

Enviro Watch NL
PO Box 2021, Station C
St. John's, NL A1C 5L7
Telephone 709-746-3700

April 27, 2023

Hon. Steven Guilbeault
Minister of Environment and Climate Change
200 Sacre-Coeur Boulevard
Gatineau, QC K1A 0H3

Re: Request for Designation of the Port au Port Wind Power and Hydrogen Generation Project under the Impact Assessment Act

Dear Minister:

I am writing in support of the request from the Environmental Transparency Committee that you order a complete impact assessment under the Impact Assessment Act for the wind energy project proposed for the southwestern part of the island of Newfoundland.

By way of background, Enviro Watch NL is a recently formed non-government organization of people and others from across the province of Newfoundland and Labrador, including Indigenous people, who care deeply about the current pace of natural resource development and the serious lack of political transparency and public consultation. Never before in the history of the province have so many disparate projects (not only wind energy but mining, aquaculture and hydroelectric development) been proposed, or are under construction or actually in operation.

We are especially concerned about the mega-scale wind energy/ hydrogen/ ammonia project proposed by World Energy GH2 for the Port au Port Peninsula for the reasons set out in the letter to you from the ETC. We support and adopt their submissions and express our gratitude for the many hours of volunteer time invested by ETC members in raising issues of fundamental importance that have received far less attention than they deserve.

We reiterate some of the concerns raised by the ETC:

1. World Energy GH2 is engaging in project splitting, thereby avoiding a true accounting of the total cumulative affect of its project;
2. As even World Energy GH2 acknowledges, the construction area is home to vulnerable bird and animal species.
3. At this time, green hydrogen technology is untested on this scale, both in its economic viability and in its risks. We share the concerns of the ETC about the impact on humans and land and water of a catastrophic event such as a hydrogen leak. It is crucial that the precautionary principle be applied.
4. The land on which 164 wind turbines of more than 600 feet in height (designed for offshore use) would be built is of historical significance to Mi'kmaq in Newfoundland. Most of the people who live on the land where the turbines would be built are Mi'kmaq. The several Indigenous organizations that have accepted financial contributions from World Energy GH2 do not represent Mi'kmaq in the affected area, the vast majority of whom are opposed. This project would profoundly alter their homeland forever;
5. A project of this magnitude must be accompanied by meaningful public participation, including from Indigenous people, that only the federal Impact Assessment Act can provide. The provincial act has no provision for participant funding. It is untenable that citizens should be left with no financial resources while a well-funded proponent strategically navigates the approval process to an inevitable conclusion.

We agree with the ETC that you should order a federal assessment. We also agree that you must, that you have a legal obligation to do so, because so many triggering factors are present in this project proposal -- project splitting, impact on oceans and migratory birds, impact on Indigenous peoples, among others.

Minister Guilbeault, we thank you in advance for the thoughtful consideration that we are confident you will provide to this matter, and look forward to your response.

ENVIRO WATCH NL

<Original signed by>

Glenn Wheeler

Co-Chair

C: Environmental Transparency Committee

Impact Assessment Agency of Canada