

Maritime Aboriginal Peoples Council



The Maritime Regional Aboriginal Leaders
Intergovernmental Council of Aboriginal Peoples
Continuing to Reside on Traditional Ancestral Homelands

Forums

- Leaders Congress
- MAPC Commissions/Projects
- MAARS Secretariate
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December 19th, 2024

Attn: Committee for the Regional Assessment of Offshore Wind
Development in Nova Scotia

Sent via email to: [OffshoreWindNS-
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RE: Draft Regional Assessment of Offshore Wind Development in Nova Scotia

To Whom It May Concern,

On behalf of the Maritime Aboriginal Peoples Council (MAPC), and the Maritime Aboriginal Aquatic Resources Secretariate (MAARS), thank you for attending the meeting on November 26th, 2024, at our offices to further discuss the Draft Regional Assessment of Offshore Wind Development in Nova Scotia. Recognizing that our time was relatively short, we appreciate the responses to the questions and comments we provided at that time. As requested, we did follow up afterwards with the remainder of questions and look forward to reading your responses upon our receipt. We have framed our additional questions, comments, and concerns by section in the Draft Regional Assessment for ease of response.

For context, we would like to provide you with a brief history of MAPC and our partner Native Councils. For over forty years, the three Native Council partners of MAPC have continued to be the Aboriginal Peoples Representative Organizations representing and advocating for the Rights and issues of the Mi'kmaq/Wolastoqiyik/Peskotomuhkati /Section 91 (24) Indians, both Status and non--Status, continuing to reside on their unceded Traditional Ancestral Homelands. In the early 1970s, the communities recognized the need for representation and advocacy for the Rights and Interests of the "off-Reserve community of Aboriginal Peoples, "the forgotten Indian". These women and men self-organized themselves to be the "voice to the councils of government" for tens of thousands of community members left unrepresented by Indian Act-created Band Councils and Chiefs. Based on the Aboriginal Identity question, Statistics Canada

(2021 Census - 25% sample) enumerate 25,415 off-Reserve Aboriginal Persons in New Brunswick, 42,580 in Nova Scotia, and 2,865 in Prince Edward Island.

Each Native Council in their respective province asserts Treaty Rights, Aboriginal Rights, with Interest in Other Rights confirmed in court decisions, recognized as existing Aboriginal and Treaty Rights of the Aboriginal Peoples of Canada in Part II of the *Constitution Act of Canada*, 1982. Each Native Council has established and maintains Natural Harvesting Regimes, and each have a co-management arrangement with DFO for Food, Social, and Ceremonial use of aquatic species, through the: Najiwsgetaq Nomehs (NBAPC), the Netukulimkewe'l Commission (NCNS), and the Kelewatl Commission (NCPEI).

Additionally, of significant note, the NCPEI, NBAPC, and NCNS, through their Aboriginal Communal Commercial Fisheries Entities (ACCFEs) have long participated in the commercial fisheries for many species through licences issued under the authority of the Aboriginal Communal Fishing Licences Regulations, and also with additional commercial licences purchased and fished as communal commercial licenses for the continued support and benefit of their communities' access to aquatic resources for commercial economic development purposes. The extensive involvement of the Native Councils and MAPC-MAARS in fisheries and oceans management in partnership with the federal government has provided a number of opportunities to participate in processes associated to changing uses of the ocean ecosystem. The perspectives provided from MAPC-MAARS and our partner Native Councils are derived from a combination of domestic and international experience, scientific understanding, and hinge upon an Aboriginal eco-centric worldview.

The MAARS mission is to collectively advance the rightful share to Atlantic aquatic resources for the sustained economic growth of the Maritime Aboriginal Peoples continuing to live on their traditional ancestral homelands. MAARS continues to approach engagements with the vision, mission, and many goals for MAARS at the forefront. We'll now continue with the commentary as it relates to the draft Regional Assessment of Offshore Wind Development in Nova Scotia. Please note that this letter is supplemental to the Draft Report Feedback Spreadsheet.

2.2 Key Studies and Constraint Mapping

DFO Marxan with Zones Analysis

Culturally significant areas are critical to determine low-conflict areas for OSW sites; however, they are not included within the scope of DFO's Marxan with Zones Analysis for Potential Locations of Low-Conflict with Offshore Wind Development (Page 47). Recognizing that the further offshore the area, there is less potential for overlap with culturally-significant areas, it is still important to highlight as the committee is referring to DFO's Marxan Analysis to assist in determining which areas to recommend for OSW development. Therefore, MAARS is advising the Regional Assessment Committee to provide additional consideration to culturally significant areas when determining potential locations of low conflict.

2.6 Lessons from Other Jurisdictions

Compensation

When it comes to compensation for losses due to OSW development, cultural and social losses cannot be treated equivalently to economic losses as money cannot replace or repair cultural and social values. While compensation is largely outside of the scope of the Regional Assessment Committee, there is still space to discuss the importance of ensuring there is appropriate compensation for non-economic losses that are often overlooked and minimally understood. This can potentially be addressed in Table 10.4 (Page 335). For this reason, consideration must be provided to ensuring that adequate and meaningful approaches are taken by the proponent to determine appropriate compensation measures for any cultural and social losses that are experienced. These approaches to determine compensation measures must be based on meaningful engagement with affected individuals in an accessible manner, where everyone has an opportunity to voice their opinions. Community Benefits Agreements are an effective approach to explore how to compensate a community for social elements in a non-dollar value that ensures long-term investment in the community on behalf of the proponent. This is something that can be incorporated into the leasing process for an OSW farm.

Similarly, there is no true means to accurately consider the losses associated with future economic development in the fisheries landscape. For example, there is evidence of ecological shift in the Atlantic Ocean as there are increased observations of sub-tropical species present in fisheries landings. The challenge is in the forecasting given the high variability of all the factors impacting on a species' ability to thrive in a newer environment. That said, there is a priority for Indigenous Peoples to enter into the new and emerging fisheries space; as such, the potential loss of that priority access is a valid concern. As above, this is an element that could, and should, be incorporated into the leasing process for OSW development.

4.6: Socio-Economics

Demographics

Section 4.6.1 Demographic Profile, when discussing the Indigenous population in Nova Scotia, there is no mention of the Native Council of Nova Scotia (NCNS), which is accountable for representing the ~42,580 Aboriginal Persons residing off-Reserve in the province of Nova Scotia. The right of Indigenous Peoples to choose their own representation is a fundamental aspect of their self-determination, as outlined in international human rights law, particularly the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). This right acknowledges that Indigenous communities have the autonomy to freely determine their political, social, and cultural systems, including how they wish to represent themselves in decision-making processes at local, national, and international levels.

More specifically, Article 18 of UNDRIP states that Indigenous Peoples have the right to participate in decision-making in matters that affect them, through representatives of their own choosing. This means that Indigenous communities should not be subject to external imposition of representatives or leadership but should have the freedom to select individuals or groups who genuinely reflect their values, needs, and aspirations.

The Supreme Court of Canada in a landmark decision in *Daniels v. Canada* (Indian Affairs and Northern Development), 2016 SCC 12. declared that the word “Indians” in s.91(24) includes the Métis and non-Status Indians. As such, members of the NCNS who have self-identified the NCNS as their chosen representative body are included within the definition of the word “Indian” of Section 91(24) of the Constitution Act, 1982. Despite this Supreme Court jurisprudence, there lacks any mention of the NCNS, or the off-Reserve community outside of those who are associated with a Nova Scotia Indian Act-created Band. The use of the Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)’s ‘First Nation Profiles’ does not accurately represent the Indigenous community across Nova Scotia and ignores the non-Status, or those who are Status but are not listed or associated with a Nova Scotia Indian Act-created Band.

Infrastructure

With regard to the section on roads, rail, and air we would offer commentary on the assessment of Nova Scotia’s highway access. Our understanding is that although Nova Scotia’s highways do provide good connectivity between the communities listed, not all the ports have direct access to the highway. We are concerned that the roads which provide direct access to the ports and main stretches of highway may not have the capacity to accommodate an increased volume of large vehicles. Even if these roads are only used to transport smaller components, they may still result in a significant bottleneck for traffic travelling to the port. The potential negative effects of this increase in volume would not only impact the ports but the local communities at large.

We suggest that looking into the direct road access to ports is significant when considering Nova Scotia’s ability to service OSW development via its road system. If this was part of the analysis conducted by the committee, we suggest that this is made clear in this section of the final report.

Recognizing that this is outside of the scope of the Committee and the Secretariat, the Province of Nova Scotia must be cognizant of these impacts and take appropriate account of them when developing infrastructure improvement plans. Without this type of advance planning, Nova Scotia will be unprepared to control the consequences of industrial expansion.

Tourism, Recreation, and Heritage

Within Section 4.6.6 Tourism, Recreation, and Heritage, it was noted that Parks Canada has recommended a minimum protective buffer for 45-km around the Cape Breton Highlands National Park and a 25-km buffer around the Fortress of Louisbourg National Historic Site. While the recommended 25-km buffer for the Fortress of Louisbourg is included within the general recommended 25-km buffer, it is unclear from Figure 6.2 Technical and Administrative Constraints, whether the 45km National Park buffer has been considered within the constraints. Has the Committee chosen not to consider this buffer or is the buffer identified in other mapping that was not included within the Draft Assessment?

Other Factors Raised

Food security and food sovereignty are topics of critical importance, particularly for Indigenous communities. This importance is highlighted in the Draft Report where it states, “Food security

and food sovereignty are inexorably linked for Indigenous Peoples because the harvest of traditional food is a key element in the achievement of both these constructs” (Page 161). While this importance is noted in the draft report, there is no specific recommendation around how this will be addressed. While MAARS recognizes that most rights-based fisheries are not operating 25 km offshore, it is wrong to simply assume that no one is practicing their right to fish in these locations. OSW developments have the capacity to impact breeding and spawning grounds, in addition to the actual access, which can influence both one’s sense of food security as well as the ability to achieve food sovereignty. Further, access to fish and harvest aquatic resources may be impacted by the OSW transmission cables connecting to shore which presents another potential barrier to food security and sovereignty. Therefore, we would like to see a specific recommendation respecting the preservation of food security and sovereignty in the face of OSW developments, possibly included within Recommendation T4-1 (Page 335).

5.6: Overview of Valued Components

Aerofauna

While the mapping from Environment and Climate Change Canada (ECCC) was only recently available to the Committee, we would like to see consideration for the migratory routes for both migratory birds and bats included within the Technical and Administrative Constraints. While discussed in the meeting on November 26th, 2024, we would like to reiterate the importance of considering the fall avian migration routes (Figure 4.9, Page 113).

The Committee on the Status of Endangered Wildlife in Canada (COSEWIC)’s assessment and status report on the Hoary Bat *Lasiurus cinereus*, Eastern Red Bat *Lasiurus borealis* and Silver-haired Bat, *Lasionycteris noctivagans*, in Canada (2023) classifies wind energy development as a high to very high impact on these three migratory bat species. Migratory bats make up most bats killed by wind turbines in North America, and it is also acknowledged that the current projections of fatality rates by wind farms are likely gross underestimates. The development of offshore wind will only exacerbate the existing data gaps in mortality due to the problematic nature of recovering or identifying bat mortality at sea.

In Table 5.5 (Page 185), the recommendation of curtailment measures does not explicitly state migration; however, this is a key time of year to implement these measures. COSEWIC (2023) identifies turbine curtailment during key periods as an important mitigation measure, with the potential to reduce migratory bat fatalities by up to 50%. We would like to see this recommendation encompass the importance of curtailment measures during migratory periods.

Other Ocean and Air Space Users

The weather conditions in the study area can be dangerous with high winds and storms making it difficult for vessels to maintain a steady course. This increases the risk of collisions with the OSW platforms and vessels that are transiting through or operating in the area. Dynamic Positioning Systems (DPS) can increase overall safety of vessels operating near OSW sites by allowing vessels to maintain intended headings during conditions that would otherwise reduce maneuverability. We

suggest that DPS could be explored as a navigational aid for vessels operating in close proximity to OSW sites.

Physical and Cultural Heritage

There is potential for conflict with culturally significant areas where the transmission cables from OSW farms connect to shore, specifically in terms of their construction and operation, so there must be appropriate considerations for how these cables have the potential to impact cultural uses of the locations that they run through that extend beyond impacts to commercial fisheries. Special consideration should be given to traditional and cultural activities and sites of significance that exist in the nearshore through which the cables may extend. Further, there must be an assessment concerning the social impacts of these actions and subsequent mitigation measures identified. These impacts can be accounted for as an additional section in Table 5.8. Physical and Cultural Heritage – Effects, Mitigation and Monitoring Measures.

6.4 The Recommended 25 km Buffer

If the recommended 25km buffer is not fulfilled, there will be a significantly higher potential for conflict with culturally-significant areas. Therefore, there must be considerations and/or recommendations in place in lieu of a smaller buffer or no buffer being implemented that allow for culturally significant areas to be addressed using a Two-Eyed Seeing approach and adaptive management which the RAC have recommended as methods to address unforeseen circumstances (Page 265).

6.6 Potential Development Area Details

Western/Emerald Bank

We have concerns about the Western/Emerald Bank Marine Refuge (WEBMR) being considered as a PDA for OSW. We understand that since some fisheries are already excluded from this area, developing OSW here would minimize conflicts with fisheries. We also understand that there is an ever-increasing demand for space at sea and that the co-occurrence of projects may be necessary or even advantageous in some areas. However, we believe that currently there are too many unknowns to determine whether OSW development will compromise the conservation objectives of the WEBMR.

The WEBMR was designed to protect numerous benthic species/communities though their abundance and distribution within the refuge is not well understood. Regarding OSW, the floating wind installations are still a new technology and not much is known on the level of disturbance their construction and operation will cause benthic habitats. It is our suggestion we expand our understanding of both the WEBMR and floating OSW installations before explicitly recommending WEBMR as a potential site for development.

7.0 Cumulative Effects

Tiered and Shared Responsibilities

This section states that “there must be reliance on the predictive modelling” when it comes to understanding the impacts of climate change in the study area. It is unclear how much influence predictive modelling will have on the selection of PDAs. Given the time scale of developing OSW, it is likely that we will observe changes in the study area caused by climate change throughout the process. We understand that being able to predict these changes is an important part of developing OSW in a responsible manner, however we are interested in knowing the extent to which modelling may influence where OSW is allowed to be installed.

9.1 Environment

Pelagic Habitat

Section 4.3.3.1 highlights the fact that the at-sea movements and behaviour of many species in the Scotian Shelf region are still poorly known. Therefore, to assess the potential effects of OSW development on benthic and pelagic species, the committee should recommend that in addition to sections 9.1.2 and 9.1.3 where augmenting the data based on time, frequency of monitoring, and spatial coverage is discussed, the data should also be augmented to expand upon the number of species that are being studied. This will enable a better understanding of culturally significant species such as Atlantic salmon and American eels along with their migration patterns helping to fill those existing data and knowledge gaps.

10.0: Recommendations (from the Committee)

Theme 1: Existing Knowledge, Gaps, and Necessary Research

Recommendation 2 (T1-2) - MAARS would like to see more detail in the pre-commitment phase, specifically what monitoring and research activities might be completed and how the Mi'kmaw Ecological Knowledge Studies (MEKS) fit into this phase. Will the MEKS be undertaken by each proponent as projects are proposed, or will a broader more comprehensive MEKS be undertaken, either provincially or federally, prior to the issuance of any offshore wind licenses?

As well, there is no reference to the Native Council of Nova Scotia when referring to the ‘key Indigenous organizations’ and Mi'kmaw Ecological Knowledge Studies. We would like to see the NCNS included within the key Indigenous organizations in Nova Scotia, and by extension the Maritime Aboriginal Peoples Council which represents the interests of the off-Reserve Indigenous community across Nova Scotia as well as New Brunswick and Prince Edward Island through their respective Native Councils.

Recommendation 5 (T1-5) - In reference to section 10.1 (Page 321) recommendation T1-5, MAARS would like to acknowledge that we support the committee's recommendation to provide funding to Mi'kmaw organizations for research on adaptive management as long as these organizations are reflective of **ALL** Indigenous communities throughout Nova Scotia. MAARS is

happy to be an active participant in this research for the committee. MAARS also supports and would like to emphasize the importance of taking an Indigenous ecocentric worldview when conducting any work relating to the development of OSW, for example, using a Two-Eyed Seeing approach.

Recommendation 6 (T1-6) - When reading over Recommendation T1-6 which details the knowledge gaps related to marine mammals, we found that it could be expanded to better reflect the knowledge we lack and where our efforts should be directed as it relates to overlapping with OSW. Specifically, for the bullet which references investigating interactions with the technology associated with OSW development, only fixed and floating platforms are used as examples. It is unclear if this references all the processes associated with installing these platforms or just the platforms themselves. We would be interested in seeing this expanded to clearly include all processes involved in the installation and operation of OSW (surveys, piledriving, cable laying, etc.).

There is a prime opportunity to refer to the mitigation measures relevant to marine mammals listed in Table 5.4. With the increase in vessel traffic on the shelf it is important that we investigate both the effectiveness of current mitigation measures, and new ways of limiting the impact on marine mammals. Including this point as part of the recommendation helps enforce that the well-being of marine mammals are an integral aspect of developing OSW.

Theme 4: Coexistence and Compensation

It is critical that other marine activities are able to positively co-exist with OSW. For example, our partner Councils are all involved in communal commercial fishing and we have significant concerns about the overlap of active fishing zones with the PDAs. The landings data is only representative of a subset of spatial data associated with active fishing – it does not take into consideration the route to a preferred fishing ground, the amount of time spent in area, it is only representative of the coordinates associated with where a fish or trap was hauled onto the vessel. Realistically, this may be a ‘best estimate’ of that location given the flurry of activity on the boat at time of landing. Moreover, it is not being used to perform any type of forecasting in conjunction with predictive climate modelling. In short, it is not fully representative of the information necessary to investigate the level of overlapping use, nor the potential economic losses associated with the loss of a commercial fishing area. As discussed in this draft report, we agree that compensation should be used only as a final resort, when all alternatives have been exhausted. With this in mind, we would like to see a recommendation to comprehensively investigate the possibilities for co-existence with different fishing gear in Nova Scotian waters. MAARS would also suggest that the Committee make recommendation to review predictive climate modelling in association with time series data for fisheries of interest – perhaps a starting point could be those species which have already been batched through DFO’s ‘Fish Stocks Provisions’ under the *Fisheries Act*.

In previous sections, the report identifies that there has been some success with co-existence between gear types and fixed platforms. Given the potential prevalence of floating platforms, we are skeptical that similarly successful co-existence will be possible. We would also reiterate that the PDAs are recommendations and may not be followed to the letter. Although there has been

great effort made by the Committee to minimize conflict with fisheries, we are of the opinion that overlaps with fishing activities will exceed what is predicted in this report. Without supporting evidence to suggest otherwise, it would be best to assume that the presence of OSW would result in the exclusion of some fisheries and begin to plan accordingly. For these reasons, understanding the potential for co-existence is a priority for us and we would like to see the significance of this point reflected in this section of the report.

Theme 6: Governance

Theme 6 covers the recommendations as it relates to governance for the CNSOER. T6-2 recommends First Nation representation on the CNSOER Board. As discussed in our meeting on November 26th, 2024, MAARS has concerns around ensuring that only one individual is not able to appropriately represent **all** Indigenous people in Nova Scotia. MAARS' recommendation for the board is to see two individuals elected, one to represent the on-reserve and a separate individual for the off-reserve. This ensures that the concerns of both communities are addressed and represented through the CNSOER board.

Theme 7: Education and Training

The recommendations under Theme 7 provide guidance to create programming and curriculum through the Province of Nova Scotia. As noted in our meeting, MAARS fully agrees that this is a critical necessary action item for the Province of Nova Scotia; however, there appears to be a missing component to this recommendation which concerns opportunities for scholarships or paid upskilling training to provide incentives for Nova Scotians to participate in the offshore wind development initiatives.

Similarly, the Indigenous Skills and Employment Training (ISET) program is a federally-funded skills and training program that supports Indigenous individuals in acquiring skills and securing employment opportunities. This program plays an important role in providing opportunities for many Indigenous candidates and could play a key role in building Indigenous Peoples' capacity for the OSW industry. While outside of the scope of the Committee, we would recommend a change in the available funding under the ISET program to include skills required for offshore wind development. We will follow up with ISET programming in support of this recommendation.

Overarching Comments

One of the recommendations during our meeting on November 26th, 2024, was to explore the feasibility of an offshore wind pilot site, similar to the FORCE site for tidal energy. Regardless of where this type of project takes place, whether it would be within an umbrella research group or a separate organization, the first pilot site should have a significant time frame (5 to 10 years) for research. This type of project should be jointly funded by the provincial and federal governments, in association with OSW developers, and administered under a joint body, like the CNSOER. Part of creating a project test site is not simply to observe impacts, but also to provide training for people to work on the offshore wind developments. Given that Maine is currently looking to create a research project in the water, we should be considering that initiative and seek collaborative potential. While this could provide an excellent collaboration opportunity, we should be cautious

to not rely solely on this test site in Maine to inform our understanding of offshore wind, in particular the floating turbine installations.

Lastly, we would like to draw attention to the Draft Assessment's lack of inclusion of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the requirement for Free, Prior, and Informed Consent (FPIC). The *United Nations Declaration on the Rights of Indigenous Peoples Act* came into force in 2021, and all Canadian departments, including IAAC, are held to working towards implementing UNDRIP, including FPIC, into the full scope of their work. Having been privy to the collective amnesia of the articles under UNDRIP and the importance of making genuine efforts to implement each article, the Draft Assessment should make clear reference to UNDRIP, and specifically FPIC.

To summarize the commentary above;

1. MAARS recommends the Committee include social and cultural considerations when determining low-conflict PDAs, in addition to consulting the Marxan with Zones Analysis.
2. The Committee should recommend that proponents consider methods to compensate communities for non-economic losses such as social and cultural impacts.
3. The leasing process for OSW development should prioritize the entry of Indigenous Peoples into the new and emerging fisheries space.
4. The demographics profile must include **all** Indigenous peoples living off-reserve in Nova Scotia, encompassing 42,580 Aboriginal Persons.
5. We are concerned that increases in the volume of traffic at the identified ports cannot be supported by the roads connecting the ports to the main stretches of highway.
6. Has the committee taken into consideration the recommendation from Parks Canada for a 45-kilometer buffer around the Cape Breton Highlands National Park?
7. MAARS would like to see a specific recommendation around the protection of food security and sovereignty in the face of offshore wind developments.
8. We request that the committee considers the migration paths for aero fauna within the Technical and Administrative Constraints.
9. Has the committee explicitly considered the importance of curtailment measures for aero fauna during key migratory times?
10. Consideration should be given to cultural activities and sites of significance that exist nearshore where cables may extend through, and how this can lead to substantial social impacts.
11. If the recommended 25km buffer is not fulfilled, there must be considerations in place in lieu of a smaller buffer or no buffer being implemented that allow for culturally significant areas to be addressed.
12. We do not support the listing of the WEBMR as a PDA given the lack of knowledge on the marine refuge itself and the impacts of floating wind installations.
13. We recommend the committee clarify the extent to which predictive modelling may influence where OSW is allowed to be installed.
14. How will the MEKS fit into the pre-commitment period, and who will be responsible for completing these studies?
15. MAARS requests that the NCNS be included within the list of 'key Indigenous organizations' in Nova Scotia.

16. We request that Recommendation T1-6 expand on the processes to explore/evaluate mitigation measures for marine mammals.
17. We request that Theme 4: Coexistence and Compensation clearly demonstrates the intent to investigate the possibility of co-existence between OSW and fisheries, with specific attention given to floating installations.
18. To ensure representation of **all** Indigenous people in Nova Scotia on the CNSOER, MAARS recommends the appointment of **two** dedicated Indigenous positions, one to represent the off-reserve population and the other to represent the on-reserve population.
19. Will there be consideration included in the Education and Training recommendations for scholarship and paid upskilling opportunities?
20. Will there be recommendations included in Education and Training for updates to the ISET program to ensure available funding for Indigenous candidates to be involved in OWS development?
21. While the test site in Maine can be an excellent collaboration opportunity, we should be cautious to rely solely on this site to inform our understanding of offshore wind, in particular the floating turbine installations.
22. MAARS recommends the committee explore DPS as a mitigation measure for vessels to reduce collision risk.
23. The committee should recommend that data be expanded to include a greater number of species being studied, in addition to current recommendations regarding augmenting data based on time, monitoring and spatial coverage.
24. MAARS supports the committee's recommendation to fund Indigenous research as long as it is representative of all Indigenous communities.
25. MAARS supports and emphasizes the importance of taking an ecocentric worldview when developing OSW farms.

We appreciate this opportunity to engage on the draft Regional Assessment of Offshore Wind Development in Nova Scotia. We look forward to continued dialogue as we continue to advocate for the rights of Off-Reserve Status and Section 91(24) Indians/Mi'kmaq/Aboriginal Peoples of Nova Scotia, New Brunswick, and Prince Edward Island.

Advancing Aboriginal Fisheries and Oceans Entities
Best Practices, Management, and Decision-making

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