

## ***Guysborough County Inshore Fishermen's Association***

### ***Comments on the Draft Final Report from the Regional Assessment of Offshore Wind Development in Nova Scotia***

#### **GCIFA feedback on Recommendations**

##### **T1-1 Develop a Scotian Shelf Collaborative Research Initiative (SSCRI)**

GCIFA recommends Guysborough County requires a specific research initiative especially since four of the eight PDAs are marine areas off Guysborough County. These PDA's will likely be the first to be developed. Proponents have expressed interest in offshore marine sites off Guysborough County waters, as far as we are aware there are no proponents who have expressed interests in the other PDAs.

##### **T1-2 Fund a Mi'kmaw Ecological Knowledge Studies (MEKS)**

GCIFA recommends a commercial fisheries study funded that encourages traditional and cultural knowledge of the eight identified PDAs. Commercial fishing usage of the banks off Canso go back four centuries. Misaine, Canso and French Bank have historical and cultural importance to the fishing industry. The fishing off Canso was world famous and known as the most lucrative fishing area in all of North America. For centuries these marine banks have sustained our coastal communities and provided not only a local source of food but also our way of life. Hundreds of Spanish, British and Portuguese fishing fleets flocked to Canso each year to fish these banks, long before Canada existed as a sovereign nation. This fishing ultimately leading to more permanent settlements which lead to the birth of our country. To summarize the cultural importance of these fishing banks is impossible to put into words.

The cod moratorium is affecting our fishing activities, but positive news regarding other species of groundfish are seeing large population increases with an eastward shift in the population range. The ground fishery targeting predominantly halibut happening along the Scotian shelf has participants of fish harvesters from wide across the province. Renewable energy projects close to the 25 km buffer will ultimately affect this group of fishermen.

##### **T1-3 Create a shared repository of data and sources.**

GCIFA recommends all research data be open sourced without a time constraint as was the case with the petroleum industry. We would like to note commercial fishing is a competitive industry. Disclosing our data could be detrimental to our family-owned fishing businesses.

##### **T1-4 Provide support for ongoing research in federal departments on modelling and marine spatial planning.**

##### **T1-5 Provide funding to Mi'kmaw organizations for research on adaptive management.**

GCIFA recommends funding for fisheries organizations for research on adaptive management.

T1-6 Prioritize and expand the general collection of environmental data, especially in the vicinity of the PDAs, including the bathymetric and substrate characteristics, bird behaviour and habitat use, and marine mammal behavior and habitat use within the RA Study area.

Yes, we agree, we need baseline data, and this should be tied to tier 1 and tier 2 designations.

T1-7 Open discussions with the state of Maine to contribute to and develop mutually supportive research agenda associated with their proposed floating OSW test site.

Yes we agree with this recommendation.

T1-8 Establish participant funding to last at least five years.

We would like the RA committee to suggest who or what department should pay for this funding. We also suggest specific fisheries groups funded for ongoing talks between industries.

T2-1 Establish a port advisory group. Yes, we agree, but who will fund this group?

T2-2 Undertake Class D cost estimate and model effects

Whose responsibility will it be to take this task on, who will pay for it?

T2-3 Adopt a regional /national planning approach for the provincial OSW roadmap

Yes, it is confusing and scary for both the federal government and provincial government to be moving forward on their own. We do not want provincial Ministers adding more offshore wind projects because the need of the province has increased due to large projects on land.

T2-4 Initiate socio-economic studies for key communities

We agree with this recommendation, priority to communities first impacted.

T2-5 Engage the departments of Education and Early Childhood Development and Skills, Labour and immigration in the evolution of the OSW Roadmap. Yes, we agree.

T2-6 Establish targeted immigration and recruitment programs to attract foreign specialists

There is a housing crisis in coastal communities. Temporary housing structures would need to be installed or built. Hotels and Airbnb rental properties as well as more permanent housing options. Apartment buildings etc. Recommendations on who is going to be responsible for the build.

T2-7 Compile a database on GBA+ research specific to OSW industry. Yes, we agree.

T3-1 The establishment of a 25-km coastal buffer zone

- "Other incursions are likely to be requested by developers for a variety of reasons including project economics (generally more favourable closer to shore) or changed

circumstances such as the availability of new data or technological innovations. The Committee is very cognisant of the many unknowns in the marine environment including the impact of climate change on oceanographic conditions and species distributions. Some of the data gaps (see section 9) are specifically addressed in the report's recommendations (see section 10). Technologies continue to evolve that will improve OSW design and enhance data gathering and monitoring techniques. In recognition of all these facts, the Committee supports the adoption of principles of adaptive management to enable an evaluation of a request for an incursion into or modification of the buffer. In practice, this would require that the regulatory authorities, in conjunction with key interests but always including fishers and First Nations, develop hypotheses that the party seeking the incursion or modification to a boundary (coastal buffer or PDA) would have to address through planned engagement and a defined research program. Adaptive management allows for changes to the Committee's recommendations through engagement and analysis."

GCIFA believes this section of the final draft report opens the door to disregard the 25km coastal buffer. Is this a provincial want? It absolutely gives discretion for developers to negate the 25km buffer. GCIFA recommends the final draft report encourage only construction related activities and transmission cables to interrupt the 25km buffer. These impacts alone will be substantial for the fishing communities along the coast. Without that coastal protection, energy proponents with government approval could approach property owners and fishermen along the coast offering mitigation in exchange for views of turbine blades, noise impacts and the potential to impact the tourism industry, commercial seafood harvesting, shipping industry and recreational boating communities. This could cause a divide within the community. We recommend no renewable energy development projects occur outside the identified PDAs. We recommend no additional new PDAs be identified. The Regional Assessment has identified more than enough potential development areas for renewable energy. It is time to remove areas that have been identified as not suitable.

Health Canada's response to the committee's questions regarding human health is based on this 25 km coastal buffer zone being implemented. "A 25 km coastal buffer zone, established in the interim report, should be sufficient to eliminate most of the potential adverse noise impacts on human health." Health Canada suggests if projects are situated within the 25 km buffer, the potential for shadow flicker to impact human health becomes more relevant. Health Canada recommends more research is needed on many potential impacts such as EMF. Health Canada recognizes there is a potential for human health effects through contaminated seafood. They suggest an evaluation of impacts on marine species consumed by humans. Nova Scotia Fisheries and Aquaculture should initiate a program to explore this in the future before construction and after operation of wind projects. There is no mention in the response about the potential of Nova Scotians who work on our coastal waters' health to be impacted. We would have liked to see Health Canada suggest thresholds for noise, distance to shore and EMF. What protections are there for Canadians from offshore renewable energy projects?

T3-2 The adoption of Tier 1 and Tier 2 Proposed Development Areas (PDAs)

Methodology is good. We are concerned that energy companies will have influence on future designations of moving PDAs from Tier 2 to Tier 1 without the necessary baseline data and investigations that is required. Legislative regulations surrounding when and how tier 2 areas can become tier 1 areas should be implemented and a clearly printed definition and rationale for designation of tier 1 and tier 2.

T3-3 a-f Development of bid criteria and bidder pre-qualifications

T3-4 Development of guidelines regarding in-field personnel transfers

T3-5 Requirement for adequate security related to abandonment and decommissioning activities

T3-6 The potential reduction of existing abandoned pipeline corridor exclusion zone.

2.5 NMile restriction on bottom gear fishing could be reduced, this is a good thing but consideration for gear configuration that would face restrictions due to the characteristics of the gear type, i.e. halibut longline gear.

T4-1 The establishment of a compensation regime to address economic loss caused by exclusion based on the principles set out in T4-1a to T4-1d

**GCIFA Feedback and Recommendations for the Final Report**

- We originally had 9 months to look at our activity within the 6 PDFA, GCIFA have now 60 days to respond to the final draft report where new marine areas have been identified for the first time in this impact assessment such as Misaine bank.
- GCIFA recommends Transport Canada conduct a study that investigates cumulative marine traffic in the Strait of Canso to include spill risk, ocean noise, marine mammal vessel strike risk and impacts to commercial fishing from extra marine traffic.
- Nova Scotian coastal waters, Guysborough County fishermen and ports within the county are already experiencing increased marine traffic from the wind industry. We are and will continue to experience impacts now with no community benefits commencing until maybe 2030? How can this lag in benefits be resolved or mitigated?
- Fishing activity intensity does not include the water space the vessels travel through to get to specific fishing grounds nor will it include the trip to a port to offload the product. The impacted harvesters may be vessel owners that travel through PDA but may not have landings in that ocean space. Impacted harvesters will also be fishing boats that are impacted by the transmission cables to shore not within the leased renewable energy site. How can these fishermen show they are going to be impacted? What evidence will suffice for attaining compensation?
- The research vessel Coriolus II entered a PFDA 19 days during the month of May, and 7 days during the month of July, 3 days in August during 3 months of monitoring. This

activity demonstrates impacts are being felt by the fishing industry already. Vessels have been conducting sonar surveys in 2024 and this type of activity is going to continue. GCIFA requests that DFO collect empirical data on ocean noise from these surveys as they are ongoing. Computer models and computations are great for estimating but now that these surveys are happening, DFO can collect real-time data for assessing ocean noise.

- The Marxan with zones analysis conducted by DFO considered Marine Refuges as exclusion areas for the wind zone as OSW has not been assessed as compatible or incompatible within existing regional Marine Refuges. GCIFA recommends a new Marxan analysis for this to be assessed.
- It will take time and resources for GCIFA and other fishing associations to aggregate their fishing data collected within PDAs. Separating fishing vessels that fish in the PDA and vessels that have travelled through on their way to port/destination will also be a cumbersome task. Funding for such tasks would be required.
- The areas identified in the wind zone by the Marxan spatial analysis in the summed solutions EXCEED the area necessary to meet the initial provincial target of 5 GW as detailed on page 5 bottom paragraph of the "Summary of DFO's Marine Spatial Planning Decision Support Tool using Marxan with zones"
- How can Nova Scotia, seafood harvesters and fishing representatives plan for this new industry without knowing how much space this industry requires? Marine spatial planning would require at a minimum this information. We voiced our concerns in our previous submission about identifying large ocean areas for renewables when "the need" has not materialized. Nova Scotia's need for renewable energy and the benefits to Nova Scotians should be considered before the needs of our federal government's carbon emission reduction targets. Nova Scotia is a small province. Our emissions are approximately 2% of Canada's carbon emissions. The province of Alberta and Saskatchewan are our countries biggest emitters. A small, largely non-industrialized province like Nova Scotia should not have to carry the weight of these other provinces which refuse to implement regulations on polluting industries.
- Regarding the July 23, 2024 letter, from the Minister of Environment and Climate Change Canada, the Minister of Energy and Natural Resources Canada and the Minister of Natural Resources and Renewables, we are very conflicted when the province and NRCAN announced 2,000km<sup>2</sup> to meet their 5GW target as we received no notice from these departments that their targets had changed. Where is the roadmap heading? What is the target now? We deserve an explanation for the increase in ocean space designation.
- GCIFA submitted a request regarding whether the energy projects will be using a 3MW/km<sup>2</sup> density and if this density would be a regulatory standard? Will the province also adopt this density standard? The answer we received back from the RA committee members were there has been none selected yet and it will depend on specific projects.

- The new eight PDA's have a collective area of 31,200km<sup>2</sup>. The previous 6 PFDA's had an area of 11,510km<sup>2</sup>. The rationale for expanding the potential offshore wind areas was recent geologic surveys did not find suitable substrate for monopile installations and water depth of 100m-300m is now being considered. If this is indeed the result of new substrate surveys, should those areas that were not found to be suitable for renewable energy sites be removed and deleted from further consideration? Shouldn't the map of potential renewable energy areas be updated to display the no-go substrate areas? Can the Minister of renewable give this space back to other ocean users since it is not an amicable spot for turbine placement?
- Another explanation for areas increasing in size is not enough data, not enough information is known yet to determine where many wind farms developments might take place. If we don't have the information yet to determine spatially where these wind development sites should or could be placed... why are we designating areas now? It is disappointing that the information required to further investigate these preidentified areas in the interim report was not provided to the RA Committee or not available for the committee to conduct any further investigations. GCIFA provided information about our fishing footprint although our input appeared in the final draft report, it did not change the boundaries of the PDAs. Is fishing industry feedback not sufficient enough to alter boundaries of PDAs? What industry has the power to implement changes to PFA boundaries? GCIFA feels our input although included in the final draft was not important enough to affect change. The fine tuning of spatial designation should come from developers and if there is no interest from developers, why designate large pieces of ocean space for renewable energy?
- We are forced to choose areas for observation by AIS tracking using software such as Transport Canada's EMSA but given the large PDAs, GCIFA does not have the capacity to monitor over 33,000 km<sup>2</sup> of ocean space. We have fishermen that travel to Sable Island Bank and Misaine but we had to choose which one to monitor. That was a difficult decision.
- It does not feel like we are any farther ahead in this process by expanding the areas under consideration?
- GCIFA has concerns that there will be no limitations or restrictions in these PDAs for example maximum capacity for a project, maximum number of turbines, capping the number of projects within a PDA, leasing this space out to energy companies when we do not have the data to estimate noise impacts of 4 wind farms in a 431km<sup>2</sup> PDA. For example, although a PDA may be split into 5 licenses, should there be 5 wind farms in a PDA? How has that worked in other areas of the world? What is the impact of one PDA having all the turbines and the other areas having none? Could this be good for ocean life and other marine users? This is a monumental concern for GCIFA. As we stand to lose access to thousands of kms of ocean space, since 4 of the 8 potential development areas

are off Guysborough County. These 4 PDAs have an area of 7,560km<sup>2</sup> equalling 756,000 Ha of ocean space.

- Loss of access to our fishing grounds is far from our only concern but operating costs for a fishing enterprise has been rising due to inflation, bait prices, and fuel prices now adding the cost of extra travel to other fishing areas, loosing the most lucrative fishing areas, and possibly an extra cost for monitoring technology could degrade the small profit margins we operate under. Our fishermen will be forced to make a decision about whether to participate in a particular fishery or not based on operating costs. This could result in a loss of seasonal jobs for our community and income for our harvesters.
- Marine noise regulations are years away from being implemented. Hopefully by the time construction activities begin we will have marine noise regulations enforced in Canadian waters. The hydrographic survey vessels and technology should also be required to meet maximum noise limit thresholds imposed to protect marine mammals before they begin any field work in Canadian waters.
- Should multiple wind farm projects have construction phases happening simultaneously? Or should they stagger their construction timelines to give mammals an area where they can escape the noise impacts?
- Construction of turbines should not occur during sensitive times of the year, who gets to identify those times of the year? Who gets to have input on when they start construction?
- We were not satisfied with the process used and the request to DFO regarding identifying cumulative effects for the RA committee since DFO's framework is still being developed.
- We believe the Impact Assessment agency's independent committee's directives have been compromised or circumvented. GCIFA were told by the committee that areas were expanded because of unexpected substrate parameters but the final draft mentioned a letter submitted to the committee by the Ministers that directed them to identify more area for renewables. Perhaps this was related to the substrate or maybe it was also influence from developers who want cheaper operating costs by having a lease closer to shore. A transparent process would have complete disclosure of said letter uploaded onto the impact assessment agency's website for public view. We searched but could not find this document.
- The RA committee were supposed to identify enough marine space for 5GW of renewable energy. GCIFA was informed that the 6 preidentified PFDA's would be reduced in size to accommodate the 5GW which equaled approx. 2,000km<sup>2</sup> of ocean space.
- A great document which highlights other fishing industries experiencing the same impacts as Nova Scotia. Spatial Squeeze in Fisheries: Final Report, June 2022. ABPmer, (2022). Spatial Squeeze in Fisheries, Final Report, ABPmer Report No. R.3900. A report produced by ABPmer for NFFO & SFF, June 2022.
- How is the fishing industry a secondary constraint? Can you imagine, a man looking to purchase land for farming purposes and selecting all the fertile lands first, disregarding

whether that land is for sale or not, and whether someone already uses it, not owning the land, and making decisions first about the cost of materials and taxes, then considering someone already lives there as a secondary constraint? Completely backwards method of conducting marine spatial planning.

- Eastern Shore PFDA has now been renamed French Bank. This new PDA is over twice the area that was identified in the interim report. We, the fishing industry through NSFAEE identified an area just 10km farther offshore and to the left of the pipeline corridor as a low conflict area. This was to our detriment. Now this area has been swallowed up by the French Bank PDA and we shot ourselves in the foot by even participating in this process. We sent information to the RA committee detailing a sustainable and expanding halibut fishery with landings highlighted on the DFO Atlas just north of the "Eastern Shore PFDA" It seems this information was ignored. It should have protected that area from being identified as a potential place for a renewable energy project. This high fishing area was not identified as a potential development area in the interim report. It is a new marine space that has been identified in the final draft report. High halibut and snow crab landings that we were trying to protect, were not within a PFDA but were just outside the boundary. Now ARE inside the new PDA of French bank. GCIFA is disappointed our input was disregarded.
- We feel the fishing industry should have refused to participate in this engagement process and we regret having spent hundreds of hours of our resources on this file. Our input and feedback fell on deaf ears. The Ministers voices are clearly louder and more important than the fishing industries who have provided and still remain the main economic driver of the economy in this province.
- GCIFA have not benefitted from this engagement process and actually feel betrayed, misled and deceived.
- We are pleased to see the Emerald bank PDA identified as portions of this area are closed to fishing and has been identified as a low conflict area. The unused portion of this ocean space can accommodate more than 5 GW of renewable energy projects therefore there is no need to identify other ocean spaces and disrupt the fishing industry from one end of the province to the other. If one of the goals is in fact to minimize conflict with other ocean users, placing the 5 GW in this one PDA may be a way to do that.
- Recommendation T2-6: "Establish targeted immigration and recruitment programs to attract foreign specialists." This province is experiencing a housing crisis. Small coastal communities have been affected as well as the larger cities. Small coastal communities for the most part do not have apartment buildings and have very limited housing options. We hope our provincial government as well as municipalities do their part to prepare for the offshore wind construction phases, which would create most of the jobs associated with this new industry with respect to housing temporary or permanent workers in areas close to the port activity and renewable energy sites. Our coastal communities continue

to struggle to recruit healthcare workers due to our lack of housing options. Otherwise, economic spin-offs will go to other counties that have the aforementioned services.

- Our suggestions about how to decrease the previous PFDA's has been included in the draft final report. We are glad that our advice is in the final RA draft. We hope this information is considered when determining where leases will be designated within a PDA. We wonder who will have input on where these leases are placed....
- A buffer surrounding high fishing areas was suggested by NSFAEE and GCIFA to protect the fish stocks and our livelihood on the edges of PFDA's. This advice does appear in the draft, which is great. Now that the boundaries of the PDAs have changed, we will have new advice as to how to avoid high fishing areas within and around the new PDAs. We do not have the time to investigate thoroughly our activity within these new areas. Therefore, we cannot comment on how to divide them up at this time. Fishing industry input is expected on future discussions regarding where leases should be placed within a PDA. It is worth noting that from the DFO commercial landings data layer on the Atlas, (which does not highlight all fishing activity) it displays high fishing activity all along the northeastern corner of the French Bank PDA. This PDA runs along the 25km buffer for a distance of over 40 km from Sonora to New Harbour, NS. This will affect coastal communities that encompass this stretch of coastline, commercial fishermen within these communities and also commercial fishermen from other areas of Nova Scotia that travel east/west to fish their groundfish quotas and snow crab licenses in these coastal waters. A wide scope must be used to assess fishermen's impacts. A conversation with local fishermen from New Harbour or Goldboro will not suffice as other fishermen who do not reside within the project area will be impacted. GCIFA will continue to monitor our fishing activity within the four PDAs closest to our coast.
- It would seem other industries such as DND are not willing to incur extra costs to use ocean space farther away from their home base of Halifax. It is not the job of other industries such as the military to assess impacts of other ocean users, but we did expect respect and consideration from our military for our harvester's way of life, which has held up the economy in this province for decades. DND would rather coastal communities suffer rather than moving naval exercises to the west or east. The military are not fixed to a specific bottom type like the commercial fishing industry is.
- Below are the recommendations suggested by GCIFA in our first submission to the RA:
  - We need a framework for mitigating impacts for commercial and recreational fishers.
  - We need community benefits guidelines
  - We need an EA process that deals with cumulative impacts for surveys, construction, increased vessel traffic, infrastructure both marine and land based.
  - We need documents on best practices, setting threshold noise levels, lessons learned from other countries etc.

- We need fisheries liaison groups/board/committees to deal with project specific fisheries interactions and communications between industries reps and renewable energy companies.

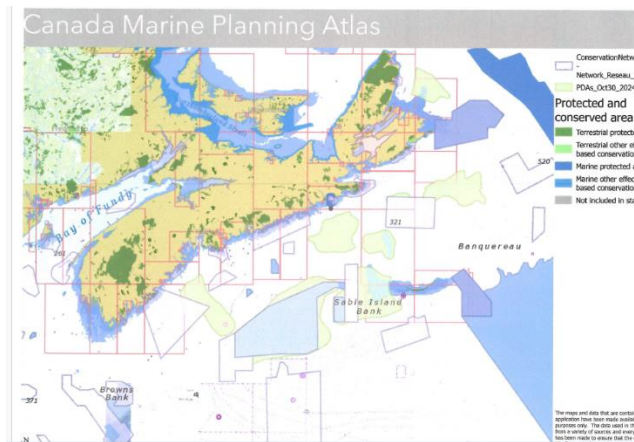
We are happy to see many of these recommendations in the final draft of RA report.

- In the past our municipality has taken the reins when it comes to community benefits packages from economic development. For example, a financial incentive was offered from the proponent to their employees to encourage new home purchases within the county. GCIFA has no information regarding how beneficial this 'community benefit' was or if it did not materialize the benefits that were expected. A project being years away from operation has resulted in the delay of any benefit coming to fruition. This could also happen with offshore wind projects, with millions of government money being spent without the final investment decision coming from proponents could equal a large waste of taxpayer dollars.
- Page 21 of the final draft report. Socio-economic Impacts. "The committee has struggled to adequately identify what the benefits and disadvantages of offshore wind development may be for Nova Scotia." Nova Scotians deserve to know before we jump in with both feet. Taxpayers should have knowledge of the government investments required and the benefits to residents of this province. These benefits and costs should be known by now, they should be easily assessable to the public. A small province with one million people's clean energy needs are substantially small comparatively to other provinces and states. The billions of dollars of financial benefit of producing clean energy for other countries and Provinces/States should benefit all Nova Scotians in many ways, the least of which is temporary construction related jobs. If foreign companies want to profit off our natural resources, they should be required pay a hefty levy or tax. Our government and the energy companies are risking destroying the integrity of our ocean to produce energy for other nations. Nova Scotians will take all the risk and could see no benefits.
- GCIFA recommends all port renovations, upgrades and new infrastructure required for this new industry be required to file documents with the federal Impact Assessment Agency for full federal environmental assessments.
- Coastal communities rely on wild caught fisheries to provide economic prosperity. Having no academic institution in Guysborough County; no post secondary training institution whatsoever in Guysborough County could exclude our residents from benefitting from new training and ultimately entering the workforce related to offshore renewable energy sector. How can NRCAN fix this, where are our politicians on this topic, Municipality of the District of Guysborough? GCIFA request a number of seats be reserved for coastal communities adjacent to any wind farm project with a special attention to mariners who are/were employed in seasonal fishing employment positions. We have large numbers of seasonal employment in Guysborough County. This

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results in a high unemployment rate compared to other counties in Nova Scotia. If this new economic development can offer employment during closed fishing seasons, then that would be a positive impact for our communities.

- The image below is a map of the conservation network areas proposed by Fisheries and Oceans Canada and the eight potential development areas for renewables. If our harvesters are going to be continue participating in wild caught fisheries we need consideration for our workspace. We need to be afforded the respect, time and resources for adequate consultations on these recent PDAs. We currently have no idea where energy leases will be offered within these large PDAs. Bids for energy leases could be announced by the CNSOEB in the coming months. This is a colossal concern for our harvesters.



We would like to thank the members of the RA Committee for their devotion to this directive. We appreciate all the extra effort the committee has shown to encourage consultations with the fishing industry.

Sincerely,

Melinda Cole, Biologist

Virginia Boudreau, Executive Director

Ken Snow, President

Guysborough County Inshore Fishermen's Association

Canso, Nova Scotia