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Fish, Food & Allied Workers

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Regional Assessment of Offshore Wind Development in Newfoundland and Labrador
Impact Assessment Agency of Canada
301-10 Barbers Hill, St. John's NL, A1C 3M1

RE: Draft Report – Regional Assessment of Offshore Wind Development in NL Public Comment Opportunity

Regional Assessment Committee members,

On behalf of the Fish, Food and Allied Workers' Union (FFAW-Unifor), please accept the following comments in response to the Draft Report on offshore wind development in Newfoundland and Labrador. FFAW-Unifor represents every inshore fish harvester south of Makkovic encompassing over 3,000 owner-operator enterprises and their 7,000 crew members. Our membership also includes 4,000 working people in fish processing plants, marine transportation, metal fabrication, brewing, hospitality, and more.

As the Union representing fish harvesters and processing workers, FFAW-Unifor is the primary advocate for the economic and social sustainability of coastal communities throughout the province of Newfoundland and Labrador. The coastal fabric of our province is dependent on healthy oceans and fish stocks.

The inshore fishery in Newfoundland and Labrador contributes over \$1 billion annually to the provincial economy from a renewable and historically significant marine resource. Offshore wind energy expansion has a direct impact on fish harvesters who will be faced with increased competition for ocean space during development and with permanent infrastructure installations. Co-location and co-existence of the existing commercial fishery and new offshore wind energy represents a major, unanswered concern for the Newfoundland and Labrador fishing industry.

FFAW membership has been thoroughly engaged in the ongoing Regional Assessment for Offshore Wind in Newfoundland and Labrador. Engagement from both FFAW staff and fish harvesters has been immense, reflective of the magnitude of potential impacts and indicative of a desire to be genuinely consulted as the primary ocean stakeholder throughout the process.

The fishing industry must be consulted in the earliest phases of offshore wind to increase trust and understanding and to ensure all avoidance mitigations can proceed. The fishing industry will be the significantly and permanently disrupted, and the future succession of the industry relies on sustainable practices that preserve biodiversity and sensitive habitat conditions. Destabilization of this habitat, which is often irreversible, will directly cause the displacement of valuable fisheries. Governments must ensure they support locally relevant research initiatives **ahead** of any installations and thoughtfully and meaningfully consider fisheries as a priority.

Newfoundland and Labrador is unique in many ways, perhaps the most prolific being our geography as an island. Our rural, coastal communities have relied on fish harvesting to provide sustenance and economic stability since colonization and European immigration, and still provides the economic backbone to this day. Insights and experiential knowledge provided by fish harvesters will serve as an invaluable resource throughout the planning process to mitigate risk and to ensure sound implementation. It is reckless and irresponsible to jeopardize this rural reliance given the vast uncertainty of potential negative effects. FFAW members in small, coastal communities will be disproportionately and negatively affected if their fishing grounds are displaced by offshore wind developments, as well as impacting the value of financial investments made by enterprise owners.

FFAW-Unifor is emphasizing the need for site specific Environmental Assessments. The fishing industry is unique in that spawning grounds, reproductive areas and productive fishing grounds change season to season, species to species, and with considerations to climate change, this variability is increasing exponentially. Site specific assessments will help fill the fishing data gaps in the RA Committee data, which FFAW and other fishing industry groups have emphasized since this RA process began. DFO fisheries data included is already outdated.

FFAW appreciates the acknowledgement that a lack of fishing data due to privacy does not indicate the absence of fishing activity. Project level assessments at every part of offshore wind development can ensure necessary, continued engagement with fisheries stakeholders. The CCRI data included is considered insufficient. While traditional and local ecological data is invaluable, the larger, macro-level historical footprint is still missing.

From a fisheries perspective, there have not been significant changes to the RA Report since initial decision-making and publishing of the interim report. There is no ROV survey data included, no FFAW science reports, particularly the longstanding 3Ps halibut longline survey which takes place within the Focus Area.

The fisheries engagement process in Nova Scotia when compared to that of Newfoundland and Labrador is starkly different. The RA Committee in NS met frequently and in-person, many times throughout the RA process. FFAW has previously expressed its dissatisfaction with the manner in which Advisory Groups have been utilized throughout this Regional Assessment. Our members are unsatisfied with ineffective consultations and engagement processes and take issue with names being published in reports that have, in reality, contributed nothing or little to advisory proceedings.

While we understand the need for screening to ensure relevant feedback and expertise, the lack of overall engagement and the perceived usefulness of these groups is problematic and concerning to our members, particularly given the public perception attached to the meeting reports. The Regional Assessment Committee has published the names of our members in various reports and

findings even though they have been unable to attend any of the meetings, creating a sense of deception among our membership.

It is not clear to what degree, if at all, the RA Committee has engaged Provincial and Federal governments. This is particularly concerning when we consider the convoluted jurisdictional boundaries and how they will be managed and regulated. Further, government entities in NS are meeting frequently. Policy documents with intent are being drafted in NS now. Regular meetings are occurring, and compensation plans for the fishing industry are moving forward. This is gravely concerning as it will be expected that the NL government will mirror this legislation, likely without due consideration or engagement with the local fishing industry. **Our government must take a similar approach to that of NS. Anything less is a dereliction of duty.**

A significant gap that cannot be understated is the lack of a common forum for offshore wind and fishing industry engagements to occur. This outstanding gap is massive and the longer it goes unfilled, the more devastating the potential impacts to fish harvesters will be. Organizations without mandates for offshore wind development are working to fill these gaps in a piecemeal effort and this does not appropriately serve the fishing industry.

FFAW emphasizes avoidance protocols must be prioritized should offshore wind developments proceed. Only when absolutely all efforts to avoid fishing activity have been exhausted should mitigations be considered. These mitigations must include enhanced consultations with the fishing industry. Compensation, however, must only be considered when all mitigative measures have been exhausted in agreement with the fishing industry. Early and continued engagement with the fishing industry is imperative. This, coupled with site specific assessments underpin the success of robust compensation plans. Fish harvesters must be assured they will receive the same economic benefits they have historically achieved.

Lastly, FFAW acknowledges this is a robust report. The extensive work done by the RA Committee is appreciated. The work required by the committee, in such a short period of time, was undoubtedly challenging. This report is a good start in forming the basis of what may be required for future offshore wind energy projects, but there is significant work to be done on the micro-level scale for the fishing industry.

We look forward to discussing ways to make potential offshore wind engagement processes more meaningful for fisheries stakeholders. As a key player, FFAW-Unifor is committed to all consultation that will be required moving forward in support of a just transition to greener, less fossil fuel dependent technologies. Our Union, however, reaffirms the growth of one industry **cannot** be at the expense of another.

Kind regards,
<Original signed by>

Dwan Street
President