

Draft Regional Assessment of Offshore Wind Development in Newfoundland and Labrador Report Feedback

Draft Regional Assessment of Offshore Wind Development in Newfoundland and Labrador Report Feedback

Section	Page #	Comment
1.5.2	16	Focus Area includes waters and adjacent land of cultural significance to QFN & other Mi'kmaq groups
5.2	60-61	Perhaps one of the most important points given in the feedback was that any proposed project inside or outside of the focus area is not excluded from future impact assessments. This is important because environmental conditions can change between now and future project proposals especially with climate change warming waters causing species to migrate further north (i.e. American lobster). The northern migration of species could affect fishery areas which could clash with potential offshore wind development. To alleviate any concerns there should always be a thorough environmental impact assessment done regarding offshore wind development in this province and support for a precautionary approach to the industry has been outlined within the report.
7.1.1	125	QFN would like to reiterate that the Focus Area is adjacent to our traditional territory and as we are a landless band any offshore wind development would be taking place on unceded Mi'kmaq territory.
7.1.3	128	QFN supports the movement for Indigenous consultation regarding offshore wind development in NL. Mentioned in the report is the UNDRIP which commits developers to meaningful engagement and consultation, and obtaining the free, prior, and informed consent of indigenous peoples. QFN supports the "do no harm" principle outlined in the report. QFN also appreciates that eagle mortalities due to offshore wind should they arise be respect and carcass given to a representative of an appropriate Traditional Chief where the carcass was found.
7.3.6	229-230	QFN agrees with the data gaps outlined in this section and the need for more research on the impact of offshore wind developments on Aerofauna.
7.3.7	230-231	QFN supports the committee's conclusions regarding aerofauna as there is only a better understanding to gain from conducting additional research using both traditional knowledge and western science.

Draft Regional Assessment of Offshore Wind Development in Newfoundland and Labrador Report Feedback

- 7.4 General There is a catalogue of fish that frequent the Focus Area, many of which are facing endangerment such as Atlantic cod, deepwater redfish, Atlantic wolffish and bluefin tuna. Also among these species are culturally significant species to Mi'kmaq people such as American eel and Atlantic salmon. If any wind developer was to propose windmills within habitat of critical and cultural species there would need to be more research done on the populations of these species.
- 7.4.4 352 QFN stands by their statement in the report about American lobster being a species that supports a culturally significant fishery and our concerns during the construction phase which could have negative impacts on their habitat. Should offshore wind development take place, American lobster habitat impacts must be considered with the utmost seriousness.
- 7.4.6 356-357 QFN supports the recommendations from the committee regarding marine fish and their habitat.
- 7.5.6 434 The recommendations given by the committee to address data gaps in this chapter are a welcome sight. Given the status of many of the marine mammals frequenting the Focus Area these recommendations support the survival of these species while contributing to a precautionary approach to offshore wind.
- 7.6.1.7 469 QFN appreciates the mention of the ongoing South Coast Fjords National Marine Conservation Area project as this could ultimately shape how many industries including offshore wind develop on the south coast.
- 7.6.6 499 The committee conclusions and recommendations regarding protected and special areas should be followed whenever developers are thinking of starting offshore wind production. As a small aside it is also important that more research be conducted on how offshore wind farms can sometimes create unintentional protected areas as human activities are often banned or severely limited within these areas allowing for marine life to settle on tower foundations undisturbed from further human intrusion.

Draft Regional Assessment of Offshore Wind Development in Newfoundland and Labrador Report Feedback

7.7 General The fishing industry is one of both cultural and economic significance to the people of Newfoundland and Labrador and to Mi'kmaq people of the province. To avoid conflict with both large commercial and small recreational fishers would be paramount to any offshore wind project. QFN agrees with much of the recommendations outlined by the committee in the report but would add the consultation of small local fishers as an important cornerstone in the development process. Offshore wind has the potential to change routes to and from recreational fishing grounds if not alter fishing areas all together. It would be important to get the recreational and traditional fishers input to avoid conflict where possible.

12 827-828 All in all, the Draft Regional Assessment Report of Offshore Wind Development in Newfoundland and Labrador provides a multitude of information for offshore wind project developers. It importantly provides Indigenous groups that should be consulted on the island of Newfoundland should any projects for offshore wind seriously be developed here. The ecological, biological and environmental information given in this report sets a high standard for what similar reports should look like, and few stones are left unturned. However, it is important to reiterate that from an environmental standpoint while this report would do wonders for any developer to give context to the Focus Area it should not substitute actual “boots on the ground” consultation or research.

This document should be used alongside environmental research in areas of proposed offshore wind sites to help fill data gaps outlined within the report. Only through this process can be apply a precautionary approach to this industry in our province, as it even states in the report that our nation has no experience in the industry. We would like to thank the committee for including QFN into their document allowing us to input our knowledge based on traditional sources as well as western science. We are hopeful on how a document like this can inform developers and look forward to sharing our knowledge again when the time comes.