

May 2, 2023

To: Hon Steven Guilbeault,
Minister of Environment and Climate Change
Gatineau, QC, K1A 0H3

and

Impact Assessment Agency of Canada
Ottawa, ON, K1A 0H3

Re: Designation of Project "Nujio'qonik" GH2 for full federal Impact Assessment

Dear Minister Guilbeault,

We are writing as the Council of Canadians Avalon (NL) Chapter, to support the Request for Designation you have received from the Environmental Transparency Committee and others on the Port au Port Peninsula on Newfoundland's west coast. We strongly support their request for a full Impact Assessment of the proposed Project "Nujio'qonik" GH2, which threatens to irrevocably damage their homeland, and which, whatever the outcome, will be precedent-setting.

As citizens of Canada and of Newfoundland and Labrador, we are deeply alarmed by the threats this proposal poses to the vulnerable environment of the Peninsula, and to the Indigenous and non-Indigenous people of the small local communities directly affected. Their position is like that of the canaries in the coal mine – warning us about dangers that we might not otherwise immediately perceive ourselves.

In their formal Request for Designation, the people of those affected communities have described in documented detail the potential impacts of this proposed wind-to-hydrogen project. In its first phase, 164 giant offshore-type wind turbines would be crammed onto this small and fragile arrow of land, roughly 1/30th the size of the Greater Toronto Area. From our research into this matter, we have every reason to believe that erecting and maintaining those turbines and their accompanying infrastructure would inflict irreversible damage on the environment and on the sustainable way of life of the people – many of them Mi'kmaq and many also of French ancestry.

Our immediate concern is for those people and for "all our relations," including the unique Species at Risk whose only home is the Peninsula. At a broader level, we are alarmed by the shockingly high-handed and undemocratic way the proponent and governments at all three levels have been moving the project forward behind closed doors and without any meaningful dialogue with those most affected. Our concern in this regard is for Canadian democracy, and for the path our society must choose if we are to survive climate change and the other imminent threats to us and to the planet.

To briefly summarize, then, we fully and urgently support this Request for Designation from the people of the Peninsula, for the reasons they have detailed:

a) *Project "Nujio'qonik" is a new and unique type and scale of project which has not been considered before, and is not included in the Project List. It has not been subject to the rigorous and comprehensive impact assessment that such a massive and untried endeavour demands. How it is handled could set a precedent for many future wind*

power projects, for which the Province has already set aside 16,600 square kilometers of public land. If there is to be a just transition to a net-zero economy, such projects must be based on full and proper impact assessment.

b) *The Project's implementation would have multiple harmful impacts on the Indigenous people of the Port au Port Peninsula and would irreversibly destroy their way of life.*

c) *The Project would inevitably have adverse impacts in important areas of federal jurisdiction, including Species at Risk, Migratory Birds, and fish habitat.*

d) *Project "Nujio'qonik" is a blatant case of project-splitting, with the process leaving unexamined the essential second and third phases of the proponent's integrated 3-phase plan. Not only is project splitting morally and politically unjustifiable, it is illegal under both federal and provincial legislation, and the proponent and the Provincial government must not be allowed to proceed with it.*

e) *Public concern is rising daily about the above issues – the untried nature of the project and its gigantic size, the devastating impacts on local Indigenous people, the multiple threats to the environment, and the shameful machinations – including the project-splitting – undertaken by both proponent and governments in their efforts to get the whole thing implemented.*

As citizens who live elsewhere in the Province and are not directly impacted by activities on the Port au Port Peninsula, we want to draw particular attention to this last set of issues, which do directly affect us. We highlight three aspects of the Project's significance, all of which are ongoing, and all of which reinforce the need for a full federal Impact Assessment:

- the structured lack of transparency surrounding the whole Project,
- the deceptive "spin" being used to "sell" it, and
- its biased promotion at top political levels.

Early on, this combination of secrecy, spin and high-level optimism bias succeeded in misleading many members of the public into thinking of Project "Nujio'qonik" as an admirable part of the fight against climate change, a progressive move to replace fossil fuels with "green" energy, using our Province's natural gift of wind. When the news burst on us in August 2022, this gross misconception slowed the growth of public awareness and opposition.

Now, however, thanks to the courage and hard work of a few concerned citizens on the Peninsula and beyond, more and more of us are realizing the striking contrast between the portrayal of the project by World Energy GH2 and government leaders, on the one hand, and the reality on the ground, detailed in the Request for Designation. Contrary to the promotional hype, Project "Nujio'qonik" is not Nature's gift to Newfoundlanders and Labradorians. It is a billionaire-level scheme to exploit the rising anxiety over climate change for purposes of private profit.

Project "Nujio'qonik" is also not "green". Its construction and operation will use large amounts of fossil fuels and will generate its own emissions while wreaking havoc with the local environment and human communities. The end product will not be for use here in the Province or even in Canada; it will be shipped overseas, generating more emissions in transport. Given the serious doubts already surfacing about the economics of the hydrogen industry, and the uncertainties and risks inherent in the global marketplace, the result a decade or so from now

may well be a monumental "stranded asset" – 164 giant turbines decaying dangerously on a dead peninsula that was once home to communities of humans and a wealth of biodiversity.

The proponent has been asked to complete an Environmental Impact Statement (EIS) for the provincial Environmental Assessment process. However, we are doubtful about the ability of that process to properly address the magnitude and complexity of the issues involved in Project "Nujio'qonik." Given the enthusiastic verbal and institutional support that the provincial government has given this project from the start, it is difficult to imagine that the assessment process would be entirely free of pro-project bias. In fact, the work is already steam-rolling ahead in the absence of any approval and before the proponent's EIS has even been submitted.

Moreover, the Province offers no intervenor funding for participants in its assessment process, not even to people directly affected by a proposed activity. Even if that process were adequate and unbiased, it would be impossible, in practical terms, for the people most directly affected – those in the small rural communities on the Port au Port Peninsula – to contest the Project and the secretive preparatory work already under way on it.

The local people who are making this Request for Designation have very little in the way of resources, and without intervenor funding, there would be no way for them to intervene effectively in any impact assessment process. In fact, they have been severely stretched just to be able to complete, with some pro bono assistance, the demanding requirements that the Impact Assessment Act sets out for those Requests. For them to have meaningful input on an impact assessment of this Project, their only chance is to have it designated, after which they can apply for intervenor status and potential funding.

In conclusion, we urge you, Mr. Minister, to agree to the request by the Environmental Transparency Committee and their neighbours on the Port au Port Peninsula, to designate Project "Nujio'qonik" for a full Impact Assessment under the Impact Assessment Act. This project is exceptional in its nature, scale and implications, and it is essential to ensure that such proposals strengthen, instead of undermining, Canada's commitments on climate change, biodiversity and reconciliation.

Sincerely,

Helen Forsey

Roberta Benefiel

Barry Darby

Yvonne Earle

John Jacobs

Yvonne Jacobs

for Council of Canadians, Avalon (NL) Chapter