



Social Justice Co-operative of Newfoundland and Labrador  
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July 20, 2023

Hon. Steven Guilbeault (Steven.Guilbert@parl.gc.ca)  
Minister of Environment and Climate Change  
200 Sacre-Coeur Boulevard  
Gatineau, QC, K1A 0H3

and

Impact Assessment Agency of Canada  
Atlantic Region ([atlanticregion-regiondelatlantique@iaac-aeic.gc.ca](mailto:atlanticregion-regiondelatlantique@iaac-aeic.gc.ca))  
301-10 Barter's Hill, St. John's, NL, A1C 6M1  
Headquarters 22<sup>nd</sup> Floor, 160 Elgin Street  
Ottawa, ON, K1A 0H3

Dear Minister Guilbeault,

**Re: Request for Designation under the *Impact Assessment Act (IAA)* with respect to the Port au Port Wind Power and Hydrogen Generation Project (Nujio'qonik GH2; World Energy GH2) Newfoundland and Labrador, submitted by the Environmental Transparency Committee (ETC) of the Port au Port Peninsula, NL.** The project has been registered for the provincial Environmental Assessment process, Project # 2202.

The Social Justice Co-operative NL (SJCNL) agrees that the above named activity should indeed require a federal Impact Assessment under the *Impact Assessment Act* and fully supports the local Environmental Transparency Committee (ETC) in its request for expedited designation as such.

The Social Justice Co-operative NL (SJC) is a volunteer-led, member-owned, non-profit co-operative working to address issues of social, economic, and political inequality. Our vision is to reclaim care as a mechanism for building a just society, which includes an end to patriarchy, white supremacy, colonialism, imperialism, climate change, and our corrupt capitalist system. Our volunteers work within community as educators who speak to the structural causes of social injustice, as citizens who initiate and support social justice campaigns, and as partners who collaborate with other groups to achieve common social justice goals.

We fundamentally accept, respect, and affirm the right of local and Indigenous communities to make important -- indeed, transformative -- decisions about their environment, as well as their right to make such decisions having access to full and transparent processes and clear, comprehensible information. This has not, however, been the case with this proposal and the project, now registered with

the provincial government, is fast-tracked to the point that it risks being “substantially begun” before being assessed.

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,

Patricia Johnson-Castle  
Kerri Neil  
Mary Feltham  
Vanessa Quinn  
Kassie Drodge  
Renee Dumaresque  
- Directors, SJCNL