

Hon. Steven Guilbeault
Minister of Environment and Climate Change Canada
House of Commons
Ottawa, ON K1A 0A6
Sent via email to Steven.Guilbeault@parl.gc.ca

20July2023

Dear Minister Guilbeault,

I am writing on behalf of the Council of Canadians to support the Request for Designation from the Environmental Transparency Committee (ETC) for the proposed Project Nujio'qonik GH2 on the Port au Port Peninsula of NL. Our organization overwhelmingly supports renewable energy development, and we know that development needs to be done with people and communities' interests put first. We understand that the vast majority of people in the communities on and around Port au Port, most of whom are Indigenous, do not support this project as it stands because of the negative impact it poses to the ecosystems and communities on the peninsula. As such, we think it is critical that Nujio'qonik undergo a federal assessment to ensure that it meets the high bar set by Environment and Climate Change Canada.

The Council of Canadians recognizes that wind power is one of the most affordable and reliable renewable energy solutions with which we can address the climate crisis. As we build renewable energy production in Canada, projects that are community-led and -supported, and/or developed and run by the public sector must be the standard. Nujio'qonik is a pet project of billionaires and is likely to be plagued by the same suite of problems that tend to arise with privatized infrastructure, including delays, less job creation than with public projects, excessive cost overruns and corporate profiteering, absence of accountability and transparency, and negative social, economic, and environmental impacts.

The Nujio'qonik project proposes to use wind generation to create hydrogen and ammonia. The climate crisis requires us to make significant moves towards renewable energy sources, but using renewable power like wind to produce hydrogen is highly inefficient. Depending on the end-use of green hydrogen, electricity generation requirements can be **2 to 14 times higher** than direct electrification solutions for the same effect.

The ETC's detailed 29-page Request for Designation, formally submitted to you on April 18, 2023, supplied extensive references and documentation showing that Project Nujio'qonik would not meet the necessary standards to be considered "green." Their Request cited the project's expected impacts on the vulnerable environment of the Peninsula, and the harm it would cause to the Indigenous and non-Indigenous peoples of the unique rural area. The proposed 164 giant offshore-type wind turbines squeezed onto this small and ecologically



fragile land area could threaten both human communities and livelihoods, and local ecosystems, including migratory birds and species at risk, and these risks require robust evaluation.

It is essential for all three levels of government to support and respect transparency, democracy, and genuine public involvement as we build our renewable energy generation capacity and transition towards a zero-carbon future. In the past and present, it has been all too common for privatized infrastructure projects like this one to bypass robust processes of evaluation and consideration of the public good. It's time for your government to commit to really considering the needs of people and the planet before the wants of private corporations, and to start doing so by evaluating all major energy projects like this one through federal impact assessments.

Moving ahead with this project without a full Impact Assessment, risks undermining public confidence in and community support for wind projects in general. This in turn risks undermining our collective climate goals and the need to significantly scale up renewable energy, including wind, in transparent and responsible ways.

The Council of Canadians urges you, Minister Guilbeault, to seriously consider the detailed concerns outlined in the ETC's request as well as the May 2 letter of support from the Avalon (NL) Chapter of the Council, and to immediately designate Project Nujio'qonik GH2 for a full Impact Assessment under the Impact Assessment Act.

Sincerely,

<Original signed by>

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and

Angela Giles and Chris Kruszewski
Atlantic Regional Organizer and Climate Justice Campaigner
for The Council of Canadians

