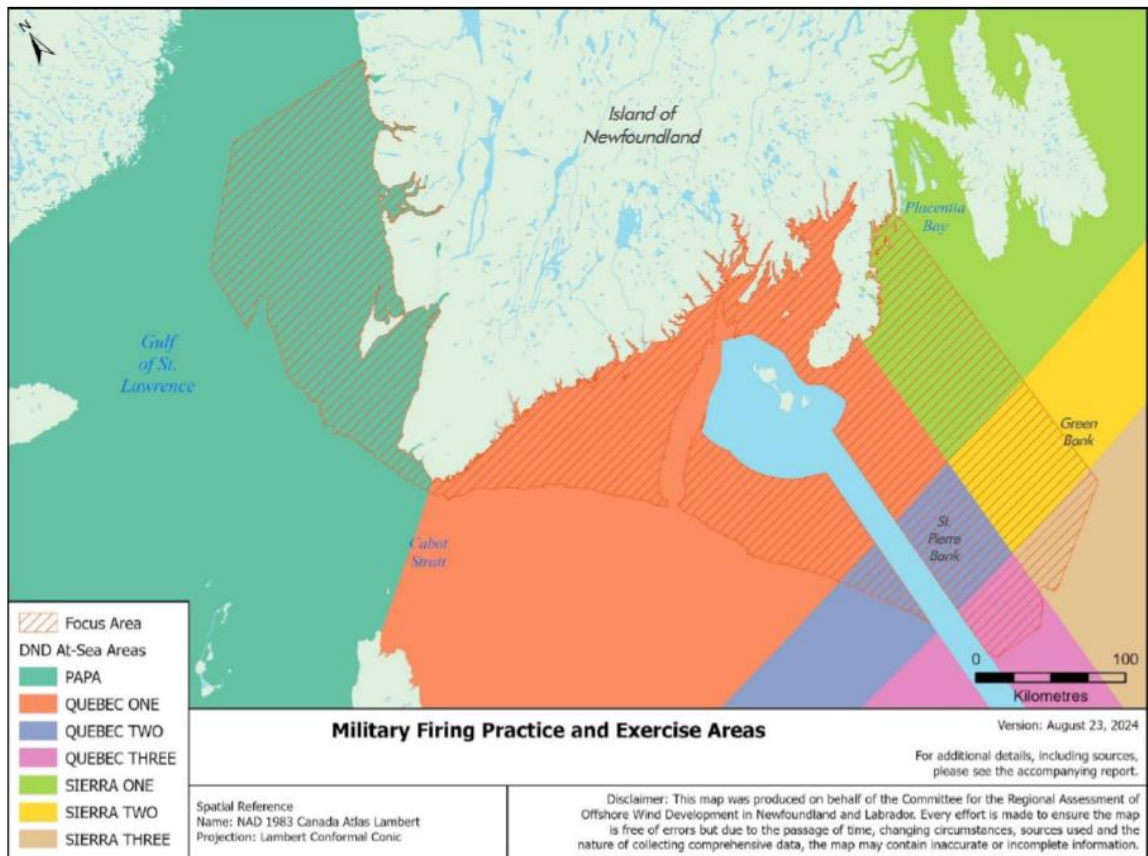
DND advised the committee to contact the DND UXO and Legacy Sites Program for updated information on presence of any potential UXO sites in the focus area. The DND UXO and Legacy Sites Program can be contacted at [UXOCanada@forces.gc.ca](mailto:UXOCanada@forces.gc.ca)

As outlined in figure 7.8.5 of the Regional Assessment of Offshore Wind Development in Newfoundland and Labrador draft report, the focus area seems to overlap with MARLOAs Quebec (Q) 1-3, and Sierra (S) 1-3.

National Defence policies *Strong, Secure, Engaged* and *Our North, Strong and Free* highlight the importance of sufficient equipment, personnel trained in using that equipment and infrastructure including vessels and aircraft for the purpose of allowing the Canadian Armed Forces (CAF) to detect, deter and defeat threats in, over and approaching Canada via air, land, or sea.

Development of OSW infrastructure within the MARLOAs would limit the RCN ability to train personnel and test new vessels and equipment to prepare ships to execute the RCNs core mandate which is to protect Canadian sovereignty and interests at sea, at home and abroad. This negative impact spans all the phases of the project.

Figure 7.8.5. Military Use Sites within or adjacent to the Focus Area



Map depicting military firing practice and exercise areas within and adjacent to the Focus Area.  
Source: (DND, 2023)

Please consider this submission as the official RCN response to be used for any official purposes.

We look forward to continuing to support the Committee throughout the Regional Assessment process. I would ask that you please continue to use MARL SE as a first point of contact, and we will endeavor to provide you a unified response.

Sincerely,

//OSB//

Carol Lee Giffin  
MARLANT Safety and Environmental Officer