First, I want to express my gratitude for your hard work and, more importantly, your commitment to community engagement on this project. The efforts you are making are positively shifting perceptions of "Government Trust," and this deserves recognition.

I also acknowledge the importance and seriousness of your role. You are tasked with establishing the framework for a new industry in Canada, one that will deliver green energy to Nova Scotia, Atlantic Canada, and the world. This energy paradigm shift will be the cornerstone of Nova Scotia's, Atlantic Canada's, and Canada's green energy future.

My name is **Kevin MacEachern**, a resident of Richmond County, Nova Scotia, and a community volunteer with 40 years of experience, primarily in community economic development. Over the years, I have taken on various roles, giving me a unique perspective.

Currently, I hold the following positions:

- Board Chair of the YMCA of Cape Breton
- Co-Chair of the Atlantic YMCA Chairs Network
- Treasurer of the Strait Area Chamber of Commerce
- Member of the Town of Port Hawkesbury Development Advisory Committee
- Founding (and former) member of the Strait of Canso Offshore Wind Task Force
- Chair of the Port Hawkesbury Food Bank Society

This statement reflects my personal views and has not been endorsed or reviewed by any organization with which I am affiliated.

Context for My Position

To provide context for my position, I will outline the high-level roles and responsibilities of the Government, Regional Assessment Committee, Canadian Nova Scotia Offshore Energy Board (CNSOEB), lease process, and developers in offshore wind development.

The Cooke Aquaculture Environmental Assessment as a Best Practice

When developing new documents or processes, I often look to examples of best practices from other sectors or jurisdictions. Fortunately, Nova Scotia already has a great example in the Cooke Aquaculture Environmental Assessment.

This assessment involved a multi-year, transparent process to evaluate aquaculture sites across Nova Scotia, including in Chedabucto Bay. Ultimately, the project was denied because the company failed to provide sufficient data proving it would not harm the environment or fisheries.

This serves as an excellent model: a rigorous, multi-year environmental assessment informed the outcome based on credible, transparent data.

Roles and Responsibilities

Government's Role in Economic Development

1. Establish a clear, transparent process for conducting multi-year, unbiased environmental, social, and sustainable economic impact assessments.
2. Uphold democratic principles, ensuring everyone has the opportunity to use their talents and resources to prosper.
3. Avoid "picking winners and losers."

Regional Assessment Committee's Role

Develop a transparent framework to guide the CNSOEB and Federal and Provincial Ministries in establishing clear rules and regulations for evaluating the viability and approval of offshore wind projects, while ensuring that no conditions predetermine 'winning' or 'losing' areas.

Canadian Nova Scotia Offshore Energy Board's Role

1. Establish and enforce rules and regulations for offshore wind development.
2. Ensure compliance with these rules and regulations.
3. Base project approvals on environmental assessment data.

Offshore Wind Lease Process

1. Grant seabed rights (submerged land licenses) for specific areas to conduct multi-year environmental, social, and economic assessments.
2. Determine project viability based on assessment outcomes.
3. Issue construction permits (typically five years after granting the initial license for studies).

Developer's Role

1. Conduct detailed desktop and field studies to evaluate potential offshore wind project sites.
2. Assess environmental, social, legal, economic, geological, and other risks, potentially canceling or modifying projects based on findings.
3. Cover all costs of multi-year environmental assessments and provide the resulting data to CNSOEB for evaluation.
4. Invest significant capital (approximately CAD 5 billion per GW) upon project approval and permitting.

Offshore Wind: A Win-Win-Win Outcome

During my time with the Strait Area Offshore Wind Task Force, I engaged with over a dozen organizations, developers, engineers, designers, consultants, rights holders, government officials, fishing groups, and citizens.

The consensus was clear: offshore wind must achieve a **win-win-win** outcome:

- A win for communities and rights holders
- A win for individual and special interest groups
- A win for developers

Achieving this requires a transparent, multi-year assessment process that prioritizes environmental, social, and economic sustainability.

The Need for Green Energy and Offshore Wind

One critical point that deserves greater emphasis is the growing demand for green energy and the vital role offshore wind will play in meeting it.

Canada has committed to ensuring all new passenger and commercial vehicles sold by 2035 are green-fueled. This commitment represents a monumental shift in energy and economic paradigms.

Using publicly available data and industry formulas, the Strait of Canso Offshore Wind Task Force estimated future green energy demand:

- Nova Scotia alone will need 5 GW of power to replace fossil-fueled vehicles.
- New Brunswick and Prince Edward Island will require another 5 GW.
- Canada as a whole will need 200 GW, and the United States 2,000 GW.

These figures were confirmed by NRCan Director General Andre Bernier and validated by Nova Scotia officials, including Natural Resources Minister Tory Rushton and Deputy Minister David MacGregor.

Currently, Nova Scotia consumes less than 3 GW of power. Offshore wind is the only viable option to meet future demand. With some of the world's best wind and seabed conditions, Nova Scotia has the technical potential to produce over 900 GW (Appendix 1).

By developing just **5%** of this potential (45 GW), Nova Scotia could position itself as a global leader in green energy. Achieving this would require only **2.25%** of the 300,000 sq km regional study area. Leasing just 5 GW today would use a mere **0.25%** of this area, making a win-win-win solution achievable.

Failing to get this right risks either an energy crisis worse than the 1970s or a reversal of Canada's 2035 green-fueled vehicle policy.

Offshore Wind Companies: Risk Mitigation and Global Reputation

Offshore wind companies are inherently risk averse. They only invest in projects that meet the highest standards of **credibility**, **transparency**, and **sustainability** to protect their global reputation.

Their rigorous, multi-layered decision-making processes prioritize:

- Credibility
- Capacity
- Competency
- Sustainability
- Transparency
- Trust

Recent failures in the United States and Europe highlight the consequences of poor planning. For example, Denmark's largest-ever offshore wind tender received no bids due to soaring costs and perceived risks, despite Denmark being a global leader in wind energy.

Offshore wind companies avoid regions that oversimplify processes, as this signals a lack of understanding of project complexity. A robust, credible framework is essential to attract investment.

The most recent example of challenges in offshore wind development comes from **Denmark's Largest-Ever Offshore Wind Tender**, which received no bids, as reported by BNN Bloomberg. Below are key excerpts from the article:

> "(Bloomberg) – Denmark received no bids in its largest-ever wind power tender, a major blow to European efforts to boost renewable energy and slash fossil-fuel demand."

The Danish Energy Agency didn't receive a single offer by Thursday's deadline in the tender to develop three offshore wind farms, it said in a statement. It will now initiate a dialogue with the market to find out why.

Denmark, the birthplace of offshore wind, is seeking to triple its capacity by the end of the decade. It already boasts the world's largest share of wind in its power grid. But that legacy hasn't been enough to overcome the soaring costs that have stunted growth of the technology that was once one of the fastest-growing sources of green power.

"The Danish offshore wind flop should be a surprise to no one," Esben Hegnsholt, managing director at Boston Consulting Group in Copenhagen, wrote in a post on LinkedIn. "Like the naked Emperor, the only ones that seem surprised are the protagonists themselves, politicians and opinion makers visibly far from reality of the industry."

Offshore wind has broad political support in Denmark, and Europe has pinned its climate and energy security ambitions on a rapid expansion of the technology. Between the European Union and the UK, countries aim to have some 150 gigawatts of capacity by the end of the decade, more than quadruple today's level. The failure of the Danish tender puts that goal further out of reach, and similar struggles to attract new investment in neighbouring Sweden show it's not an isolated case."

This example illustrates that offshore wind development hinges on more than political will or ambition, it requires **robust planning**, **clear frameworks**, and **trust in the region's development processes**.

Offshore Wind Companies' Investment Criteria
Offshore wind companies approach investments with a multilayered, multiyear checklist that ensures every project meets the highest standards of **Credibility**, **Capacity**, **Competency**, **Transparency**, and **Trust** in the region. These companies are not looking for shortcuts or overly simplified processes; instead, they require a clear and comprehensive regulatory and permitting framework to mitigate risks for their billion-dollar investments.

An overly simplistic or poorly defined process is often a red flag, as it indicates the region may not fully understand the complexity of offshore wind development. A lack of rigour can jeopardize not only the success of individual projects but also the international reputation of the companies involved.

The Committee's Role in Establishing Trust

In this Committee's Terms of Reference, Section M outlines a detailed analysis of environmental, health, social, and economic components to consider. These include:

1. Air Quality and Greenhouse Gases (GHGs)
2. Marine Fish and Fish Habitat (including species at risk)
3. Avifauna (including birds, bats, and associated species at risk)
4. Marine Mammals and Sea Turtles (including species at risk)
5. Protected and Special Areas (established and proposed)
6. Indigenous Communities, Activities, Interests, and Rights
7. Fisheries and Other Ocean Uses
8. Visual Aesthetics / Viewscapes and Acoustic Environments
9. Physical and Cultural Heritage (including structures, sites or things of historical, archaeological, paleontological, or architectural significance)
10. Health
11. Communities
12. Economy

These criteria align closely with the high standards offshore wind companies expect when evaluating potential investment regions. However, many additional factors, such as grid interconnection feasibility, supply chain logistics, and future technological scalability, are also essential for companies to proceed confidently.

Learning from the Past Decade of Offshore Wind Development

The past 10 years of offshore wind development have demonstrated significant environmental and economic benefits when paired with robust regulatory processes:

1. **Environmental Monitoring and Innovation**:

   • Projects have incorporated advanced monitoring tools, such as acoustic sensors and AI-based data analysis, to protect marine life during construction and operation.

   • For example, the Hornsea Project in the UK utilizes predictive modeling to avoid disruption to marine mammal migration routes.

2. **Environmental Protection:**

   • Many wind farms, such as the Dutch Borssele wind farm, have enhanced marine biodiversity by transforming turbine foundations into artificial reefs.

   • Stringent noise reduction measures during pile driving have significantly mitigated impacts on sensitive marine species.

3. **Climate and Economic Benefits**:

   • Offshore wind projects have displaced millions of tons of CO2 emissions, helping countries meet their climate goals.

   • Wind farms often create protected zones for marine life, contributing to ecosystem recovery by limiting human activity like commercial fishing.

4. **Public Trust through Transparent Processes**:

   • Projects like Block Island in the US have gained public trust by ensuring full transparency during environmental assessments and stakeholder engagement.

The Committee has an opportunity to establish Nova Scotia as a global leader in offshore wind development by focusing on these best practices. By setting clear, consistent, and rigorous standards based on global lessons, the region can attract investment, promote sustainability, and strengthen its reputation as a reliable partner in the global energy transition.

The example of Denmark's tender failure serves as a cautionary tale: **to succeed, offshore wind development must prioritize trust, transparency, and a comprehensive understanding of the industry's complexities**.

Regional Assessment Document: Language Matters

Language in the Regional Assessment document plays a critical role in building trust. Unfortunately, some statements may unintentionally harm trust-building efforts.

For example:

• "*No offshore wind development is being recommended within 25 km of the coast.*"

• "*The Committee believes it would be inappropriate for governments to exempt any offshore wind projects from an Impact Assessment process until the effects… are better understood.*"

No credible offshore wind company would request an exemption from environmental assessments. By avoiding arbitrary restrictions like "25 km from the coast," the Committee can foster trust and ensure decisions are based on multi-year, unbiased assessments.

Recommendations for the Committee

While reviewing the Regional Assessment document, I identified several statements that could inadvertently undermine the trust and credibility essential to attracting offshore wind investments:

1. "**No offshore wind development is being recommended within 25 km of the coast.**"

This statement projects a lack of confidence in Canada and Nova Scotia's ability to conduct a robust and transparent Environmental Assessment (EA) and is inconsistent with Global Best Practices. Globally, offshore wind projects within 25 km of the coast have proven to coexist with marine ecosystems, coastal communities, and other ocean users when supported by stringent environmental monitoring and protection measures.

2. "**The Committee believes it would be inappropriate for governments to exempt any offshore wind projects from an Impact Assessment process until the effects…are better understood.**"

While this statement may aim to reassure the general public, it inadvertently implies that credible offshore wind companies might seek exemptions from proper assessments, a notion that is unlikely. At a minimum, I recommend removing the phrase "until the effects are better understood", as it undermines confidence in the ability to manage the process effectively.

Recommended Language

I suggest the Committee adopt the following language:

"The Committee recommends a clear and transparent, multiyear, and unbiased environmental, social, and sustainable economic impact assessment for every offshore wind development, in alignment with the components listed in Part M of the Terms of Reference."

Conclusion

It is evident that special interest groups are advocating to protect specific areas for their particular purposes. While this is reasonable and appropriate, their influence should not preemptively shape this process. Their concerns should be addressed during the Environmental Assessment stage, if and when such assessments are conducted, not at this preliminary stage.

It is entirely appropriate to designate all Marine Protected Areas and Critical Habitat Areas as non-developable. It is also reasonable for the Committee to identify areas it considers more favourable for development. However, it is neither reasonable nor responsible for the Committee to exclude areas based on current Technical or Administrative Constraints.

Over the past decade, offshore wind projects have demonstrated significant advancements in environmental stewardship:

1. **Environmental Monitoring**:

Offshore wind developers now employ state-of-the-art monitoring technologies, such as underwater acoustic sensors, remote sensing systems, and aerial surveys, to assess and mitigate impacts on marine life. For example:

- **In Europe**, developers have successfully tracked and minimized noise impacts on sensitive species such as harbour porpoises during construction phases.
- **In the United States**, extensive bird migration studies and post-construction monitoring at the Block Island Wind Farm (Rhode Island) have shown minimal disruption to avian species.

2. **Environmental Protection:**

Offshore wind projects now integrate design and construction practices to protect marine habitats. Key innovations include:

- **Turbine foundations as artificial reefs**: In areas like Denmark's Horns Rev and Belgium's Thornton Bank, turbine bases have created thriving habitats for fish and shellfish, leading to increased biodiversity.
- **Dynamic cable protection systems** that minimize seabed disturbances, ensuring critical habitats remain undisturbed during operations.

3. **Environmental Benefits of Offshore Wind Development**:

Beyond careful monitoring and mitigation, offshore wind farms have been shown to deliver broader environmental benefits:

- **Reduction in greenhouse gas emissions**: Offshore wind farms are now among the most effective tools in combating climate change, displacing millions of tons of carbon dioxide annually.
- **Repopulation of marine species**: Studies in the North Sea have observed increased populations of certain fish species due to the exclusion of large-scale fishing within wind farm zones, which effectively serve as de facto marine sanctuaries.
- **Decarbonizing marine industries**: Offshore wind projects often enable the electrification of ports and shipping infrastructure, further reducing ocean-based emissions.

By relying on evidence-based Environmental Assessments and adopting these proven best practices, Canada and Nova Scotia have an opportunity to responsibly develop offshore wind projects near the coastline while safeguarding ecosystems and meeting environmental objectives.

Instead of arbitrarily excluding areas within 25 km of the coast, the Committee should promote a rigorous Environmental Assessment process that builds trust and aligns with global standards. Nova Scotia has the chance to not only lead in offshore wind energy production but also set benchmarks for sustainable and environmentally conscious development.

"Trust the Process"

I am reminded of the day Cooke Aquaculture was denied approval to develop projects across Nova Scotia. While the decision was a disappointment to many, it was widely respected because it was viewed as the result of a transparent, data-driven process. My contacts in the fishing industry regarded the Cooke Aquaculture decision as credible and grounded in evidence.

For this process to achieve the same level of trust, the Committee must demonstrate faith in the Environmental Assessment process. Arbitrary boundaries should not be set; instead, high standards based on Global Best Practices should guide the process.

Nova Scotia and Canada have a unique opportunity to emerge as global leaders in offshore wind, not just in energy production but also in green energy manufacturing, trade, academic excellence, and the establishment of industry best practices.

To realize this potential, the Committee's focus must remain on five pillars: **credibility**, **capacity**, **competency**, **transparency**, and **trust**.

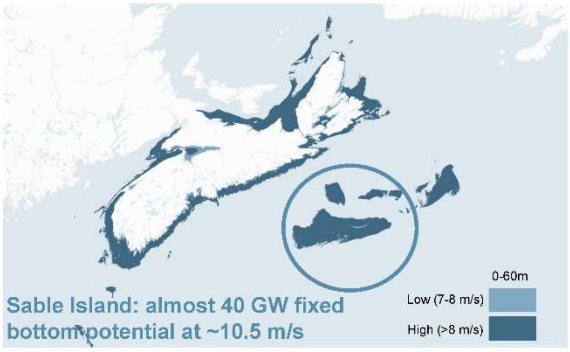
Appendix 1

2. WHY NOVA SCOTIA

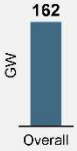
Nova Scotia has a very large technical potential for offshore wind: 162 GW fixed-bottom and 776 GW floating

AEGIR

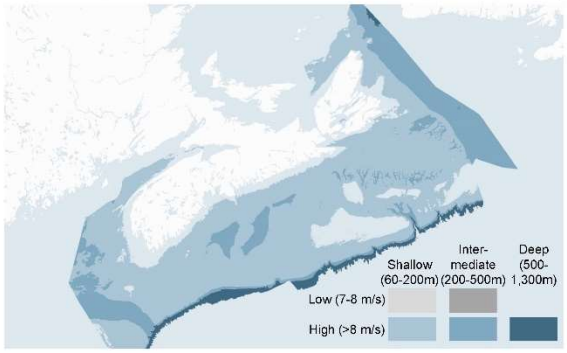
Technical potential for fixed-bottom offshore wind (162 GW)



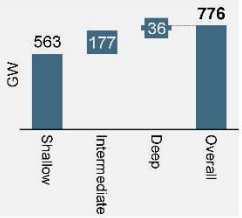
- Near shore areas are well-suited for fixed-bottom offshore wind as depths are below 60m
- A unique feature is the region around Sable Island where there is relatively shallow water with high wind speeds



Technical potential for floating offshore wind (776 GW)



- Most areas suited for shallow floating offshore wind have high potential (defined as wind speeds above 8 m/s)
- Coastal areas are well suited for shallow-floating wind (60-200m)



Source: Aegir database; GEBCO (2020); Global Wind Atlas

Appendix 2
Here's a list of 25 offshore wind farms located less than 25 kilometers from shore, with details about construction dates, estimated distances from shore, and capacities where available:

Europe

1. Middelgrunden (Denmark)
    - Construction Date: 2000
    - Distance from Shore: ~3 km
    - Capacity: 40 MW
2. North Hoyle (United Kingdom)
    - Construction Date: 2003
    - Distance from Shore: ~7 km
    - Capacity: 60 MW
3. Rhyl Flats (United Kingdom)
    - Construction Date: 2009
    - Distance from Shore: ~8 km
    - Capacity: 90 MW
4. Lillgrund (Sweden)
    - Construction Date: 2007
    - Distance from Shore: ~10 km
    - Capacity: 110 MW
5. Horns Rev 1 (Denmark)
    - Construction Date: 2002
    - Distance from Shore: ~18 km
    - Capacity: 160 MW
6. Horns Rev 2 (Denmark)
    - Construction Date: 2009
    - Distance from Shore: ~20 km
    - Capacity: 209 MW
7. Thorntonbank Phase 1 (Belgium)
    - Construction Date: 2009
    - Distance from Shore: ~23 km
    - Capacity: 30 MW
8. Belwind Phase 1 (Belgium)
    - Construction Date: 2010
    - Distance from Shore: ~17 km
    - Capacity: 165 MW
9. Burbo Bank (United Kingdom)
    - Construction Date: 2007
    - Distance from Shore: ~7 km
    - Capacity: 90 MW
10. Gunfleet Sands 1 & 2 (United Kingdom)
    - Construction Date: 2010
    - Distance from Shore: ~7 km
    - Capacity: 172 MW
11. Robin Rigg (United Kingdom)
    - Construction Date: 2010

- Distance from Shore: ~12 km
- Capacity: 180 MW

12. Nysted (Rødsand 1) (Denmark)
    - Construction Date: 2003
    - Distance from Shore: ~10 km
    - Capacity: 165 MW
13. Kemi Ajos (Finland)
    - Construction Date: 2008
    - Distance from Shore: ~5 km
    - Capacity: 30 MW
14. Alpha Ventus (Germany)
    - Construction Date: 2010
    - Distance from Shore: ~23 km
    - Capacity: 60 MW
15. Walney Phase 1 (United Kingdom)
    - Construction Date: 2011
    - Distance from Shore: ~14 km
    - Capacity: 184 MW

Asia

16. Donghai Bridge Wind Farm (China)
    - Construction Date: 2010
    - Distance from Shore: ~8 km
    - Capacity: 102 MW
17. Jiangsu Rudong (China)
    - Construction Date: 2012
    - Distance from Shore: ~15 km
    - Capacity: 150 MW
18. Fukushima Forward (Japan)
    - Construction Date: 2013 (Pilot)
    - Distance from Shore: ~20 km
    - Capacity: 14 MW
19. Changhua Demonstration (Taiwan)
    - Construction Date: 2016
    - Distance from Shore: ~10 km
    - Capacity: 8 MW
20. Yunlin Offshore Wind Farm (Taiwan)
    - Construction Date: 2023 (partial completion)
    - Distance from Shore: ~8 km
    - Capacity: 640 MW

North America

21. Block Island (United States)
    - Construction Date: 2016
    - Distance from Shore: ~5 km
    - Capacity: 30 MW
22. Vineyard Wind 1 (United States)
    - Construction Date: 2024 (expected)
    - Distance from Shore: ~24 km
    - Capacity: 800 MW

More Europe

23. Scroby Sands (United Kingdom)
    - Construction Date: 2004
    - Distance from Shore: ~2.5 km
    - Capacity: 60 MW
24. Egmond aan Zee (Netherlands)
    - Construction Date: 2006
    - Distance from Shore: ~10 km
    - Capacity: 108 MW
25. Teesside (United Kingdom)
    - Construction Date: 2013
    - Distance from Shore: ~1.5 km
    - Capacity: 62 MW

Here is a list of 25 offshore wind farms located more than 25 kilometers from shore, including details on construction dates, estimated distances, and capacities:

Europe

1. London Array (United Kingdom)
- Construction Date: 2013
- Distance from Shore: ~30 km
- Capacity: 630 MW
2. Greater Gabbard (United Kingdom)
- Construction Date: 2012
- Distance from Shore: ~26 km
- Capacity: 504 MW
3. Sheringham Shoal (United Kingdom)
- Construction Date: 2012
- Distance from Shore: ~27 km
- Capacity: 317 MW
4. Dudgeon Offshore Wind Farm (United Kingdom)
- Construction Date: 2017
- Distance from Shore: ~30 km
- Capacity: 402 MW
5. Hornsea One (United Kingdom)
- Construction Date: 2020
- Distance from Shore: ~120 km
- Capacity: 1,218 MW
6. Hornsea Two (United Kingdom)
- Construction Date: 2022
- Distance from Shore: ~89 km
- Capacity: 1,386 MW
7. Dogger Bank A (United Kingdom)
- Construction Date: 2023 (partial operation)
- Distance from Shore: ~130 km
- Capacity: 1,200 MW (per phase)
8. Borssele 1 & 2 (Netherlands)
- Construction Date: 2020
- Distance from Shore: ~30 km
- Capacity: 752 MW

9. Borssele 3 & 4 (Netherlands)
- Construction Date: 2021
- Distance from Shore: ~25-30 km
- Capacity: 731 MW

10. DanTysk (Germany)
- Construction Date: 2014
- Distance from Shore: ~70 km
- Capacity: 288 MW

11. Gode Wind 1 & 2 (Germany)
- Construction Date: 2017
- Distance from Shore: ~45 km
- Capacity: 582 MW

12. Kriegers Flak (Denmark)
- Construction Date: 2021
- Distance from Shore: ~30 km
- Capacity: 604 MW

13. Arkona (Germany)
- Construction Date: 2019
- Distance from Shore: ~35 km
- Capacity: 385 MW

14. Wikinger (Germany)
- Construction Date: 2018
- Distance from Shore: ~35 km
- Capacity: 350 MW

15. Anholt (Denmark)
- Construction Date: 2013
- Distance from Shore: ~20-25 km
- Capacity: 400 MW

16. Global Tech 1 (Germany)
- Construction Date: 2015
- Distance from Shore: ~90 km
- Capacity: 400 MW

17. Nordsee One (Germany)
- Construction Date: 2017
- Distance from Shore: ~40 km
- Capacity: 332 MW

18. Baltic 2 (Germany)
- Construction Date: 2015
- Distance from Shore: ~32 km
- Capacity: 288 MW

19. Thanet (United Kingdom)
- Construction Date: 2010
- Distance from Shore: ~30 km
- Capacity: 300 MW

20. Riffgat (Germany)
- Construction Date: 2014
- Distance from Shore: ~15-26 km
- Capacity: 113 MW

Asia

21. Formosa 1 (Taiwan)

- Construction Date: 2019
- Distance from Shore: ~30 km
- Capacity: 128 MW

22. Fukushima Forward (Japan)
- Construction Date: 2013 (Pilot)
- Distance from Shore: ~50 km
- Capacity: 14 MW

23. Changhua Phase 1 (Taiwan)
- Construction Date: 2021
- Distance from Shore: ~35 km
- Capacity: 109 MW

24. Ishikari Bay New Energy (Japan)
- Construction Date: 2022 (Pilot stage)
- Distance from Shore: ~50 km
- Capacity: 112 MW

25. Huaneng Rudong (China)
- Construction Date: 2021
- Distance from Shore: ~26 km
- Capacity: 300 MW

Appendix 5

Below are more detailed comments on the report.

Comments to the RA report.

Page 315:

Legislation requires consultation with **Indigenous communities**, **fisheries groups** and **local communities**, which the Committee supports and recommends be initiated as early as possible to provide the greatest chance of success for all those involved.

Comment: what about Developers, shouldn't they be part of the ones to be consulted?

Page 323:

These are concerns that are shared by the State of Maine.The latter has announced the development of a floating OSW test site. It is therefore recommended that discussions with the State of Maine be initiated to enable elements of shared research to be undertaken at their test site.

Comment: the above statement assumed Nova Scotia and Canada has no capacity, or no interest, in developing our own Test Site.

Page 324:

Some excellent preparatory work is underway, but **more needs to be done** on multiple fronts; from the perspective of being able to finance what will be required in the areas of ports and social infrastructure, to ensuring that the province achieves good outcomes in terms of economic benefits capture and labor force engagement, and **in helping communities better understand** what it all

means and engendering the kind of support and social license that will ultimately be a strong indicator of a successful outcome.

Comment: the report does not indicate who is responsible for doing more.

Page 325:

1. Supply Chain box: Tier 1 Capacity. Let us align the new Research institutions with Supply Chain capabilities to be developed and then we will increase significantly the chances of success in a niche market. Clearly, environmental monitoring (devices, technologies, people) would be a winning for Nova Scotia and Canada. Perhaps some type of offshore service vessels.
2. Cement and Steel. Technologies around Cement and the raw material itself seems much more doable in Nova Scotia than Steel.

Page 327:

Some of the issues related to the lack of Tier 1 component manufacturing capability or the challenges of meeting the demand for steel and concrete have been briefly reviewed in section 8, as have some of the significant projected labour gaps.

Comment: the only Tier 1 component manufacturing capability feasible in Nova Scotia is foundations made of concrete. As for Tier 2, service vessels of a specific type should be a local industry, as well as Tier 3 products and services such as engineering, environmental, and other ancillary services, all in which Nova Scotia has potential to be worldwide leader, and its success in terms of social infrastructure is aligned with the local lifestyle.

Page 328:

It will also prepare communities and developers in advance for project impact assessments.

Comment: if the RA Committee recognized that each project will have its own project impact assessment, what then is the purpose of the 25 kilometers recommendation? If a proponent (Developer) identify an area and get a license to conduct studies, then find out that it is not feasible to get Environmental Approval, the project will not go ahead. That is the nature of the industry.

Page 330

… the rationale that led to the identification of the 25 km coastal buffer

Comment: this rationale assumes **incorrectly** that 100% of all Nova Scotia coastal areas are equally densely populated by Bats, etc. Is the RA Committee decision evidenced-based, or is it based in perceptions and put on paper to appease certain community groups?

Page 331:

The buffer zone boundary takes into consideration:

• the information received through the engagement process; one sided, from interested parties.

• presence of nearshore fisheries, e.g., lobster fishery, and the Indigenous FSC fisheries; Incorrect, lobster fishery and Indigenous FSC Fisheries occur almost entirely less than 5 kilometers from shore.

• potential (unidentified) coastal underwater Indigenous archeological sites; An assumption. This should not be used as an argument in this report. This should be a regulation within the Environmental Approval process, not here. This is exactly why Developers must conduct preliminary technical studies. This could happen beyond 25 kilometers as well.

• protection of viewscapes particularly from coastal national parks and heritage areas; Agreed, but viewscapes must be defined, not subjective.

• established marine shipping routes and areas of heavy vessel traffic; again, equally dense all across the coast of Nova Scotia?

• the presence of bats within approximately 25 km of shore, three species of which are listed already commented

as Endangered provincially and federally (see section 4.3.5) and

• protection of migratory and breeding habitat for birds. Same reasoning.

Page 331

This recommendation reflects a precautionary approach and serves as a proactive protection measure for sensitive areas in the early stages of a new industry where environmental and socio-economic impacts may not be fully understood.

Comment: Licenses are not given for construction but for conducting feasibility studies. If there is a case where a proponent suggest a Site, and during the next 4-5 years of environmental studies authorities find it more harming than beneficial, then there will not be license for construction. Protective measures for sensitive areas is already in our legal system. The precautionary approach recommended here seems more as an unnecessary generalization.

Page 332:

NS is at the beginning of what could well be a long relationship with OSW, and whom it chooses for 25+ year relationships will be of enormous consequence to the province and the overall success of the industry.

Comment: Nova Scotia could consider partnering at the highest level with other countries. Complement each other in terms of R&D, and bring in their expertise in Development and Finances. I can help in this regard, if requested.

Page 336:

Compensation should not be addressed through bid criteria or become the subject of a non-monetary bid criterion as part of the competitive leasing process.

Comment: this recommendation must be clarified. If implemented, it could be a major cause of problems. Developers need to know in advance the total costs associated with a project, otherwise, how can they set a price to power to be generated and sign contracts with their clients?

Page 341:

The Committee does not believe that given the emerging state of the OSW industry in Canada, and the lengthy research agenda required to properly characterize biophysical and socio-economic impacts, that the RA process is any substitute for a detailed site-specific project assessment.

Comment: no one in the industry is expecting not to conduct comprehensive impact assessments for each project. There are economic and technical reasons for conducting complete impact assessments.