

October 23, 2024

ELECTONIC MAIL

To: Andrew Parsons, Minister of Industry, Energy and Technology, Government of Newfoundland and Labrador

Subject: RE: Response to March 2024 Offshore Wind Regional Assessment Interim Report

Dear Minister Parsons,

We thank you for your response to our Interim Report, posted March 2024. We also extend our thanks to all Government of Newfoundland and Labrador departments which aided in giving information to the Committee in response to their Request for Advice #2. We hope the following response will clarify the questions and concerns you outlined in your letter. We will be making reference to our recently released [Draft Regional Assessment Report](#), as that contains the most recent information and justifications to your questions.

In relation to the proposed 10km buffer, this was developed as a starting point during the licencing stage to alleviate various impacts of offshore wind to components identified in the coastal and near shore areas within the Focus Area. This is a similar approach to addressing buffers as utilized in other jurisdictions. This buffer attempts to address potential effects to the following constraints:

- Important areas for birds.
- Key Biodiversity Areas.
- Coastal ferry routes.
- Marine Refuge or Fisheries Closures.
- Coastal fisheries, such as lobster fisheries.
- Aquaculture Sites and Licenses.
- Airports and Marine Aerodromes.
- Provincially protected areas.
- Community and Cottage Viewscapes & Soundscapes.
- Tourism.

Additional background information and justification on the coastal buffer can be found in Section 6.3.3 of the [Draft Regional Assessment Report](#).

Regarding removing areas with potential conflict, we have taken a precautionary approach in conducting our analysis and making these recommendations of licencing areas. We have also previously stated that this method is the best approach to complete our mandate within this Regional Assessment. We are of the viewpoint that as projects are

initiated in the Offshore Wind Licencing Areas, further studies on this industry's impacts on components will be conducted, presumably resulting in enhancement of information dealing with the data gaps identified in the Regional Assessment. This could then potentially lead to additional licencing areas being opened by regulatory bodies. We have also included a mitigation hierarchy within the [Draft Regional Assessment Report](#) (Section 7), where we outline that the first two steps of the hierarchy are to avoid and to minimize impacts. While we have applied the method of avoidance, to the best of our abilities, by eliminating as many areas as possible with these potential conflicts, we also understand that total avoidance in some areas may not be feasible. Additional mitigation measures are outlined in each respective component of the [Draft Regional Assessment Report](#). Verification of the effectiveness of mitigation methods within the Newfoundland and Labrador marine environment will be important in the early offshore wind projects. Additionally, while ranking the suitability of each Recommended Offshore Wind Licencing Area would be ideal, we currently do not have enough specific information to conduct this exercise, therefore we have classified our Recommended Offshore Wind Licencing Areas by depth, to show the feasibility of areas based on the depth limitations of current and future technologies. We are of the understanding that other departments will be assessing offshore wind licencing areas further in the future, allowing for a more rigorous ranking process once additional information is compiled.

The removal of the South Coast Fjords Study Area from the Recommended Licencing Areas was determined in response to Parks Canada's request to exclude the area from offshore wind development areas, to allow the NMCA establishment process to proceed without the stressor of development occurring. Miawpukek First Nation (MFN) and Qalipu First Nation (QFN) also supported this exclusion. Once the NMCA is finalized, additional assessments could occur to determine the feasibility of the areas excluded from the NMCA for offshore wind, in collaboration with all signatories of the NMCA MOU (Government of Canada, Government of Newfoundland and Labrador, Town of Burgeo, MFN and QFN) and other relevant departments and interest groups to ensure developments do not negatively affect the reasoning for protection of the area and to avoid or minimize the potential of edge effects.

We are available to meet with your officials upon request and we look forward to any comments on the [Draft Regional Assessment Report](#) during the 60-day review period.

Yours truly,

Committee for the Regional Assessment of Offshore Wind Development in Newfoundland and Labrador: Shayne McDonald (Chair), Glenn Blackwood, Leslie Grattan, Brian Power, and Paul W. Saunders