

REGIONAL ASSESSMENT OF OFFSHORE WIND DEVELOPMENT IN NOVA SCOTIA
Comment Table: Summary of Comments for Draft Report Public Comment Period

The Draft Final Report for the Regional Assessment was released for a 50-day public comment period from October 31 to December 20, 2024. A total of 48 submissions were received, totaling over 800 comments. The RA Committee and Secretariat worked together to consider the comments received, and to revise the Draft Report, where applicable. The Final Report was submitted to Ministers on January 23, 2025 and has been posted to the Registry.

The following table summarizes all comments received and provides responses.

#	Comment	Committee Response
Section 1. Introduction		
1	NS Committee should also read the 800+ page NL report, to respect Two-Eyed seeing approach and to best consider any cumulative effects.	The Committee is aware of the NL RA Report; however, the process is separate from the NS RA process. As noted in section 2 (Approach) this Committee did consider the Two Eyed Seeing approach throughout the RA.
2	Important to include Newfoundland as part Mi'kma'ki and 7 Mi'kmaw Districts, not use colonial divisions. Major research on this topic is ongoing.	The groups in Newfoundland and Labrador were included in outreach throughout the NS RA. Many groups did not respond, and some indicated in their response that they would participate in the NL RA.
3	Need to add funding allocations to timeline	Funding allocation has been noted in the timeline graphic.
4	Timeline presented is reasonable based on our global OSW experience for an emerging market but may be optimistic relative to other major Canadian infrastructure projects. Agree that employment opportunities are tied to the need for infrastructure investment.	Noted.
5	While not specifically in the RA's Scope of Work, KMK would like to highlight the recent passing of Bill C-49 federally and Bill 471 within Nova Scotia. The passing of both Bills and the disappointing processes leading up to their passing undermine the work being completed by the RA Committees of Nova Scotia and Newfoundland & Labrador. We have two primary concerns with these pieces of legislation as they relate to the RAs specifically: 1) profound lack of coordination between the development of the Bills and the work on the RAs, despite the fact that they cover many overlapping topics such as compensation for impacted fishing communities. 2) the new pieces of legislation do not accord weight to these RAs or account for their recommendations within the planning process. This omission undermines and undervalues all the time and resources that have been dedicated towards the RAs, and it suggests that a compartmentalized approach is being followed by the various federal and provincial government departments working on offshore wind.	Noted.
6	Given the ongoing governance and reconciliation processes with First Nations, long-term collaboration with Mi'kmaq communities is vital. This approach aligns with the principles of reconciliation and supports sustainable development. It also promotes compliance with Canada's commitments under the United Nations Declaration on the	The Crown's Duty to Consult would be triggered if a decision is required (i.e. IAAC decision) that could potentially impact Constitutionally protected s.35 rights. An impact assessment and related IAAC policies would consider all these elements, including UNDRIP and reconciliation.

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	Rights of Indigenous Peoples (UNDRIP) and the federal UNDRIP Act. Thorough and meaningful consultation, accommodation, and the integration of Mi'kmaq knowledge systems into the decision-making processes are essential for achieving these objectives.	
7	Section 1.6 - T2-4 (pg. 33, 327) First call for bids to be issued in 2025 - We understand that the timeline provided can and will change. However, planning to start the bids in 2025 when we still do not know much of the potential impacts of the activity on the environment, is not adequate. Being proactive in the process will allow us to avoid a fiasco similar to the one on tidal energy in the Bay of Fundy.	While the Committee is aware of issues related to timelines, the proposed timeline for call for bids is determined by NRR and NRCan
8	Section 1.6 - Summary (pg. 18, 33) First turbines may be installed any time after 2030 - Did we consider meaningful consultation and the need to feel some of the data gaps when setting up these timelines? Same comment as above.	The Committee cannot direct the process of consultation to be done by governments. Under the federal government, the Crown's Duty to Consult would be triggered if a decision is required (i.e. IAAC decision) that could potentially impact Constitutionally protected s.35 rights.
9	Section 1.7 (pg. 35) - General comment #9: The report mentioned engagement with the Grand Council of the Seven Districts. Even though we recognize and appreciate the effort made by the Committee to engage the Grand Council, we want to clarify and restate that each district in Mi'kma'ki has its own autonomy and makes its own decisions. The opinions expressed by representatives of the Grand Council are not necessarily the opinions shared by all districts. Engaging the Grand Council does not replace nor stand for engagement and consultation with each Mi'kmaw community.	Noted.
10	Regulatory context (page 27): Suggest re-wording the bullet that reads “an authorization pursuant to the Fisheries Act for the harmful alteration, disruption, or destruction of fish habitat” and changing it to: “an authorization pursuant to the Fisheries Act for the death of fish and/or the harmful alteration, disruption, or destruction of fish habitat” and update the footnote to include section 34(1) of the Fisheries Act.	Edit made.

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Section 2. Approach		
339	Have you been getting much feedback from the Private Sector or Developers who are interested in NS? And how they feel about the lines drawn, whether they want to draw inside or outside these lines?	The Committee engaged with developers and industry organizations throughout the RA. Summaries of meetings are provided on the Registry.
340	(Pg. 45) Section 2.2.3 - What social criteria were included in the value mapping document?	Criteria defined in the value mapping document were specific to the Aegir report methodology.
341	(Pg. 46) Section 2.2.3 - How does the emphasis on economic value in the PFDA map align with the stated need to incorporate "other factors," and what specific factors should be prioritized in future analyses? Why does the PFDA map in the final report fail to reflect meaningful progress in addressing the acknowledged limitations and inclusion of non-economic constraints?	The Committee included both economic and non-economic constraints as part of the analysis for the identification of PDAs, and many recommendations speak to consideration of non-economic issues. Addressing limitations and determining prioritization of various non-economic factors will be an ongoing process and will be unique to each wind energy area and potential project site(s).
342	(Pg. 49) Section 2.3 - How will the RA address the issue of high compatibility scores being assigned in the absence of conflict data, especially for factors like fishing activity? In which part of the analyses should Indigenous fishing areas, MPAs, cultural values, and other socially significant factors be incorporated?	Criteria defined in the value mapping document were specific to the Aegir report methodology.
343	(Pg. 55) Section 2.6.4 - What benefits have been offered to the communities mentioned in the case studies, and are these benefits extended to local or Indigenous communities, and who holds responsibility for building the community capacity needed to manage the impacts of such growth effectively?	Detailed discussion on benefits to Indigenous and non-Indigenous communities will be explored as part of the individual project process. The Committee has also recommended that Community Benefits Agreements be used as a tool to be considered in bid criteria. Refer to section 10 (T3-3).
344	(Pg. 56) Section 2.6.5 - Are Mi'kmaq communities' perceptions and apprehensions regarding OSW development different from those of local fishers? - Are the "participants" referenced living on reserve lands, or do they represent broader local communities? - Does this indicate a disconnect between Mi'kmaq and local community perspectives on OSW projects?	The Committee did not ask Mi'kmaq participants if they were or were not living on reserve lands - engagement included meetings with Chiefs and Councils, information sessions at Indigenous communities, meetings with organizations representing off-reserve community members including Nova Scotia Native Council, MTI and MAPC, and open houses that were available to all participants. Specific comments from Mi'kmaq participants can be reviewed in the WWHSs which were reviewed by Mi'kmaq participants and posted to the Registry.

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345	<p>Meaningful engagement and participation of Indigenous people is critical to the long term equitable and sustainable development of this industry and should include:</p> <ul style="list-style-type: none"> • Engagement/participation and potential management/ownership of collected site data, particularly data related to cultural resources, and involvement in the assessment of proposed mitigation plans for any potential impacts. • Recognition of, and compensation for, all losses incurred including commercial fisheries, traditional fisheries, and cultural practices. • Participation in key decisions related to the development and regulation of the industry. <p>Equitable participation in economic benefits from development of the new sector through employment of Mi'kmaw people, contracting Mi'kmaw-owned businesses and investment in Mi'kmaw communities.</p>	Noted.
346	The Secretariat stated at the mentioned December 02, 2024, meeting that KMK comments on the draft would be dispositioned in a table after the fact. These comments, with responses, should be published with the document so that the concerns and process of dealing with the feedback received are transparent.	All comments received during the public comment period are documented in this table and will be posted to the Registry.
347	Given the emphasis the Secretariat has put on Indigenous involvement and the level of effort that was spent on public and Indigenous engagement, it is surprising that the last stage of this process is being rushed such that the committee only has a matter of weeks consider, integrate and update the Draft report based on the feedback received. This is not sufficient time for a fulsome consideration of the issues. We acknowledge that not all of the concerns or questions raised at this time can be resolved, however it would be a benefit for future assessments if these were identified and characterized.	Noted.
348	Section 2.2.5 (pg. 48) - NSFAEE report mentioned - Did you get any data from Indigenous fishers (Communal Commercial & FSC) to add to the proposed modelled maps and report from the NSFAEE map of fishing effort? We are concerned that the data provided does not represent adequately the fishing activity occurring in the area.	The Committee did not receive specific feedback from Indigenous fishers on CC or FSC fisheries. KMKNO did provide information on fisheries during the engagement process and in their report. Additional information on CC and FSC has been added to the final version of the Report (see section 4.5)
349	Section 2.4 (pg. 51) - The Minister expected larger areas to be identified - The PDA changed a lot in size and number from the interim report to that draft final report. We understand that geophysical characteristics were considered after publishing the interim report. However, more detail explaining the reasons for the changes observed between each report should be provided.	PFDA's defined in the Interim Report were selected to encourage further engagement during the spring engagement program. Consideration of the geophysical characteristics was a key factor in the revisions to the PDA boundaries between the Interim Report and the Draft Final Report.

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350	Section 2.6.2 (pg. 54-55) Lessons from other jurisdictions - There are not too many details on the best management practices used in other jurisdictions to mitigate the overlap with fisheries. More details should be provided on this.	The Committee provided examples from other jurisdictions as they relate to fisheries but note that the development of Best Management Practices and specific operating Guidelines defining co-existence at a project level have yet to come. Some recommendations such as the need to better characterize the fishery in a WEA (T4-2) speak to this, as do the fisheries related recommendations designed to effectively engage fishers in research and project design (T4-3).
351	Section 2.6.5 (pg. 57-58) Details of compensation models (BOEM) - Compensation is and should always be used as the last resort after avoidance. As we are technically not sure that Offshore Wind would ever be developed around Nova Scotia, presenting the BOEM model may be unnecessary at this stage.	The BOEM model was meant to provide context for what has taken place in other jurisdictions and to support the general discussion around compensation.
352	Section 2.6.6 (pg. 63) NFLD already opened for bidders - We understood that these reports would be used to determine if NS and NFLD would be adequate for the development of offshore wind. In the case of NFLD, why are we still reviewing their draft report, if the provincial already opened the floor for industry bidders?	Please note that the Report states that the province of NL has opened bidding for onshore wind - not offshore wind
353	<p>Section 2.6.6 – Bidding Criteria</p> <p>The global offshore wind market is struggling, with rising costs (vessels; steel; etc. ...), cancelled projects (USA), undersubscribed auctions (Maine; Denmark), shrinking supply chain (GE Vernova exiting offshore wind turbines), and multiple developers exiting offshore wind (BP; Shell; Equinor; Corio; etc.). The auction design should reflect the current status of the global offshore wind market. Auction design should reflect a small number of clear priorities: either price, or construction timing, or community engagement, but not all treated equally. These priorities often conflict, and it is important that the auction design reflects which objectives have the highest priority.</p> <p>Recommend a seabed auction design focused on Proponents ability to successfully deliver an offshore wind project. Successful delivery of an offshore wind can be an 8 – 12-year process – plus 20 to 30 years of operation afterwards - and requires permitting experience, technical expertise, operational experience and a large balance sheet to weather the changes that occur over the lifetime of the development cycle and a project. An analysis of this capability could involve a review of a Proponent’s capacity to: (i) develop; (ii) procure; (iii) finance; (iv) construct; and (v) operate an offshore wind farm. The clearest way to assess this capability is to review existing operating offshore wind projects, plus balance sheet.</p> <p>In support of above, we recommend a review of the Crown Estate Scotland’s ScotWind auction design</p>	As indicated in T3-3 (Section 10), there are a variety of considerations related to the bidding process and bidding criteria. This will be discussed further by regulatory agencies and the CNSOER.

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	as an example of a successful mechanism that attracted a broad range of developers with different technology types committed to meet construction targets over multiple years. The Crown Estate Scotland’s ScotWind auction attracted multiple projects that show a high probability of deliverability.	
354	Page 49 – NRCAN suggests that the sentence “That work includes an active data collection program in support of the offshore wind industry” be reworded to more precisely define the mandate of NRCAN’s data collection campaign, which is to assist decision-making by government and other stakeholders with regards to offshore wind energy.	Text edited to match NRCAN's mandate
355	In addition to the concerns raised on risk mitigation, we would like to understand how those risks were addressed or mitigated in actual developments across the globe. The report mentions Denmark being the first country to endorse offshore wind development. Can the committee outline what were the actual challenges met by other developments, and how that informs this development. Fishers would benefit from actual experiences and how the development responded to issues. Issues of note include vibration, noise, impacts on fish habitats during and after construction, and how those issues impacted the ocean and fishers in other developments.	This Regional Assessment is focused on the RA Study Area. A detailed examination of developments across the globe is outside the scope. Some discussions were had with projects in Europe and the US to understand lessons learned so far in the OSW industry - please refer to section 2. Ongoing research is important (around effects) and this is noted in recommendation T1-1 (see section 10).
356	<p>This section describes the data gaps and limitations (page 49) of the “Several studies conducted in recent years merit specific reference (detailed in section 2.2) as being useful and directly relevant to the identification of Potential Development Areas (PDAs) within the RA Study Area. These studies have enabled a comparison of the conclusions reached independently using the same data but have also provided a baseline level of understanding for the Committee to interpret other information gathered and submissions received” (page 35). ECCC’s prior comments about the studies referenced in the report, and the limitations of those studies, are not reflected in this section and should be. The limitations of these approaches with respect to aerofauna species could be clearly stated.</p> <p>Recommended text: “The identification of PDAs within the RA Study Area was directly informed by several studies conducted in recent years (detailed in section 2.2). Among these studies, only one incorporated aerofauna data (Nagel et al., 2024) meaning the influence of aerofauna considerations on PDA locations was limited. Additionally, the study that did include aerofauna data highlighted several limitations, including:</p> <ol style="list-style-type: none"> 1. The study did not examine all marine or aerofauna species present within the study area; 2. The study did not include information on migratory movements or connectivity for aerofauna (e.g., flight paths, migration corridors); 3. The study did not include areas of use by COSWEIC assessed Leach’s Storm Petrel; 4. The study did not include ECCC predictive density models, which help to understand pelagic distributions of migratory birds using habitat covariates; 5. The study did not include foraging radius work for Leach's Storm Petrel because it obfuscated the 	Text added to Section 2.3 (Data Gaps and Limitations)

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	regional foraging patterns of NS colonies. Other data exist to help inform this, which is important as Country Island is a significant location and movement and foraging areas are collocated within the PDAs; 6. Regional important shorebird sites were not included in the DFO model; and 7. The study did not include collision and displacement vulnerability data for seabird species as they were unavailable at the time of development and have since been provided.”	
357	Fisheries Engagement (page 42): The statement “due to the small number of license holders (less than five), their catch data are not incorporated into DFO’s database” is not accurate. DFO has landings data for fisheries with a small number of license holders such as the sea cucumber fishery. However, to comply with the Government of Canada’s privacy policy (known as the “Rule of Five”) these data cannot be shared publicly. These landings were incorporated into the DFO Technical Report “Application of Marxan with Zones as a marine spatial planning decision-support tool: a case study for offshore wind planning in Nova Scotia.” Similarly, scallop fishery data are incorporated into the publicly available database, just not in cases where there are privacy concerns. Suggest clarifying that these catch data are not made publicly available or stating that “database” refers either to the Atlas or the Eastern Canada Commercial Fishing (ECCF) dataset.	Text corrected
358	DFO Marxan with Zones Analysis (page 48): “...but with some larger areas identified, including a section of Middle Bank.” Middle Bank should be changed to French Bank.	Text corrected

#	Comment	Committee Response
Section 3. Offshore Wind Development		
359	(2.0 OSW) - To ensure comprehensive planning and assessment of potential OSW projects’ onshore components, EFN requests that the final report include an overview and assessment of anticipated onshore infrastructure required to operate OSW farms, along with potential environmental and social impacts, engagement strategies, and accommodation and mitigation measures.	While the Committee understands that onshore infrastructure is an important component of an OSW industry, the focus of the RA is the Study Area which includes only the jointly managed waters of offshore NS.
360	(3.2 Committee Mandate) - It is crucial that the integration of Indigenous Knowledge is included as a key objective in the final OSW report. Furthermore, the final report should provide a detailed analysis of how Indigenous Knowledge has influenced the assessment of potential positive and adverse effects of OSW development.	Consideration of Indigenous Knowledge to specific positive and adverse effects of OSW development will be project specific; however, the TOR required that the RA consider Indigenous knowledge throughout the Committee's engagement and as part of the analyses for the RA. This has been noted in various sections of the report (see section 2.1.2.1, section 4.6.2) and input

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		received from Indigenous participants was included in the What We Heard Summaries which were posted to the Registry and considered as part of the Committee's deliberations. As a result, Indigenous Knowledge was a key part of the Committee's deliberations and recommendations (see sections 10.2 and 10.5).
361	(3.3. Parallel Activities & Timeline) - We acknowledge the Committee's recommendation for the establishment of a Nova Scotia Offshore Wind Collaborative Research Initiative (Recommendation 1), which is an important step toward addressing ongoing research needs and data gaps. However, we urge the Committee to provide further clarity on how Indigenous Knowledge and Indigenous individuals/groups will be actively and meaningfully included in this initiative. Specifically, we request that the Committee provide clear and concrete recommendations on the following: 1. How Indigenous peoples will be represented in the Collaborative Research Initiative. 2. How Indigenous Knowledge will be incorporated into the research process. 3. The mechanisms for ensuring that Indigenous participants are adequately supported (i.e. through dedicated funding) to ensure meaningful and active participation in the research.	The Committee cannot be overly prescriptive in the objectives and related processes of the recommended Scotian Shelf Collaborative Initiative (SSCRI in T1-1, section 10). Clarity on how Indigenous Knowledge and Indigenous peoples will be represented in this initiative, use of Indigenous Knowledge, and funding mechanisms for participation will be determined in the planning phases. It is noted that funds be available for Mi'kmaw Ecological Knowledge Studies (MEKS) and that participant funding and funding to Mi'kmaw organizations is provided for research on adaptive management.
362	Section 3.2.3 (pg. 79) "the typical project operating life span of an OSW farm is in the range of 20 to 25 years [...] dependent on the environmental conditions and quality of the O&M program." - What environmental conditions and how would these impact the life span of the farm? The construction of these offshore wind farms will negatively impact the surrounding environment. Therefore, it is critical to know the exact lifespan of these turbines and the potential influences of the surrounding environmental conditions. Nova Scotia waters are rough and with climate change, the frequency of extreme weather events is increasing. This is likely to reduce the life span of turbines considerably. In this case, the benefit of implementing these farms becomes even more questionable.	Noted. Environmental conditions are considered as part of overall project design. Operations and maintenance plans and mitigation plans are required and authorized by the CNSOER.
363	Section 3.2.4 (pg. 79-80) Decommissioning - Would the OSW fall under the current legislation for oil and gas or the one for renewable energy? The community is concerned that most companies will not have the funds to ensure the decommissioning phase. It is vital to avoid repeating the tidal energy fiasco and leave the turbines in the water indefinitely.	Addressed, see recommendation T3-5
364	Section 3.3.1.1 (pg. 83) Vessels to be coming from abroad - Where would those vessels come from exactly? What would be the benefits for NS and Canada if all vessels were coming from a different country? If the infrastructure and equipment are not currently available, it is important to build capacity before considering any project.	Specifics on vessels and vessel origin are outside of the RA scope at this time. This information will be part of a project planning phase.

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Section 3. Offshore Wind Development		
365	<p>1. OSW Project Design. Based on information presented in the Reports, it is difficult to visualize the spacing of turbines and size of OSW farms. While we understand these characteristics can vary, a description of these attributes would help readers understand what size of exclusion zones might be needed, and what gear type may be used to fish within an OSW farm.</p> <p>Recommendation 1: Please indicate what is typical (in terms of OSW farm total size and turbine spacing), based on other jurisdictions, and/or what the range in these characteristics might be expected. The Vineyard 1 OSW farm may present a useful example. How big is the lease area? How many turbines and at what spacing? What percentage of their entire lease area is occupied by turbines?</p>	<p>Exclusion zones and co-existence will be project specific and will depend upon the project size, layout, location, type of fishing and other factors. The specifics of exclusion and co-existence cannot be determined at this time. There is no typical OSW farm layout - each one is unique based on developers, licensing and approvals, offshore conditions, the area available for leasing etc.</p>
366	<p>Page 69 – NRCan indicates that 59 m water depth is the deepest fixed bottom foundation installed by the end of this year (2024). Notably it is not a monopile, either, but rather a jacket foundation (please make this correction on page 73). There are a number of studies suggesting a theoretical possibility of fixed foundations from 60 – 100 m water depth but this should be stated explicitly as theoretical to date.</p>	<p>Text corrected</p>
367	<p>Offshore wind farms effects on marine environments have been heavily studied. Wind farms have been operational in the waters off several European countries for more than 20 years and a large body of research has been published on their effects on the biological component of the marine environment. One would have expected that the draft report would have had a comprehensive literature review of this active area of scientific research. In fact, several dozens (maybe hundreds) of studies exist over the past two decades. These studies focus on the short- and inter-mediate term impacts (5-10y) and not some unspecified time in the future as the draft report does. For example, here are the findings of a recent study by Lloret et al. (2022). The authors concluded that offshore wind farms (OWF) pose serious environmental risks to the Mediterranean Sea, OWF models cannot be simply imported from the northern European seas to other seas, OWF should be excluded from areas of high biodiversity and/or high valuable seascape, and OWF development should be forbidden in or in the vicinity of Marine Protected Areas (MPAs).</p>	<p>The Committee completed an extensive literature review within the scope of the RA. With regards to MPAs please refer to section 6 for details related to consideration of protected areas and the Committee's approach to PDA selection. As noted in the report, the Committee feels that OSW development siting is a case-by-case issue that requires an analysis of potential impacts and compatibility with marine protection objectives.</p>
368	<p>We submitted a request regarding whether the energy projects will be using a 3MW/km2 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.</p>	<p>The Committee noted in a previous response that there was no regulatory standard for density of MW/km².</p>

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Section 4. Existing Conditions		
369	How does the Indigenous fishing industry differ from non-Indigenous industry in terms of gear type, boat size, species fished, etc.? Future assessments need to understand how the Indigenous fishing industry differs from non-Indig fisheries in terms of gear, species, boat types etc.	Information on fisheries is provided in section 4.5 including species, gear types etc. Details of all fisheries will need to be considered on a project-by-project basis in order to determine key aspects of the impact assessment process.
370	We need to consider Moderate livelihood fisheries and species at risk (SAR)	Species at risk for various species are included throughout section 4. Information related to food/social/ceremonial and commercial communal fisheries has been added.
371	In the table on page 152, I would like you to consider adding two additional port location possibilities within the greater harbour of Shelburne. You have the first T-shaped wharf owned by the Town, however in our deliberations with Invest Nova Scotia (who are currently doing quite a detailed port study) they have identified two additional locations. The second location would be by the Municipality's industrial park immediately south of Shelburne Ship Repair and the marine industrial complex. This site was historically where the Canadian Navy refueled their ships that were fastened to two mooring dolphins just offshore. The site would require new mooring facilities, however there is historical precedent of the sites suitability. The third port site would be at the bottom of Sandy Point at the Old Naval Base (a second base used in the cold war years for undersea acoustic surveillance. Although the site was never historically a port, Invest Nova Scotia identified the water depth immediately offshore and a large curving land feature that encompasses a deep-water mooring area as a prime candidate for large seagoing vessels to access an onshore industrial area. The Municipality is currently modifying its Land-Use Bylaw and is anticipating creating industrial zones of at least 500 acres at these two additional locations.	Acknowledged and information has been added to Table 4.16 on additional ports.
372	<p>The second addition we would like to see in your report is some dialogue regarding the fact that the lobster industry in SW Nova Scotia has now been steadily declining since 2014. LFA 34 in particular has been hit the hardest with a drop of landings in the period since 2014 of 44%. LFA 34 is by far the greatest contributor to lobster landings in Nova Scotia. The importance of this fact to your report is that this fishery is the cornerstone to our entire economy in SW Nova Scotia and our Municipality now recognizes that we need to diversify our economy so that we are not entirely reliant upon the lobster fishery. As such, the consideration of Shelburne as a supporting port facility to the offshore wind industry would be a significant boost to our economy. As stated in our meeting we have plenty to offer in this regard that includes:</p> <ul style="list-style-type: none"> a. Three possible port options b. A ship repair facility with a marine rail capable of accommodating ships up to 4,500 metric tonnes. c. A marine industrial park with a number of other marine-related businesses supporting the fishing industry. 	The RA Report was not intended to focus on specific fishing areas - while lobster fishing is discussed broadly (see section 4. 5) the intent was not to detail each of the fisheries including the LFAs. Port options and related information has been added to Table 4.16. Wording has been added to section 8.6.3 noting NSCC campus location in Shelburne.

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	<ul style="list-style-type: none"> d. A local NSCC Campus who have identified they would be willing to design and offer courses to support the offshore wind industry. e. A local hospital and EHS station. f. A municipality actively engaging in a housing expansion plan and offering land for new housing development. g. A port that is very close proximity to highway 103. h. The Municipality has an accessibility plan and is designing an anti-racism plan within an ethnically diverse population. Our community includes: <ul style="list-style-type: none"> i. A large African Canadian population derived from the 1783 Black African Loyalists that settled in Shelburne, ii. The Wasoqopa'q First Nation have land in the Municipality that they are in the process of declaring reserve status, i. A growing population of permanent foreign workers that support our local fisheries and service industries. These groups include people from the Philippines and Far East nations. 	
373	References to the food web structure due to overfishing that seemed out of place in the document. Regime change might be climate linked.	Amendments have been made to the text in section 4, from "overfishing" to "fisheries changes."
374	Food, Social and Ceremonial Fisheries is all around offshore and not only small areas, report needs to better reflect this.	Details on Food, Social and Ceremonial fishing have been added to section 4.
375	Mi'kmaw seafaring canoe likely found off Sable Island, showing occupation.	Acknowledged. Indigenous archeological studies will need to be conducted at the project-level.
376	In Table 4.14, we would like further clarity on what the difference is between the two lists of population numbers between males and females for Indigenous Peoples residing off-reserve? (pg. 140-141)	This information was produced from Crown-Indigenous Relations and Northern Affairs Canada. Details can be found at: https://fnp-ppn.aadnc-aandc.gc.ca/fnp/Main/index.aspx?lang=eng
377	What question was used within the census to describe the off-reserve population? Is the question used only for those who have status, or does it consider those who may not have status? The question that is used by the Native Councils and MAPC is the identity question, which encompasses 42,580 individuals living off-Reserve in Nova Scotia. (pg. 140-141)	Details on the census are available from Crown-Indigenous Relations and Northern Affairs Canada at: https://fnp-ppn.aadnc-aandc.gc.ca/fnp/Main/index.aspx?lang=eng . The Committee only accessed the numbers to highlight the growth of the Indigenous population in NS and that this community overall could contribute significantly to the development of a new industry (as noted in Section 4.6.1).
378	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	It is currently unclear how much capacity will be required for onshore infrastructure (rail and road) as much activity is likely to take place in the water (i.e., turbine components

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	<p>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.</p> <p>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.</p> <p>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.</p>	<p>may not require overland transportation). The scope of the RA was to focus on offshore components.</p>
379	<p>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.</p>	<p>The Report notes both on-reserve and off-reserve populations to provide context to the overall population of Mi’kmaq living on-reserve versus off-reserve. The Report does not focus on the organizations representing Indigenous peoples in the province - the intent was to note that this is a growing population.</p>
380	<p>Constitutional rights should be mentioned in the draft Report</p>	<p>The Committee’s mandate does not include a “rights determining” role. The Crown’s Duty to Consult would be</p>

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		triggered if a decision is required (i.e., through a decision under the Impact Assessment Act) that could potentially impact Constitutionally protected s.35 rights. The Committee noted in the What We Heard Summaries (posted to the Registry and circulated to Indigenous communities for feedback) that the need to consider potential impacts to Indigenous s.35 rights should occur at the project level.
381	Concerned about work camps for Indigenous women and boys	This topic is addressed in section 5.7.4 (Inequities and Barriers to Disadvantaged Groups).
382	The landings weren't substantial enough compared to areas with high numbers of fishermen or large landings from a large fleet. This made our activity look like low conflict. But for DFO's ability, they don't have the ability to do anything else.	Text added to section 4 related to the limitations of the data.
383	Concerned about developing in Marine Protected Areas	Please refer to section 6 for details related to consideration of protected areas and the Committee's approach to PDA selection. As noted in the report, two MPAs were excluded from PDAs. However, the Committee feels that OSW development siting is a case-by-case issue that requires an analysis of potential impacts and compatibility with marine protection objectives.
384	General comments: <ul style="list-style-type: none"> • Applaud committee's efforts to compile relevant data and consideration of not only direct but also indirect and inferred impacts. • GBA+ analysis is new for the OSW sector, and we would anticipate limited data from historical projects / industry data. 	Noted.
385	The implementation of moderate livelihood fisheries plans by Mi'kmaw communities has led to significant progress in exercising their treaty rights in a structured and sustainable manner. Over the past four years, the KMK-led Treaty Right Protected (TRP) fisheries have achieved considerable success, marked by collaborative efforts and positive relationships with key stakeholders, including with Fisheries and Oceans Canada (DFO) Conservation and Protection (C&P) directorate and local Lobster Fishing Areas (LFA) associations. It is KMK's expectation that any Rights Based Fisheries will be considered by the appropriate regulators as well as with individual proponents as projects are developed.	Noted.

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386	Several Mi'kmaw First Nations, such as Potlotek, Eskasoni, We'koqma'q, Bear River, Acadia, Glooscap, Annapolis Valley, and Pictou Landing, have made strides in implementing moderate livelihood plans. These plans not only enhance the ability of Mi'kmaw communities to engage in sustainable fishing practices but also build trust and cooperation with DFO C&P. This collaboration has fostered co-enforcement and compliance processes that support both Mi'kmaw fishers and the broader goals of DFO-led fisheries management. The establishment of these co-enforcement initiatives has proven beneficial, helping to respect treaty rights while maintaining the integrity of fisheries conservation.	Noted.
387	KMK is interested in more detail about exactly what type of fisheries are able to coexist from various installations of offshore wind farms and we feel there is a significant gap in addressing any benefits to fisheries from the artificial reef effect on long term wind farms. The rapid loss of fish biomass and diversity in our oceans is a contributing factor to climate change and all efforts must be made to ensure ocean diversity is not lost at the cost of industry. KMK wishes to know what gear types are compatible with offshore wind.	Information on co-existence approaches will need to be discussed on a project level basis and will be influenced by the number of fishers in the project area, gear types, fisheries and project design. As the Committee notes in section 4.6, fishing is a diverse industry, and the potential direct and indirect impacts of OSW development including possible displacement from fishing grounds and the related spillover financial and cultural consequences need to be better documented and, to the extent possible, quantified. Not only is there a need for the changes that are and could take place in the fishery to be better understood, but regulators need to consider management regimes and regulatory processes in light of a new industry competing for space in the offshore area. It is further noted in section 9.2, that the need to obtain thorough research and an understanding of the many factors involved will better facilitate approaches to the fishing industry's coexistence with the OSW industry. This includes an understanding of the fishing industry's socio-economic and cultural importance to coastal communities, to Indigenous communities and to the province. With these gaps in knowledge in mind, the Committee provides recommendations towards co-existence and compensation in section 10.4.
388	Any time there is a watercourse, named or unnamed, regardless of size or velocity, and whether there is terracing or not, there is a heightened probability of encountering Mi'kmaw archaeological heritage. The Assembly of Nova Scotia Mi'kmaq Chiefs, KMK and the Mi'kmaw Nation in Nova Scotia expect a	Text has been added to section 4.6.6 acknowledging the potential for Mi'kmaw archaeological heritage. Please also

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	high level of archaeological investigative diligence and consultation when potentially disruptive activities are contemplated.	refer to Committee recommendation related to MEKS in section 10.1
389	Summary of Mi'kmaw Rights including subsections on Peace and Friendship Treaties, FSC purposes, Marshall Decision, Moderate Livelihood, potential impacts of OSW on rights of Mi'kmaw communities.	Text added to Section 4.5.1
390	The Draft Report does not assess the baseline conditions, whether the existing environmental status is good, healthy, and resilient enough to absorb the disturbances arising from OWE development.	The Committee's scope of work does not include field research or assessment of baseline conditions, and they cannot comment on this. This will be addressed at the project level impact assessment.
391	The effects on the composition and processes of ecosystems, and any irreversible impacts and irreplaceable loss should be assessed. OWE projects that cause irreversible damage or irreplaceable loss of biodiversity should not be approved.	Assessment of irreversible impacts cannot be assessed at this time as there are currently no projects underway and wind energy areas have not been selected. Project level impact assessments will address potential environmental effects and use monitoring to gather information on these data gaps.
392	Section 4.2.1 - requests further clarification on how climate change considerations will be integrated into the planning and design process for OSW projects. Specifically, how the increasing frequency and intensity of extreme weather events, as a result of climate change, will be accounted for in turbine design, infrastructure resilience and operational strategies. Addressing these factors proactively will ensure the long-term viability and safety of the project in an evolving climate.	Please refer to sections 4.2. and 5.4.
393	Section 4.6.5 - requests more detailed near-term (i.e. 5-10 years) assessments of grid capacity, required infrastructure upgrades, and potential risks related to the integration of OSW, especially as these factors are central to the feasibility of OSW projects in the region.	There is very limited information on these factors available. The Committee has noted that this needs to be addressed.
394	(4.2 Indigenous engagement) - We request further clarification on the approach for ongoing consultation and participation of Indigenous communities following the completion of the RA and in follow-up assessments.	There will be engagement throughout the process and the government's duty to consult will be triggered at the project-level.
395	Section 4.6 (pg. 139, 19) "Consider other components including Indigenous communities" - You may want to change the wording. Rightsholders cannot only be considered as another "component".	The reference to components was to components of the report as stated in the TOR. Text has been clarified.
396	Section 4.1 (pg. 87) "The remaining uncertainties can and should be resolved using these coordinated programs of research as OSW farms receive regulatory approvals techniques in a coordinated program of research as OSW farms receive regulatory approvals." - What about the use of the Precautionary Approach? The data gaps should be addressed BEFORE any proponents receive the regulatory approvals.	The Committee acknowledges that there are many data gaps (see section 9) and understands that attempts to fill these are already underway or will be initiated by the responsible authorities on a timely basis. Recommendations under Theme 1 (section 10.1) address the more pressing data gaps with respect to OSW development.

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397	Section 4.2.4 (pg. 97) Change to vertical mixing of surface waters - Can we have more details on this? How exactly would the turbine impact the surface waters? This can severely impact the entire water column and the stratification (e.g., nutrient mixing, primary production, diel migrations, etc.). Additional details are required (e.g., Floeter et al., 2017; Christiansen et al., 2023).	Additional description on vertical mixing of surface waters to added section 4.2.4.
398	Section 4.3.2 (pg. 102) Corals and sponges are not likely to be directly at risk from OSW and not discussed further - However, corals and sponges are still largely present in some of the presented PDAs (e.g., Western/Emerald Bank). The construction phase of wind turbines is highly disturbing for the benthic area and will therefore affect these vulnerable and significant species.	As noted in section 4.3.2, corals occur in the deepest waters and are unlikely to be disturbed as OSW would likely occur on the top of the banks.
399	Section 4.6.1 (pg. 141) Population of Indigenous Communities in NS - The table present the details by gender. However, there are no such details for non-Indigenous communities. Is there a specific reason for including such data in the report? Does the gender table support the comments on observed gender inequality in the renewable energy sector presented later on?	As noted in Table 4.14 the information was taken from a census done by Crown-Indigenous Relations and Northern Affairs Canada, and this is how the information is presented.
400	<p>Role of Wind in Shaping Oceans and Ecosystems:</p> <p>Wind plays an important role in shaping the structure and function of the ocean ecosystem. Wind energy influences and determines key oceanographic processes (mixing, sediment movement, gyre formation, thermal/chemical conditions) which support the structure and function of bank ecosystems (production, larval distribution) and those further afield. We are concerned that, because of a shortage of materials in the report highlighting the role of wind, this important fact may be overlooked by readers.</p> <p>Furthermore, there is an established body of academic and regulatory research that has clearly demonstrated potential, if not realized impacts due to the introduction of offshore wind arrays. We would suggest the review of this body of work be expanded upon in the report and offer to provide key references if required.</p>	Additional text has been added to section 4.2.1. The RA is meant to be broad and high level and has acknowledged the potential for impacts from OSW.
401	Operational Details of Fishing: As the industry that stands to be most impacted by the establishment of offshore wind, the description of how fisheries are undertaken in the study area is incomplete. As an illustration, while fixed gear is a common designation, the configuration differs among and within species. For example, a lobster trap and snow crab trap are both examples of fixed gear but are configured differently and pose different and unique challenges for co-existence and displacement. The deployment of gear for Atlantic halibut varies substantially across the study area and even among the identified potential development areas (PDAs). Each gear configuration will have different limitations, impacting its ability to be used within or around an offshore wind development. A basic understanding of the activities associated with fishing is required to properly assess how they may be impacted by development. We believe this level of detail, or a clear acknowledgement of the gap, should be included in the finalized report to help guide further consideration of impacts and mitigation.	See recommendation T4 and the characterization of fishing within a WEA. This characterization cannot be done until WEAs are defined and project sites selected, and projects designed. Impacts will vary depending on the site, the type of fishing, gear used etc. and will therefore be project specific. The Committee does acknowledge that different gear types and different approaches to fishing are key to understanding and addressing the unique challenges for co-existence (refer to Section 10.4).

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402	<p>Consider the following addition of text (in red) after "The TOR require the Committee to "consider the intersection of sex and gender with other identity factors and make recommendations on the manner in which future impact assessments should consider and address these factors". It is recommended that the Committee considers the intersection of sex and gender with other identity factors, and how identity factors simultaneously interact with one another and interact with contextual and systemic factors (e.g., health, economic, social, historical contexts). Intersectionality, as an analytic framework, requires the consideration of how a person's identity (for example, sex, gender, age, ethnicity, class, religion, sexual orientation, ability) combine to create particular forms of discrimination and privilege AND the consideration of the historical, social, and political context and the systems of discrimination that create and sustain inequalities, barriers of opportunity, and access for various population groups.</p>	<p>The Committee commissioned a study to consider the factors mentioned. The report by CRIAW has been posted to the Registry. This wording was added to the report.</p>
403	<p>The report does not include fishing data for this area beyond 2021. This data limitation omits the fishing undertaken by Clearwater vessels in more recent years, which has been steadily increasing as we become more familiar with the resource and the successful fishing grounds and build the market for this product.</p>	<p>Text added at the bottom of Table 4.12 to recognize data limitation and fishing effort since 2021</p>
404	<p>Island Bank is no longer a candidate area.</p>	<p>Information on sea ice and icebergs has been added as section 4.2.6 and section 5</p>
405	<p>The Draft Report's evaluation of fixed bottom foundations is focused on depths of <60 m, resulting in approximately 2.4% (7,187 km²) of the 300,000 km² RA Study Area considered suitable for fixed bottom structures. It states that "the Committee assumed that advances in technology over the expected development timeline for 5 GW of leases would potentially push that number to 70 m, and any depths greater than 70 m would be feasible for floating structures." Technology advancements for depths up to 70m would be unlikely to be considered based on the current project timeline due to uncertainty with geological conditions that could potentially effect embedment depth of a fixed foundation along with regional specific load cases. Therefore, we recommend that the 2.4% of the RA Study Area with this depth profile should be a priority area for de-risking challenges associated with foundations and should be optimized based on potential project size.</p>	<p>Noted.</p>
406	<p>Additional considerations for the implications of sea ice, sea spray, ice formation, and future modeling due to climate change would be beneficial. Quantifying potential impacts to installation, operations, maintenance, etc. will be important to overall project economics. Ice formation on turbines can affect aerodynamic performance, and modeling based on precipitation and temperature data will be necessary. While offshore turbines are not as susceptible to these effects, considerations must be given based on the regional climate assessment. Additionally, sea spray and subsequent ice formation can have a major impact on installation, as well as personnel access for operations and</p>	<p>Information on sea ice and ice bergs has been added as section 4.2.6 and section 5</p>

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	maintenance. Mitigation measures for these atmospheric conditions can have an impact on project assessment.	
407	It should be noted that systematic visual monitoring effort for marine mammals remains limited on the Scotian Shelf. While passive acoustic monitoring (PAM) has been conducted off Nova Scotia since the early 2010s, the effort has been biased towards the continental slope and information on marine mammal occurrence on the Scotian Shelf, where most offshore wind farms would be developed, remains limited in comparison. This is particularly true for the eastern part of the Scotian Shelf and the proposed lease areas which have drawn most interest from developers.	Text has been added to Section 9 to acknowledge gaps in marine mammal distribution.
408	It is recommended that the findings and analysis from the Strait of Canso Sustainable Infrastructure Strategy to provide a more comprehensive assessment of the Mulgrave Marine Terminal and the broader Strait of Canso region, particularly in relation to supporting the development of the wind industry.	Noted. Mulgrave Marine Terminal was included in Table 4.16 of section 4 which was meant only to provide a high-level description of principal wharves and associated facilities in NS.
409	The Committee should be made aware of a regional geological model study that includes the majority of the areas identified in this report. The specific objectives of the study are to a) assemble existing geoscience data related to bathymetry, surficial geology, sediment thickness, stability, and geohazards; b) combine all geoscience layers and assign a weight to each geological factor integrated in the model. c) assess the spatial patterns associated with the model results and integrate those results into a broader framework of geological and geographical knowledge. The report provides valuable information on the seabed geological conditions that are relevant in the context of the RA study area, expanding upon previously considered geological analyses in the studies considered in section 2. It also provides a thorough summary of relevant geological parameters that should be considered for offshore wind energy infrastructure and what data is readily available for analyses.	Link to NRCan's report on the Registry has been provided. Ongoing work will be required for site characterization at the WEA level and beyond.
410	Page 92 The sentence “Slumped deposits resulting from periodic mass sediment failures along the shelf slope (Mosher et al., 2004)” should be moved to the following paragraph as it refers to the continental slope – oceanward of the shelf edge.	Text has been moved.
411	Page 93 – Glauconite hardens under stress. Please see: https://doi.org/10.4095/p4vptgc1s2 - “Under stress related to monopile driving, the glauconite sand may transform into a non-penetrable clay-like substance”.	Text corrected.
412	Page 93 – Although recency may be an issue, there is a fair amount of publicly available data on the geology of the southeastern Gulf of St. Lawrence, including surficial geology maps and bedrock geology (https://doi.org/10.4095/222864), geotechnical and scour assessments (e.g., for the Confederation Bridge - https://www.proquest.com/scholarly-journals/bridge-pier-scout-assessment-confederation/docview/213339136/se-2?accountid=28163), geomorphological interpretations (http://dx.doi.org/10.4095/326514), etc.	Noted.

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413	Include reference to and context about the Maritime Link in the final report and other existing or future critical interprovincial infrastructure	Information for the Maritime Link has been included in Section 6

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486	Underwater archaeological, cultural and heritage resources must be identified, documented, preserved. Mi'kmaq archaeologists need to participate in this process.	Acknowledged and an amendment has been made to text in section 5.6.6.
487	Concerns regarding potential impacts to crab and shrimp fisheries: <ul style="list-style-type: none"> • Eskasoni fishing occurs in areas 23 and 24, there are 122 fishermen, 12 crab licenses and 13 shrimp licenses. Vibration and effects of high (hurricane) winds on turbines are concerns (accidents and malfunctions). • We'koqma'q fishing occurs in area 23, 2 snow crab licenses, 50% occurs in Gulf, Redfish, Elvers (Glass Eels), area 23, shrimp stock decline. 	Effects of vibrations are included in section 5. Accidents and malfunctions are addressed in section 5.
488	Couple of places where value judgments were made (impacts to the fishery are moderate – actually they can be substantial to an individual)	Further information on landings versus the value of fish species has been added to sections 4 and 10.
489	Shadow flicker – engineer has explained why this isn't an issue at the shoreline, graphed distance to the turbine. Recommend including a comment on this and explaining how this isn't a major problem in OSW developments compared to onshore wind projects (specific distance from turbine where it is no longer a factor)	Clarifying information, re: 25km buffer, has been added to the shadow flicker description in section 5.
490	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.	Additional text has been added to Table 5.6.7.
491	When discussing the 45-kilometre buffer around the two national parks within the province of Nova Scotia, has there been a consideration about the potential for light pollution? For example, Kejimikujik is a dark sky preserve and may experience greater impacts due to light pollution than other urban areas. (Section 5.6.6 – Page 158)	Text has been added to section 5 on Artificial Lighting.
492	While the mapping from 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	The RA Report is meant to be high level and broad in the information presented. Details around specific migratory routes will be assessed at the project level stage as part of

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	<p>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 <i>Lasiurus cinereus</i>, Eastern Red Bat <i>Lasiurus borealis</i> and Silver-haired Bat, <i>Lasionycteris noctivagans</i>, 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.</p> <p>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.</p>	<p>the impact assessment process. Details on potential effects to bats and curtailment have been added to section 4 and section 5 respectively.</p>
493	<p>Has there been an effort to provide visual renderings of the potential aesthetic impacts of offshore wind developments at varying buffer options, including 25, 50, and 75-kilometre buffers?</p>	<p>Visual renderings are project specific. The RA did not explore this because there are currently no projects proposed.</p>
494	<p>Has any of the mapping that has been done included movements of the North Atlantic Right Whale habitat and migration paths to avoid further impacts to this already at-risk species? If there are changes to listing status for the NARW and other marine mammal species, will the suitability and availability change? We are thinking presently about the potential change in the protective status for the Sei whale and how this may impact eligible PDAs</p>	<p>The current critical habitat is mapped in the Report. However, critical habitat and migratory paths are changing in response to many factors, the specifics of which will be considered at the project level stage.</p>
495	<p>Ensuring construction is occurring outside of critical timeframes for the commercial fisheries has been considered, has the seasonality of the Indigenous Food, Social, and Ceremonial fishery been considered as well?</p>	<p>Many FSC fisheries are open year-round and occur outside of commercial seasons. The timing of construction activities is project specific (outside the scope of the RA) and planning around FSC fisheries will take place with Indigenous communities as part of the project process.</p>
496	<p>Is there an established protocol for chance-finds of artifacts during the development or exploration phases? How will proponents and communities be engaged in this process?</p>	<p>Protocols are established under the Special Places Protection Act and require reporting of archeological finds to the Department of CCTH and to KMKNO archaeologists.</p>
497	<p>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.</p>	<p>Acknowledgment of food security and food sovereignty has been added to section 5.</p>

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	<p>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).</p>	
498	<p>Inter-array cables would rely energy through one cable, do we know what the effect of putting all the subsea cables into the corridor will have on the environment?</p>	<p>The potential effects of an array of multiple cables in a single corridor on the Scotian Shelf is unknown but some studies are underway (e.g., cables in the Cabot Strait for the Maritime Link). This is a data gap that will need to be addressed through monitoring programs at the project level.</p>
499	<p>Concerned for ground disturbance (detrimental to fisheries) at Western Emerald Bank</p>	<p>Seabed disturbance has been identified as an IPF in section 5, and mitigation, monitoring associated with potential interactions are presented in Section 6.</p>
500	<p>What will happen with Committee's recommendations? What will be the process for determining the preferred development areas?</p>	<p>The Committee's recommendations will be reviewed by the Ministers, and it will be up to government to decide which, if any, of the recommendations will be implemented. There is no timeline for this. Please refer to the Committee's conclusion section in section 10.</p>
501	<p>Human trafficking is an ongoing issue and concern, offshore work environment may add additional risk due to potential isolation. Awareness is important for prevention, especially at ports</p>	<p>Noted. These concerns are discussed in sections 4 and 5.</p>
502	<p>While Nova Scotia's development of offshore wind is a critical step in reducing the province's reliance on coal and advancing its transition to renewable energy sources, this progress must be balanced with the preservation of sensitive marine habitats. Specifically, the presence of sensitive benthic habitats must be thoroughly identified, coupled with the implementation of appropriate and holistic mitigation strategies. Benthic habitats play a crucial role in supporting the health and stability of marine environments, such as providing nutrient cycling, carbon sequestration, and water filtration. Protecting them is essential for sustaining ecological balance and must be prioritized during the construction and development stages of any offshore developments.</p>	<p>Noted and agreed.</p>
503	<p>Offshore wind energy offers a more sustainable alternative to traditional energy production methods, but its potential impacts on marine species must be carefully evaluated. In particular, the noise</p>	<p>Noted and agreed.</p>

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	<p>generated by vessel traffic during the construction and decommissioning phases of offshore wind projects poses a significant concern. These activities introduce both impulsive and continuous noise into the marine soundscape, potentially affecting local marine mammals and fish species. It is especially important to understand how the specific frequencies emitted by these anthropogenic sources may impact the behavior, physiology, and overall well-being of marine life. Given that underwater noise from human activities has been shown to cause adverse physical, physiological, and behavioral effects in cetaceans, this project should not proceed until these threats are thoroughly understood or effectively mitigated in the unique conditions of the Atlantic Ocean. Where research is limited, a precautionary approach is essential, prioritizing the implementation of mitigation measures to safeguard marine ecosystems and ensure long-term sustainability.</p>	
504	<p>Much of the area to be developed is ancestral Mi'kmaw lands and these communities should be considered in the development and management of the associated environmental and cultural data.</p>	<p>The Committee has considered this. Report generally addresses these concerns noting that the Mi'kmaq should be engaged throughout the development of this new industry.</p>
505	<p>Impacts to traditional fisheries and culturally sensitive species need to be adequately considered.</p>	<p>The Committee agrees that understanding the impacts on traditional fisheries and culturally sensitive species is important. Acknowledged in Table 5.8</p>
506	<p>Technology is changing rapidly – permitting and mitigation planning should define constraints but allow developers to determine technology options to meet requirements.</p>	<p>Noted. This is project specific.</p>
507	<p>Consider common approach to climate change assumptions and consider using collected site data from developers to calibrate climate models.</p>	<p>Noted. This is project specific.</p>
508	<p>Visual impacts can generally only be minimized from one perspective. How will the impacts on communities be balanced?</p>	<p>Visual renderings are project specific. Mitigation will be project specific.</p>
509	<p>Decommissioning requirements and developer plans should be developed and assessed with participation from Mi'kmaw communities. Decommissioning securities should be included in any developer requirements.</p>	<p>Noted. This is project specific.</p>
510	<p>Offshore wind has the potential to impact the Mi'kmaq rights as recognized and affirmed under section 35 of the Constitution Act, 1982, including the right to hunt and fish for subsistence and a moderate livelihood throughout Mi'kma'ki (unceded territory of the Mi'kmaq people). Lobster, salmon, eels and trout are all culturally significant species found in various bodies of water where offshore wind may become viable. Potential impacts to these species and other Aboriginal and treaty rights must be consulted upon as this sector develops. Beyond the legal requirements associated with Rights and Title, consideration for mitigation and monitoring of Mi'kmaq cultural practices, community well-being, and land and resource uses should be a requirement of any mitigation,</p>	<p>Noted and agreed.</p>

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	monitoring, management, or decommissioning planning and developed with input and review by the Mi'kmaq of Nova Scotia.	
511	Summary of potential impacts of OSW on rights of Mi'kmaq communities including subsections on Governance Impacts, Economic Impacts (increased stress on fishing rights, conflicts over fishery management due to resource availability), Cultural Impacts (Nat Resource Management Differences, Marine Species, Cumulative Impacts, Impacts on Endangered and Culturally Significant Species).	Noted. Refer to modifications made throughout section 5. Impacts on Mi'kmaq rights will be addressed at the project level.
512	Summary of potential mitigation measures including specifics for commercial fisheries, marine mammals, avifauna and bats, cultural heritage and archaeology.	Mitigations measures have been added to tables throughout section 5. Additional mitigation measures will have to be determined at the project level.
513	Biodiversity criteria based on scientific evidence should be used so that OWE activities do not compromise biodiversity objectives.	Noted.
514	The impacts of the development of OWE on species extinction, habitat loss or ecosystem loss, and loss of ecosystem services of social and economic value should be assessed	Noted.
515	The impacts of OWE projects, including the cumulative effects, on migratory species should be assessed. In addition, the location of OWE should be assessed to see whether it is a high-risk area for migratory species, and what impacts this location might have on migratory species. The limit for OWE projects is that these projects should not undermine the distribution and abundance of migratory species and their current and future habitats in the long term.	Collection of baseline data and assessment of potential impacts to valued components (including effects to migratory species) as a result of OSW development will be completed at the project level. See also recommendation T1-1.
516	The sensitivity of the environment, where OWE projects are constructed, should be assessed. Sensitive areas include protected areas, areas containing threatened ecosystems outside protected areas, areas important for the maintenance of key ecological or evolutionary processes, and habitats for threatened species.	Noted.
517	OWE projects should not undermine the conservation of wetlands and waterfowl, the related plans, established nature reserves on wetlands, and the increase in the population of waterfowl. This can be done by identifying suitable areas for the development of OWE and avoiding areas that might have negative effects on protected areas or cause displacement or disturbance of migratory waterbirds such as migration corridors, Ramsar Sites, Special Protection Areas, and Important Bird Areas.	Noted.
518	Areas that would have impacts on bat populations should be avoided. Bats' mortality should be reduced through using the best available technologies and measures including blade feathering, higher turbine cut-in wind speeds, and temporary shut-down of facilities during peak periods.	Effects on bats and potential mitigation are addressed in the RA in sections 4 and 5.
519	The location of OWE projects must be carefully selected to be outside migration routes.	Migratory routes will be taken into account in the determination of OSW project siting as part of the planning and assessment processes.
520	In EIA, some criteria must be used to assess the effects of OWE projects. Such criteria include the size of OWE project, the cumulative effects of OWE projects with other projects in marine areas, the	Noted.

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	pollution or introduction of harmful substances into marine waters, the risk of accidents between OWE projects and shipping, the environmental effects on marine protected areas, environmental quality standards, the impact on landscapes of significance, the nature, magnitude, probability, duration, frequency, complexity, and reversibility of effects.	
521	<p>Section 5.6.1 - Recommend that further details are provided on the methodologies for quantifying GHG emissions, establishing performance benchmarks, and ensuring that mitigation measures for vessel emissions and air quality are aligned with regional and international best practices.</p> <p>2. Requests that clearer integration of climate change considerations into the planning and design process would help address long-term challenges and ensure the project's sustainability</p>	<p>Detailed methodology around the quantification of GHG emissions and establishment of benchmark requirements is outside the scope of the RA; however, text has been added to Table 5.3 acknowledging alignment with best practices.</p> <p>Integration of climate change considerations into the planning and design process would be addressed as part of the impact assessment process.</p>
522	Section 5.6 - recommend a comprehensive implementation and enforcement plan provided for all proposed mitigation measures. This should include clear mechanisms for monitoring their effectiveness, particularly for bird and bat collision risks, noise management, and habitat protection, and detail how adaptive management will be employed throughout the project's lifecycle. The plan should specify metrics for success, timelines for review, and how findings from ongoing research and stakeholder consultations will inform adjustments to mitigation strategies.	Noted and agreed.
523	Section 5.6.4 - recommend that the Committee develop a clear plan for ongoing engagement with fishing communities throughout the project lifecycle, particularly regarding compensation and access to fishing grounds. This should include specific mechanisms for addressing concerns in a timely manner, ensuring that dialogue is maintained, and that any necessary adjustments to mitigation strategies are made if issues arise during project implementation.	The Committee has acknowledged the value of ongoing engagement with the fishing industry throughout the RA report.
524	Section 5.6.6 - request that a clear and structured plan should be developed for conducting pre-construction surveys with active engagement of Mi'kmaq knowledge holders, to ensure that both known and potential heritage sites are properly identified and protected. Additionally, monitoring measures should be more clearly defined, particularly regarding how newly discovered archaeological or culturally significant sites will be managed.	Protocols are established under the Special Places Protection Act and require reporting of archeological finds to the Department of CCTH and to KMKNO archaeologists.
525	Section 5.7.1 - request that the Committee provide a more detailed strategy for ensuring the equitable participation of First Nations communities in both employment and the supply chain. This should include assessing the existing skills gap in First Nations communities and proposing targeted training and capacity-building programs to facilitate Indigenous workers' entry into the OSW sector. Additionally, the report should outline specific approaches for engaging First Nations businesses in procurement opportunities, such as direct contracts or subcontracting. A more thorough discussion of how international trade commitments might impact First Nations' access to supply chain	The RA Report is meant to be broad and high level in scope. Details on equitable participation, specific approaches for engaging First Nation businesses, effects of international trade commitments etc., are outside the scope of the RA and will need to be explored as the OSW industry begins to develop and supply chain requirements are identified. Text has been added to T2-5 to acknowledge the need to look at

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	opportunities is also needed to ensure that these communities can fully benefit from the economic opportunities associated with the OSW development.	skills gaps, training and ways to engage First Nations businesses in procurement opportunities
526	(5.5 DFO Marxan with Zones) - request further clarification of how the 90% figure was determined, if sensitivity analysis was conducted, and if so, how that might affect the outcome of each scenario.	This is specific to the Marxan Study completed by DFO.
527	(5.7 Data gaps) - We request clarification on how these data gaps pertaining to the physical environment, marine mammals, marine and migratory birds, bats, insects, and commercial fisheries will be effectively addressed and mitigated should any OSW projects proceed, and how any potential impacts will be mitigated.	Please refer to recommendation T1-1. Mitigation for potential impacts to all VCs are discussed in section 5. Project specific mitigation will be developed at project level.
528	General comment #7: Some Treaty land around Mi'kma'ki is now submerged due to sea level rise. However, it was not always the case, and some offshore territory may be part of Mi'kma'ki.	Noted. This is addressed in sections 4.2.7 and 5.5.8.
529	Section 5.6.4 (pg 187 Table 5.6) General comment #10: As climate change continues to have serious impacts on the ecosystems, we see more movement of fish and fish-like species. This will eventually result in the movement of fisheries and fishing areas. The proposed Tier 1 PDAs are located in areas where the overlapping with fisheries is the least prominent. However, it may change as temperatures evolve and result in a complicated coexistence of offshore wind and fisheries, one of the main sources of revenue for First Nations in Atlantic Canada. That is a great concern that should be highlighted in more detail in the proposed section.	The report acknowledges that climate change is likely to result in changes to the distribution of many marine species - not just fish. The unknowns related to climate change are discussed throughout the report and are especially noted in relation to marine species distribution in section 9.1.6.
530	Additional Comment #1: No mention of the potential effects of high-voltage direct current (HVDC) emissions. There are different types of cooling systems but open loop release heated water back into the ocean which may have impacts on the ecosystem immediately surrounding the stations. Such impacts were mentioned in the report for NFLD but not for NS. More details are required	Text added to 5.5.7.
531	Section 5.7.1 Employment and Economy forecasts that "focusing early on supply chain preparedness and labour availability and training can help promote the local capture of benefits." (pg. 198) If OSW commits to hire locally, it is important to apply GBA Plus at every stage of the project, including the forecasting of the project impact on the local employment and economic opportunities. Section 4.6.1 Demographic Profile (pgs. 139-144) offer some useful demographic profile of the region, although there are some data gaps (e.g. the Mi'kmaq and intersectional analysis of the inter-provincial and international migrants who were the largest contributors to the population burst in the region since 2021). However, there is no discussion on how this data will be used to address and assess the labour preparedness and local capture of benefits in section 5.7.1, and there is no mention of application of GBA Plus. Consider adding the following (in red) to 5.7.1 Employment and Economy: "Once OSW project development details are understood, these issues can be better assessed and addressed. GBA Plus will be applied to capture local work force and economic opportunities. OSW project will utilize, analyze, and monitor the demographic profile of the region and ensure effective	Text added to 5.7.1.

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	interpretation of project impact on diverse groups of population." When GBA Plus is applied to employment and economy considerations the Proponent can better address local and community employment, educational, and culturally specific needs. For example, workplace policies can be developed to reflect concerns for flexible work schedules to accommodate cultural needs, and for cultural sensitivity and antiracism training. There is further guidance on GBA Plus and Employment provided by IAAC in Table 1: What Difference Does GBA Plus Make? https://www.canada.ca/en/impactassessment-agency/services/policyguidance/practitioners-guide-impactassessment-act/gender-basedanalysis.html	
532	Exclusion from these areas because of offshore wind development will result in direct and irrecoverable loss of fishing access. Ocean quahogs, like other clams, bury in sandy bottom after maturing out of their larval stage and are then immobile. They do not relocate to other areas and the biomass in that region cannot be made up by harvesting elsewhere.	Please refer to section 5.6.4 which acknowledges permanent exclusion from fishing areas due to
533	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	Potential impacts of OSW to traditional and cultural activities and sites of significance that exist in the nearshore will be determined at project level through an engagement process. See response to comment # 497.
534	Page 171, in section 5.5.6 – suggest that the committee refer to the Geological Survey of Canada – Atlantic’s seabed disturbance modelling work (https://doi.org/10.4095/331499), which can quantify the risks associated with seabed disturbance.	Noted. Additional research into risks associated with seabed disturbance can be done on a project-by-project basis.
535	I am concerned about birds and bats being hit by turbines. Please keep the animals safe from the turbines. I would suggest working with Hope For Wildlife to make the turbines as animal safe as possible.	Noted.
536	Please do not harm animals with this project. Please do not use animal testing for pollution and effluent monitoring. Please work with the Canadian Centre for the Alternatives to Animal Methods. Please only use non-lethal ways to live with geese, beavers, and other wildlife. Develop a Living With Coyotes program with the animal welfare organization Coyote Watch Canada. Please only use non-lethal ways to manage wildlife.	Noted. Impacts of OSW to VCs are discussed in sections 4 and 5.
537	It does not appear as though anyone has raised the issue related to the effect the OSW farms will have on the scientific surveys DFO conducts each year and the impact it will have on future resource	Added to effects tables in section 5.

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	assessments. The banks are sampled intensively each year with a bottom trawl and are areas of high abundance at both adult and juvenile life stages. Partial or full exclusion from these areas could lead to under-estimation of population abundance and incoming recruitment for many key commercial species	
538	Before concluding our comments on the topic of tiered planning and assessment, we note that, in the Draft Report, the Committee discusses the regulatory framework for offshore wind development that is taking shape under the Canadian Energy Regulator Act (“CERA”) and describes it as being “robust”. Because the Offshore Renewable Energy Regulations being established under CERA are expected to provide a template for corresponding regulations under the amended Accord Acts, we take this opportunity to note that in our submission on the proposed text of those Regulations, we emphasized that “they fail to establish necessary requirements and meaningful guidance for the environmental and socio-economic assessments that project proponents will need to conduct when seeking authorization for offshore renewable energy projects”. We encourage the Committee to review our submission on the proposed Regulations and reconsider its description of the evolving CERA regime as being “robust.”	The Committee cannot comment on the ECEL submission regarding these regulations. The reference of robustness was made in the context of the regulatory framework.
539	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 factor of increased steaming time has been added to Section 5 (Tables 5.6 and 5.7). Compensation requirements will be considered when compensation guidelines are developed. Further details around this are beyond the mandate of the Committee.
540	ECCC guidance for wind farm development in Canada recommends that wind turbines should not be installed in the 0-10km distance from a Radar, with consultation and mitigation measures recommended for all installations within 60km of any Radar. Recommended text: <ul style="list-style-type: none"> • Wind turbine height and distance from weather radar are key parameters when considering potential interference with the functioning of ECCC weather radars. • Proponents should write to adarsmeteo-weatheradars@ec.gc.ca in order for ECCC to conduct a preliminary visibility analysis. 	This change has not been made. Specifics around spacing of wind turbines to radar will be discussed at the project level.

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541	<p>We acknowledge that the Strategic Assessment of Climate Change (SACC) is referenced in Table 5.3. In addition to this, wording should be included referencing the SACC outside of mitigation measures. Recommendation: We recommend the inclusion of the following wording above Table 5.3: "Offshore wind projects, if designated, would need to follow all applicable climate change and greenhouse gas (GHG) guidance presented in the Strategic Assessment of Climate Change and the Technical Guides, which may include consideration of the GHG emissions from the construction (including pre-construction), operations, and decommissioning phases of off-shore wind projects, as well as mitigation measures."</p>	Reference to the SACC is already included in Table 5.3.
542	<p>Comment 3: Table 5.3 (page 179) lists mitigation measures but does not include reference to the use of other low-carbon fuel types. Recommendation: adding a mitigation measure referencing the use of low-carbon fuel types such as hydrogen or biofuels as a GHG mitigation measure.</p>	Added to Table 5.3.
543	<p>Page 175 states "Feathering blades during high bat activity periods is therefore being adopted..." Recommendation: Please clarify what feathering is. Feathering is a curtailment measure that involves adjusting the turbine blade angle so that they no longer produce force that spins the rotor. This measure is being adopted increasingly to mitigate impacts on bats.</p>	Added as a footnote.
544	<p>Page 184 states, "the operations and maintenance phase of OSW development pose the greatest potential threat to aerofauna (birds, bats and insects) including collision with moving turbine blades and displacement due to avoidance of turbines. The presence of infrastructure and activity can also attract birds and bats to roost on structures and vessels. Attraction to new foraging habitats created by underwater structures may also lead to displacement from flight/migratory corridors and foraging areas while artificial lighting can cause disorientation at night or attraction to turbines during inclement weather events."</p> <p>ECCC in partnership with the Biodiversity Research Institute developed a review and assessment of the available (or proposed) mitigations for aerofauna. This assessment inventoried the available knowledge on mitigations that are proposed only, field-implemented, specifically tested for effectiveness, and had any evidence of being effective. This work has been captured in Gulka et al. 2024: https://www.biorxiv.org/content/10.1101/2024.08.20.608845v1. The NS Draft Report summary of mitigations for aerofauna can be expanded upon using this publication. Recommendation: Incorporate the assessments and review of impacts and mitigations to birds and bats from the Gulka et al. 2024 document.</p>	The RA Report is not meant to list all mitigative measures for all species. Detailed mitigation will be part of project specific impact assessments. Wording as suggested in the comment has been added to Table 5.5 and reference to Gulka et. al. was added to the reference section.
545	<p>In regard to table 5.5 Aerofauna – Effects, Mitigation, and Monitoring Measures (page 185), ECCC provided guidance on the monitoring that would be required, and included specific guidance on how to monitor for displacement impacts on aerofauna, using Motus towers, etc. This is an example of the</p>	The RA Report is not meant to list all monitoring measures for all species. Detailed monitoring will be part of project specific impact assessments. Reference to detailed

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	standards in places in various jurisdictions. Some synthesis of these documents would be useful. Recommendation: Incorporate monitoring considerations in the guidance documents submitted to the committee.	monitoring is noted and a link provided to the ECCC guidance.
546	5.5 and 5.6: The description of the Impact Producing Factors is inconsistent and unclear. For example, atmospheric emissions are an impact, while exclusion zones could be considered both an impact producing factor (e.g., fishing or ocean monitoring) and a mitigation measure (vessel safety). The content of each sub-section differs in the level of detail in terms of describing the impact and any associated mitigation measures. It is acknowledged that the following Section 5.6 speaks to some of these details, although the structure adopted between Section 5.5 and 5.6 lends itself to redundancy and separation of relevant and connected material.	Noted.
547	Noise and Vibrations (page 170): The organization/structure of this section is difficult to follow. It jumps between noise and vibrations and between the various phases of OSW farm development (e.g. pile driving/construction vs operation). To ensure key messages are clear to the reader, re-organization is recommended. While this section represents a very high-level overview (i.e., only refers to ‘marine life’ or ‘marine species’ in general), the scope of each paragraph seems inconsistent. It directly addresses only one of the impacts of noise on marine species (auditory injury) and does not include others such as behavioral effects. This section also does not consider differences around the impacts of vessel noise, helicopter noise, pile driving, seismic surveys (only touching on vibrations from seismic). While this section considers impacts on marine species, the surrounding sections (e.g. 5.5.2 – artificial lighting and 5.5.5 vessel activity) do not consider impacts on marine species. The scope and level of details across these sections should be consistent.	The purpose of the RA is to identify the broad impacts of OSW to VCs. More specific detailed impacts associated with OSW (including noise and vibrations) will be identified at the project level and considered in the project impact assessment.
548	Electrification of subsea power cables (page 171-172): With regards to electrification of power cables, suggest additional context to describe potential impacts on aquatic life. Some information for consideration: <ul style="list-style-type: none"> • EMFs may cause sensitive species to become attracted, deterred, or disoriented due to these produced fields, impacting their feeding or migration success (Westerberg and Lagenfelt 2008; Gill and Bartlett 2010; Tricas and Gill 2011; Hutchison et al. 2020, Gillson et al. 2022, Walker et al. 1992), • If organisms spend extended periods of time near cables, they may have direct negative effects on health (Öhman et al. 2007); sublethal effects. • Further research is needed to fully understand these impacts on key sensitive species, acknowledging this is discussed in section 9.3.5 	Text on EMF added.
549	Presence of infrastructure and Table 5.4 (page 171-172, 181): With regards to the effects of presence of infrastructure, consider including potential impacts as follows: <ul style="list-style-type: none"> • Spread of aquatic invasive species (AIS) that may adhere and colonize artificial reef structures (De Mesel et al. 2015; Riefolo et al. 2016; Degraer et al. 2020). 	Text added.

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	<ul style="list-style-type: none"> • Change in food supply. • Change or loss of habitat structure or cover. • Behaviour changes (i.e., species assemblages, aggregation, trophic interactions). For mitigation, avoidance of sensitive habitats (i.e. corals, sponges, eelgrass, other submerged aquatic vegetation) is of primary importance. 	
550	<p>Movement of turbine blades (page 174-175): Offshore wind farms may affect physical oceanographic conditions, including impacts to ocean circulation both vertically and horizontally. Research has looked at the mixing of oceans and turbulence created by offshore wind farm foundations (see: Schultze et al. 2020) but the effects of blade operation will need to be studied within Canadian waters under varying conditions and array designs.</p> <p>Additional potential impacts to consider during operation: Cumulative effects - Change in circulation/hydrodynamics; change in stratification and upwelling dynamics; changes in food web, productivity, and distribution of food</p>	Text has been added with respect to OSW and ocean circulation.
551	<p>IPFs, and Table 5.2 (page 177): Consider adding aquatic invasive species as a potential impact to section 5.5. “Atmospheric emissions” was seemingly not evaluated against marine mammals and sea turtles and fish and fish and fish habitat, however potential increases in emissions could contribute to ocean acidification which would affect these valued components.</p>	Noted.
552	<p>Fish and Fish Habitat, Marine Mammals and Sea Turtles (page 180): In addition to “noise and vibrations associated with site assessment surveys (e.g., sonar and high resolution geophysical/seismic surveys)” it should be noted that there is also the potential for noise and vibration impacts generated by the construction phase (e.g., pile driving and installation of wind turbines) and operations (see above).</p> <p>In addition to “disrupted migration routes”, consider other important fish, fish habitat and marine mammal functions that might also be impacted, including but not limited to spawning, foraging, and breeding.</p> <p>Regarding the potential for entanglements with mooring lines and cables, it should be noted that this is likely referring to secondary entanglement, as the risk for a marine mammal or sea turtle to become directly entangled in large, high-tension cables is unlikely as compared to entanglement in fishing gear.</p>	Text added.
553	<p>Table 5.4: <u>Table organization</u></p> <ul style="list-style-type: none"> • It is difficult to distinguish which key mitigation and monitoring measure is associated with each Impact Producing Factor. Consider adding rows to Table 5.4 for clarity. • In the Note section of Table 5.4, clarify the meaning of “(P).” 	Some changes have been made to the text however the table organization remains. The TOR specifically notes the scope of the RA which is to address the marine aspects of OSW so cabling and overland components are not addressed (please refer to the TOR for details). Some general wording around additional mitigation has been

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	<ul style="list-style-type: none"> • DFO recommends consideration of all aspects of OSW development including cabling to land and overland to the power grid. This will reveal other Impact Producing Factors (IPFs) to include in Table 5.4, such as removal of materials and detonation in or near water. • “Physical and psychological injury”, replace with “Physical injury and physiological impacts.” <p>Mitigation and monitoring</p> <ul style="list-style-type: none"> • An additional mitigation measure to consider: Develop and implement a shutdown plan to be used for planned or unplanned breaks in the sequence of piling including when marine mammal and sea turtle species are detected within or approaching the mitigation zone. • The underwater noise and vibration mitigation listed should include monitoring for marine mammals prior to start-up / ramp-up of noise generating activities. • Acoustic modelling should be included as a key planning and monitoring measure. See appendix II for recommended measures for consideration. • Consider adding mitigation and monitoring measures regarding the deposit of deleterious substances. See additional information provided in appendix II for DFO recommended best practices for the consideration of the protection of fish and fish habitat. • “Exclusion buffer zones during pile driving activities” is listed as a noise and vibration mitigation measure. In addition to pile driving activities, also consider mitigation zones for possible seismic surveys: https://www.dfo-mpo.gc.ca/oceans/publications/seismic-sismique/index-eng.html • In addition to following Canada’s Ocean Noise Strategy, please consider the following mitigation measure for vessel traffic: Refer to Notices to Mariners; Section A2 - “Marine Mammal Guidelines and Marine Protected Areas” (or any relevant updates) available here: https://www.notmar.gc.ca/annual. • If cables cannot be adequately buried to reduce EMF to an acceptable level (on a case-by-case basis), an effective monitoring program should be implemented to measure EMF outputs during operation. • “Changes in habitat quality/quantity...etc.” are identified in the Potential Effects column. However, there are no Key Mitigation or Monitoring Measures associated with this Potential Effect, other than monitoring the long-term reef effects. DFO recommends adding research and monitoring measures for the turbulence in the air above the sea caused by turbine blades affecting mixing processes and biological productivity (i.e., circulation/hydrodynamics, change in stratification, upwelling dynamics, etc.). 	<p>noted (e.g., consideration of marine mammal observers) but specifics (e.g., observers for sea turtles and resulting shut down). The mitigation table also notes ramp-up of activities as well as sound dampening measures to mitigate the effects of underwater sound on marine species.</p>

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	<ul style="list-style-type: none"> The only reference to SARA or Species at Risk considered under the key mitigation and monitoring measures for fish/marine mammal/sea turtles is “Baseline surveys to identify critical habitats, seasonal species distribution and monitoring protocols (SA)”. Monitoring in existing critical habitat areas or areas considered important for species at risk could be added. Additionally, avoidance of SARA species/habitat should be included. The following monitoring measure is unclear: “monitoring of moorings for entanglement of marine debris, e.g. passive technologies (O&M).” Can this be clarified? Recommend replacing “coral and sponge hotspots” with “coral and sponge significant benthic areas”. Significant benthic areas are defined by DFO Science and are available online. 	
554	Table 5.6: Not every impact appears to have a corresponding mitigation or monitoring measure. For example, no measures appear to apply to waste management. In addition, aquatic invasive species is an impact worth considering for inclusion here.	Noted.

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Section 6. Potential Development Areas		
555	Reconsider calling constraints "primary" and "secondary" as these seemingly ranks them on importance and makes the fishery seem less important	Acknowledged and amendments have been made to the text in section 6.1-6.4.
556	Section 6.5 - Change wording of “immediate consideration” Clarify rationale prioritization of Tier 1 and 2 PDAs	Modifications have been made in Section 6.5 and 6.6 to outline the rationale of the tiered approach to PDAs.
557	When discussing the potential impacts on commercial shipping, specifically referring to Figure 4.15, it appears as though within roughly 100 kilometers of shore we are seeing a significant number of vessels on a day-to-day basis. Specifically looking at traffic in the PDAs of Sydney Bight, Canso Bank, French Bank, and LaHave Basin, there appears to be significant vessel traffic in these areas, and we are wondering how heavily this has been considered and/or weighted in the decision for designating these areas? (Section 4.6.3 - Page 149)	<p>As discussed in section 6.3, one reason that the Committee recommended the 25 km buffer was to reduce conflict with areas of heavy vessel traffic and marine shipping routes.</p> <p>The intent of developing PDAs was to identify broad areas within the RA Study Area that represent technically feasible locations for OSW development, while minimizing potential conflicts and adverse interactions on a large scale.</p> <p>The Committee are aware that vessel traffic occurs within each PDA to varying levels (Figure 4.17). While the map acknowledges certain fishing traffic has been considered, not all fishing activity is included. Note there is additional work being undertaken by GCIFA. Detailed consideration for the level of vessel traffic occurring in these areas would be identified at the project level. Note that transportation</p>

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		corridors have been incorporated into offshore wind development elsewhere.
558	<p>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.</p> <p>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.</p>	See modifications made in section 6
559	Is any of the baseline study work that is recommended currently being done in the PDAs? If not, when will this be undertaken and how does the Committee see this fitting into the greater process? Is there an established criteria for OSW baseline studies like what is done for onshore wind farms?	The approach to addressing baseline studies is addressed under recommendation T1-1. The timing of when these studies will be initiated and how the details of the recommendations will be addressed is unknown at this time and will depend on how the Ministers and the CNSOER decide to proceed.
560	Participant concerned about impacts to fishing in Canso Bank area – which has changed from a Tier 1 to a Tier 2 area.	As per section 6.6, Tier 2 PDAs are viewed as requiring additional investigation and stakeholder/rightsholder engagement before being elevated to the Tier 1 category and designated as wind energy areas.
561	How will Climate Change affect Wind Development Areas, physical changes and placement. How is industry accounting for this?	<p>Offshore wind development is being considered as a response to the impact producing factor of climate change. The Committee has recognized that climate change has the potential to change multiple facets within the marine environment such as ecological changes and the increase the frequency and scale of extreme weather events, e.g., hurricanes, which may cause damage to offshore wind farm equipment and increase uncertainties.</p> <p>Changes to OSW placement and technology to adapt to physical change will be decided on a project-basis.</p>
562	How was site selection criteria determined for PDAs, including social criteria?	Site selection of PDAs is described in sections 6.1-6.4. The Committee utilized comments and information provided through engagement to support PDA identification.

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563	What is the differential in the criteria when looking at different PDAs? What caused it to become Tier 2?	Clarification of differences between Tier 1 and Tier 2 PDAs have been provided in section 6.5.
564	(Pg. 20) Summary, PDA - How did the site selection criteria evolve to include the new areas of LaHave Basin and Misaine Bank? - If the criteria remain unchanged, why were these sites not identified in the original analysis? - If the criteria were revised, what specific changes justify their inclusion in the updated map?	Rationale for the inclusion of LaHave Basin and Misaine Bank is provided in section 6.6.
565	Having sites that are mainly floating will be challenging. We don't have the population or demand that the US has, economics are going to be challenging. Wish there was more fixed bottom, especially in the 25km buffer zone	Noted.
566	The ability for incursion into the buffer doesn't seem clear	Refer to section 6.3. A potential incursion into the buffer would require that the regulatory authorities, in conjunction with key interests, be addressed at the project level.
567	Western Emerald Banks (W.E.B) is groundfish protection zone closed to fishing. KMKNO considers the ground disturbance of an OSW there would be detrimental to the conservation objectives of the site.	Refer to updated section 6.
568	The 25km coastal buffer zone is within range of typical global standards. Consideration may be given to greater setbacks in more sensitive regions or those with greater elevation.	Noted.
569	KMK has given considerable time and effort into providing feedback for DFO's Draft Marine Conservation Network. The federal Marine Protected Areas (MPA) standards came into effect in 2019 and while offshore wind is not directly mentioned in the standards, they are meant to safeguard MPAs against industrial activities taking place within MPAs to strengthen the protection level and standardize MPA function. KMK respectfully requests the RA consider that no development will be considered in federal MPAs or other legislated areas of marine conservation. To that end, we ask that the PDA that overlaps with the Western Emerald Bank Marine Refuge be scaled down to scope out the Marine Refuge from the PDA. We see offshore wind as a contributor to a more sustainable future and therefore should not be competing for ocean space with conservation areas but rather working alongside them to push Canada towards a more sustainable economy.	This feedback has been incorporated into Table 6.7. Modifications have been made to the report in section 6.
570	We are concerned that the RA, in developing its PDAs, did not take into account the activities of the offshore Sea Scallop fishery and did not take into consideration the life history of Sea Scallops. While the initial PFDAs appeared to take some of the limited fisheries information into account, the offshore scallop fishery has apparently been disregarded with the development of PDAs, despite the ECOSF providing additional landings information. The additional landings data were meant to better show historic footprint of this fishery on the banks in question, and given the limited availability of	The Committee appreciates the feedback provided regarding additional scallop landings information. As discussed at the end of section 6.6, the Committee would like to reiterate that the intent of developing PDAs was to identify broad areas within the RA Study Area that represent technically feasible locations for OSW development, while minimizing potential conflicts and adverse interactions on a large scale. It was not the intent of the Committee to microsite

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	commercial scallop habitat, that the RA should not allow for these to be developed. However, as noted, the RA has greatly expanded the footprints of the Sable/Western and Middle Bank PDAs and therefore seems to be viewing these historic scallop fishing grounds as appropriate for immediate development.	potential fishery data that is subject to change prior to OSW development, especially in the face of climate change.
571	The ECOSF's interest in Sable/Western and Middle Banks is also demonstrated by the amount of time and resources they spend surveying these banks. As noted in the ECOSF supports DFO's scallop surveys and these surveys continue to show that there are significant and healthy scallop populations on these banks (albeit not of commercial size at the moment and therefore provided with no weight in certain analyses to date). You will note that when Sea Scallops were successfully growing to commercial sizes in significant numbers, that Sea Scallop landings and TACs in these areas were considerably higher than the time series used in the Marine Planning Atlas. This period of increased abundance predates the impacts of climate change that are currently being observed, meaning that these areas of importance might play an even more important role for the ECOSF in the near future.	The intent of developing PDAs was to identify broad areas within the RA Study Area that represent technically feasible locations for OSW development, while minimizing potential conflicts and adverse interactions on a large scale. The location and currency of scallop beds should be discussed and assessed at the project level.
572	We are concerned that the RA did not take into account the life history of scallops and did not undertake a study of the potential oceanographic/hydrodynamic impacts on Western/Sable and Middle Banks before designating them as PDAs and PFDA's. Permanent Sea Scallop beds are generally found in areas where oceanographic features ensure a regular larval supply and food availability along with suitable temperatures and substrates. Sea scallops have sexes and reproduce by releasing sperm and eggs into the water column, where fertilization takes place. After fertilization occurs, scallops spend about 4-7 weeks in the water column in larval stage. After feeding and growing in the water column, the larvae then search for suitable substrate on which to settle and they become less mobile as they mature. In most of these early stages Sea Scallops are dependent on local hydrodynamics and most banks of importance in this fishery have gyres and other hydrodynamic features that help distribute Sea Scallops and their food. This can perhaps be inferred by the distribution of Sea Scallops landings on Western/Sable Island Banks as a ring around shallower areas. And, while individual banks are managed so as to avoid local depletion, there is a good possibility that there is demographic connectivity between management areas and that interference with hydrodynamic conditions would imperil those connections. There have been numerous studies on hydrodynamics on the Scotian Shelf and the life histories of benthic invertebrates that should have been reviewed as part of a credible regional study. While we support the use of DFO's Marxan with Zones Approach,	<p>Feedback has been summarized in Tables 6.4, 6.6 and 6.7. The RA is meant to be broad and high level without the ability or mandate to conduct in depth studies. Information was assessed from analyses already completed (i.e., Marxan).</p> <p>As presented in the considerations column in Tables 6.4, 6.6 and 6.7, a detailed analysis of constraints and potential impacts (including fisheries) will need to be performed within any area of interest for OSW development at project level. Should future OSW development be proposed in areas potentially affecting specific fisheries, the Committee urges relevant fishery representatives to actively participate in the impact assessment process.</p>

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	we urge the RA Committee to recognize that this is not dispositive of DFO's role in assessing fish and fish habitat impacts later on and furthermore that DFO should make all of its experts available for consultation as we better understand where development is likely to occur.	
573	Sea Scallops and the ECOSF stand to be profoundly impacted by offshore renewable energy development. The gear used by the ECOSF cannot be used in or near wind farms and therefore selection of WEAs must be sensitive to this usage. While the ECOSF does fish on multiple offshore banks, this should not be interpreted that it is acceptable to develop wind energy in historic scallop fishing beds such as those on Sable/Western and Middle Banks. As discussed, the ECOSF is a capital-intensive fishery and achieves efficiency through good planning, which in turn demands that operators have flexibility in harvesting scallop 'pulses' when and where they arise. To this end, any loss of scallop beds will materially impact the license-holders in the fishery. These complexities must be taken into account in the RA's final report and by governments and regulators as wind development progresses (as required under clause 98.7(c) of the new Accord Acts).	Noted.
574	The Draft Report categorizes sensitive areas including ecologically and biologically significant areas into secondary considerations, which allows offshore wind energy (OWE) development in these areas, although avoidance and mitigation measures should be taken. The sensitive areas should be considered as primary constraints that prohibit OWE development. The Conference of the Parties to the Convention on Biological Diversity recommends that the Parties to the Convention stop activities that degrade or cause the loss of ecologically important ecosystems and habitats and prevent unsustainable human activities that have significant adverse effects on marine and coastal areas, particularly the ecologically or biologically significant areas.	Refer to modifications in section 6.
575	The Draft Report does not expressly state the effects of primary constraints. Identifying current marine protected areas, critical habitats, national park reserves, and marine bird sanctuaries signifies that these areas must be excluded from OWE development. In other words, based on the precautionary principle, OWE should not be developed in these areas. This matter must be clearly stated and reiterated in the recommendations of this Report.	Refer to modifications in sections 6.1-6.4, which address the constraints process that were used to identify PDAs.
576	Buffer zones for marine protected areas should be considered and recommended because it appears that some Potential Development Areas (PDAs) such as Sydney Bight and Sable Island Bank are close to marine protected areas.	Noted.
577	Any effect of OWE development on the network of marine protected areas as well as any potential marine protected areas should be considered in the Draft report.	Refer to modifications to section 6.

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578	Section 6.3 - The Committee should develop a more comprehensive and structured approach to managing secondary constraints, particularly with respect to ecological and economic factors, to ensure that OSW development is feasible and sustainable without significant negative impacts on sensitive marine environments, fisheries, or other key sectors.	See modifications to section 6.3.
579	Section 6.4 - The Committee should ensure that adaptive management includes a framework that prioritizes the concerns of Indigenous people and fishers. This framework should actively address impacts on their rights and interests, especially regarding traditional fishing practices or culturally significant areas. The report should also outline specific measures for accommodation, such as compensatory actions or assurances that their concerns will be fully addressed. Additionally, research programs should be co-designed with these stakeholders to incorporate their perspectives into decisions about project boundaries or buffer zones.	Noted.
580	Section 6.6. - For all PDAs, a priority on understanding the distribution of fishing activities and vessel traffic patterns, particularly in Canso Bank, LaHave Basin, and Sydney Bank, where seasonal and species-specific concentrations of fishing occur. 2. Implement buffer zones around key fishing grounds, seasonal restrictions on construction activities, and mitigation measures to minimize disruption, such as adjustments to the placement of turbines, cable routing, and careful scheduling of construction periods. 3. Ongoing engagement with the fishing community, Indigenous groups, and other stakeholders collaboratively address concerns and ensure mutually beneficial outcomes.	Noted.
581	Section 6.6 - A more robust plan detailing how to minimize and mitigate risks to the marine environment, particularly for sensitive species, is required. The report should include more detailed strategies for avoiding critical habitats, as well as strategies to address the interaction between OSW development and fisheries. 2. Given the overlap with sensitive marine species and critical habitats, it is necessary to undertake detailed benthic habitat surveys, species at risk assessments, and to fully understand the ecological context of the PDA. These should be done early in the planning phase to avoid surprises during project development.	Noted.
582	We request the Committee to provide additional details about the methodology used to determine how much each factor (physical, ecological, socio-economic) contributed to the overall weighting and analysis of scenarios and options. Was this an established framework/protocol (e.g. Multi-Criteria Decision Analysis) or was it primarily based on expert opinion?	Site selection of PDAs is described in sections 6.1-6.4. The methodology explained in section 2 includes several models which in some cases included the weighting of specific constraints factors; these were considered by the Committee in its PDA identification

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		process. The Committee did not undertake any weighted modelling of its own.
583	(2.0 OSW) - We request clarification on how the capacity of the selected PFDA(s) has been assessed to ensure they can feasibly support OSW projects of 1 GW or larger and if there are specific criteria or modeling methodologies used to determine the suitability of these areas for such large-scale developments?	See Table 6.2 in section 6.6 for theoretical OSW megawatt capacities of each PDA. While preliminary estimations can be made regarding the capacity of an OSW project based on the size of a PDA, it is not possible to evaluate the suitability of each PDA in its entirety at the RA level due to lack of detailed site-specific information, and OSW project design details. The Committee have used studies and modelling discussed in section 2 to support PDA identification, but this information must be expanded upon with site specific assessment and data to understand OSW development opportunities and capacity. Should OSW development be proposed within a certain PDA in the future, the potential capacity will be dependent on these site-specific conditions and will be a major factor for a developer in determining the economics of the project.
584	(6.0 - PFDAs) - We request that the Committee include recommendations around how critical habitats should be considered as part of ongoing management of OSW developments. This should include requirements for baseline studies conducted by proponents to evaluate the potential presence of critical habitats for known species at risk, prior to development.	Site specific evaluation of potential sensitive habitats (including critical habitat) would take place at project-level stage when an OSW development is proposed. Regulatory agencies involved at the project-level stage would be responsible for identifying requirements of OSW developers including baseline studies and assessment of potential risk to critical habitats as a result of OSW development. Also, the SSCRI (recommendation T1-1) would have the mandate to identify priority research issues.
585	Section 6.5 (pg. 210, 20) Tier 1 areas are defined as "recommended for immediate consideration as prospective Wind Energy Areas" - You may want to change the wording here. There are many uncertainties remaining and a lot of additional research that should be conducted prior to considering these areas for offshore wind development. Therefore, they should not be recommended for "immediate" consideration.	Clarification of differences between Tier 1 and Tier 2 PDAs has been provided in section 6.5. Additionally, the wording " <i>recommended for immediate consideration as prospective Wind Energy Areas</i> " has been modified to " <i>are recommended as areas for priority consideration as prospective Wind Energy Areas</i> ".
586	Section 6.4 (pg. 209) Incursion to the buffer zone - This part needs to be clarified. The current explanation seems to provide accessible loopholes for industry proponents to avoid respecting the mitigation measures recommended. If judged necessary, it should be introduced and discussed on a project-by-project basis. It does not seem necessary to be included there.	Refer to the response for comment # 567.
587	Section 6.6.3 (pg. 231) French Bank - Mention that the area is heavily fished or limited by fisheries coexistence, however, there is no mention of Food, Social, and Ceremonial (FSC)	This feedback has been included in Table 6.5. As noted in the "Considerations" column of Table 6.5, interactions between OSW

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	fisheries and the importance of the area for culturally significant diadromous fish (e.g., American eel and Atlantic salmon).	development and fisheries (including Food, Social, and Ceremonial fisheries) will be determined at project level.
588	Section 6.6.5 (pg. 246) Western/Emerald Bank - Mention that the area is heavily fished or limited by fisheries (coexistence, however, there is no mention of Food, Social, and Ceremonial (FSC) fisheries and the importance of the area for migratory species (see previous comment).	This feedback has been included in Table 6.7. As noted in the “Considerations” column of Table 6.7, interactions between OSW development and fisheries (including Food, Social, and Ceremonial fisheries) will be determined at project level.
589	Section 6.6.7 (pg. 259) LaHave Basin - This is an important area for diadromous fish migrating from the ocean to fresh waters and vice versa. This includes two culturally important species for the Mi'kmaw: the Atlantic salmon (<i>Salmo salar</i>) and the American eel (<i>Anguilla rostrata</i>). Juvenile American eels (e.g., elvers) are also found in the area and harvested by Mi'kmaw communities. This part of the report should mention the importance of Food, Social, and Ceremonial (FSC) fisheries, our concerns about the status of these migratory species, and the potential impact of offshore wind development in the area.	This feedback has been included in Table 6.9. As noted in the “Considerations” column of Table 6.9, interactions between OSW development and fisheries (including Food, Social, and Ceremonial fisheries) will be determined at project level.
590	“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.	Refer to buffer rationale in section 6.3, which includes a discussion of the circumstances where an incursion may be justified.
591	<p>Potential Development Areas (PDAs):</p> <p>Members of the NSFAEE continue to discourage any proposed development outside of the low conflict areas provided to the Regional Assessment Committee in the February 2024 NSFAEE submission. These areas were developed and recommended by the harvesting sector based on known usage patterns that may not be well captured by other data sources used in the consideration of areas for development. For areas outside of these self-identified regions, we are collectively concerned that insufficient information exists to provide clear guidance for future development.</p> <p>Members are concerned that the expansion of the boundaries and addition of new PDAs was undertaken without full consideration of impacts and appear to be based on loose requests from regulators and the offshore wind industry, while at the same time ignoring requests from the harvesting sector to reduce/eliminate areas of known conflict.</p> <p>For instance, submissions from the Guysborough County Inshore Fishers Association and the Seafood Producers Association of Nova Scotia both clearly defined areas of historic and current use by the harvesting sector that overlapped with the original Proposed Future Development Areas presented in the interim report – this input was generally ignored as</p>	As per the methodology described in sections 6-6.5, the intent of developing PDAs was to identify broad areas within the RA Study Area that represent technically feasible locations for OSW development, while minimizing potential conflicts and adverse interactions on a large scale. It was not the intent of the Committee to microsite potential fishery data that is subject to change prior to OSW development, especially in the face of climate change. The Committee recognize that development of an OSW project is likely to impact existing ocean users to some degree, but at this early stage of the industry, producing prescriptive areas for development is not possible given the lack of existing data available. Should OSW development be proposed in a given area, micro siting, avoidance of conflicts, adaptive management and coexistence will be crucial to the understanding of potential impacts to the fishing industry. It should be noted that the spatial scale of developing 5GW of OSW power within the PDA areas

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	<p>the footprint the PDAs was expanded three-fold and created a potential for large conflicts with the fishing industry. This naturally creates some level of concern as to whether input from the harvesting sector is being integrated into the decision-making process.</p> <p>The addition of two new areas without due consideration of existing activities is concerning. The newly minted Lahave Basin and Misaine Bank sites are heavily fished by a variety of sectors and encompass areas that represent the entire near- and mid-shore footprint of the fishery for certain key species. The boundaries of these sites clearly require discussion and refinement in consultation with the fishing industry before any further consideration is given to seabed tenure.</p> <p>We agree with the RAC that there continues to be substantial gaps in the understanding of the spatial footprint of the fishery as described by DFO records and argue that this information must be augmented by direct input from the fishing industry. This clearly underlies the importance of meaningful engagement of the industry prior to the identification of candidate areas for offshore wind development.</p> <p>All areas identified as PDAs contain some level of fishing effort and are deemed important to the harvesting sector to varied degrees. While this is noted in the site-specific summaries, we are concerned that those descriptions understate the level of usage and interest in these areas by the harvesting sector.</p> <p>We encourage the RAC to review previous submissions from NSFAEE and its members which provide clear guidance on how boundaries should be further modified and integrate this input in the final site layout. We continue to encourage that any development should be focused within those low-conflict areas self-identified by the NSFAEE.</p>	<p>enables an extensive amount of micro siting to minimize potential conflict.</p>
592	<p>Potential Development Areas (PDAs), which have the greatest opportunity to negatively impact Clearwater’s harvesting operations. Most important of these is Sable Island Bank, where Clearwater harvests a significant ocean quahog resource. There is a significant ocean quahog resource of Sable Island Bank, as illustrated by the last scientific survey of the resource, completed in 2003 (see Figure 1).</p>	<p>Table 6.6 has been updated to reflect this feedback.</p>
593	<p>It is an egregious oversight that the report makes no mention in the introduction of Section 6.6.4, starting on page 237 of the fishing operations on Sable Island Bank for offshore clam. It is also omitted in the tables on pages 241 to 245 excepting a short reference to surf clam via the NSFAEE submission.</p>	<p>Information on clam and quahog fishery has been added to Table 6.6.</p> <p>The Committee did not receive any information/data regarding the offshore clam biomass for ocean quahog or for the offshore clam fishery during the RA process. While the Committee acknowledges the 2003 data provided as part of the public comment period, the timeline does not allow for an analysis of this data. A note has been added that</p>

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		these fisheries should be examined in detail at a project level if projects are considered for the Sable Island Bank area.
594	Ocean quahogs are long-lived species, with the oldest aged specimen from the Scotian Shelf reaching 211 years old, while the oldest aged anywhere was 225 years old from the eastern US. While there have not been recent scientific surveys, it is reasonable to assume that the biomass on the bank is similar to that which was identified in the 2003 survey, which is the basis for the current total allowable catch of 11,587 tonnes.	Table 6.6 has been updated to reflect this feedback.
595	We refer the RAC back to the low conflict areas outlined in the initial NSFAEE feedback, which identified Sable Island Bank as an area with significant fishing potential, and therefore likely to be high conflict with offshore wind development.	Refer to responses provided for comment # 592.
596	The Report must incorporate information regarding the offshore clam biomass for ocean quahog and the offshore clam fishery in its report.	Quahog information has been added to Table 6.7.
597	Recommend that you revise your PDAs such that Sable Island Bank is no longer a candidate area.	Refer to responses provided for comment # 592.
598	<p>Sydney Bight</p> <ul style="list-style-type: none"> • It is noted that the ‘Red Ground’ lobster fishing areas have been substantially avoided for the PDA identification. However, a proposed transmission line from the PDA to Sydney would transverse this red zone. An understanding of this interface would be required to assess the permitting and stakeholder risks. • It has been noted that the depth of sediment may be insufficient for monopiles. This will require additional modeling to understand the risks of mobile sea ice for floating foundation types and may impact project concepts and add risk to development. A substrate evaluation would likely be necessary prior to foundation determination. 	Table 6.3 has been updated to reflect this feedback.
599	<p>Middle Bank/Sable Island Bank</p> <ul style="list-style-type: none"> • A greater understanding of the existing natural gas pipeline corridor benefits and routing advantages would be beneficial. This is dependent on a proposed project point of interconnection, and additional geotechnical analysis would be necessary to determine burial depth feasibility along with seabed mobility implications of an export cable route. • Middle Bank and Sable Island Bank are sizeable PDAs with capacity for several OSW development projects. An optimization of the area would be beneficial, including avoidance of marine and fisheries habitats to de-risk development opportunities. 	Tables 6.4 and 6.6 have been updated to reflect this feedback.

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600	Why the targeted areas in either T1 or T2 excluded "Banquereau Bank", given that it is an enormously accessible bank with a largely flat bottom substrate and a relatively consistent high wind velocity.	Rationale for the decision not to identify Banquereau Bank as a PDA is provided in section 6.4.
601	How did the actual targeted OSW banks pass muster?	Site selection of PDAs is described in sections 6.1-6.4. The difference between Tier 1 and Tier 2 PDAs is discussed in section 6.5.
602	Requesting reconsideration of the Regional Assessment Committee's recommendation to exclude the Strait of Canso region from offshore wind development at this early stage.	The Strait of Canso is not part of the RA Study Area.
603	If the recommended 25km buffer is not fulfilled, there will be 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).	Two Eyed Seeing has been added to section 6.3. If incursions into the buffer are made, then culturally significant areas will be considered in accordance with existing protocols.
604	Reject and discontinue consideration of PDAs that overlap with existing or potential MPAs or OECSs	Refer to modifications in section 6.
605	Respect Indigenous-led initiatives when planning sites for potential development, which includes, although not limited to, MPAs, Indigenous Protected and Conserved Areas, and other areas that are being conserved by The Mi'kmaq.	Indigenous protected and conserved areas have been acknowledged in sections 4 and 6.
606	Installation, maintenance and decommissioning of infrastructure needed for renewable energy would destroy the groundfish habitat that the Marine Refuge and prior fishing closure were designed to protect. While there may be no fishing activity currently taking place inside its boundaries, this area has been identified as critical in supporting healthy groundfish fisheries in adjacent waters. Undermining these conservation measures would potentially do long term harm to fisheries in the area. Recommend that the Emerald Bank and Sable Bank PDAs overlapping with the existing Western/Emerald Bank Conservation Area are removed from consideration and relocated, or at minimum, be relisted as Tier 2 sites, with further study and refinement under the precautionary principle to closer examine potential impacts on the identified conservation objectives of the Marine Refuge.	Refer to modifications made to section 6.
607	It is, therefore, unacceptable for the LaHave Basin PDA to overlap with the Pemsik National Marine Conservation Area (NMCA) as part of the Pemsik Conservation Mosaic in southwest Nova Scotia (Figure 1). The Pemsik NMCA is a Mi'kmaq-led conservation initiative with Parks Canada with a proposed marine boundary that upholds cultural values for the Mi'kmaq as well as protects important conservation values. This includes significant concentrations of eelgrass, saltmarsh, and kelp beds; spawning grounds for Atlantic	Noted. The LaHave Basin PDA is a Tier 2 PDA, therefore additional work, studies and engagement need to be completed to determine if OSW development is feasible. This work includes collecting and utilizing up to date baseline information, and completing meaningful engagement with the Mi'kmaq and all relevant stakeholders to evaluate potential conflicts referenced in this comment, e.g., eelgrass,

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	herring; important areas for seabirds and piping plover; and at-risk species such as white shark, American eel, Atlantic cod, cusk, and Atlantic wolffish. Priority should be given to Mi'kmaq initiatives, whether legally designated or not, to allow The Mi'kmaq of Nova Scotia to demonstrate self-governance in their unceded territory. Recommend the LaHave Basin PDA that overlaps with the Pemsik NMCA is removed from consideration or relocated.	saltmarsh, etc. and cultural values present in the Pemsik National Marine Conservation Area.
608	We do not support the development of OSW developments in legally protected and conserved areas in Nova Scotia's offshore area. We support the Committee's application of the precautionary principle, the Committee's recommendation of a 25km coastal buffer zone, and the Committee's removal of key legally protected and conserved areas from areas it has identified for consideration for future OSW development. We also strongly recommend that the Committee include a recommendation that the responsible federal and provincial ministers and the Governor in Council ("GiC") take action respectively to ensure protection of MPAs and OECMs, now and in the future	Refer to section 6.2.1, that notes that due to protected status or designation the Committee excluded several areas from consideration for OSW development at this time (e.g., MPAs, Critical Habitat, National Park Reserves, Marine Bird Sanctuaries etc.).
609	SeaBlue Canada agrees with the general approach that the Committee has taken and supports the recommendation to establish 25km buffer zones around the coast and Sable Island. However, as we discuss below, in order for Canada to achieve its conservation goals and to effectively protect marine biodiversity using tools like MPAs and OECMs, it is crucial that offshore wind be prohibited in all existing and future legally protected and conserved areas.	Noted.
610	The size of the proposed Western/Emerald Bank PDA has increased substantially from 6,570km ² to 13,170 km ² , effectively doubling the amount of space in and around the marine refuge potentially open to offshore wind development based on the Committee's recommendations. This spatial increase took place following the release of the interim report, meaning that the huge increase in potential size of the PDA, and the implications of that proposal, have not been subject to adequate public engagement or scrutiny. Therefore, we suggest that, at minimum, the two PDAs that overlap with the marine refuge must be listed as Tier 2 sites, with further study and refinement.	See revised text and rationale for PDA selection in section 6.
611	We respectfully submit that the Committee has not given adequate consideration to possible future interactions between OSW development and legally protected and conserved areas that are to be established or designated in the future. For example, Parks Canada is currently considering the Pemsik Mawa'tasikl Anko'tmu'kl ("Pemsik"), which includes a potential National Marine Conservation Area as a component of a larger Indigenous-led "conservation mosaic". Despite Parks Canada's recommendation that Pemsik be excluded from areas where OSW development might occur, one of the Committee's newly proposed PDAs (LaHave Basin PDA) partially overlaps with the Pemsik	Section 6.2.1 notes several designated protected areas that due to protected status or designation were excluded from consideration for OSW development at this time. The Committee has acknowledged the proposed Pemsik NMCA as overlapping with the LaHave PDA (section 6.6.7) however the LaHave PDA has been identified as a Tier 2 PDA. Section 6.4 notes that Tier 2 PDAs represent areas that show potential for OSW development but have neither been through the same level of engagement nor generated the same level of technical feedback as

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	study area. This area is identified as an AOI (i.e., an area of interest) in Figure 4.11, "Existing and Proposed Conservation Sites with Ecological Areas", of the Committee's Draft Report. We do not support OSW development in NMCAs and strongly urges the Committee to remove the Pemsik study area from the LaHave Basin PDA	Tier 1 PDAs and are viewed as requiring additional investigation and engagement before potentially advancing to Tier 1 status. This would include possible future protective designation of proposed areas.
612	We remain supportive of the NSFAEE identified LCAs and strongly support that any future offshore wind development be considered first and foremost for these areas. We highlight that expansions and additional areas in the latest draft RA report PDAs in comparison to these LCAs is concerning. Specifically, the addition of LaHave Basin as a Tier 2 PDA, as well as the large expansion of the Emerald Bank PDA. These areas are critically important to the silver hake resource residing in Northwest Atlantic Fisheries Organization (NAFO) Divisions 4VWX (within the RA study area).	Reference to silver hake has been added to Table 6.7 and 6.9 (Chapter 6.6.7). As per the process of identifying PDAs presented in Chapters 6.1-6.5, PDAs are not limited to NSFAEE identified Low Conflict Areas.
613	The expansion of the Emerald Bank PDA is now dangerously close to important silver hake fishing grounds, in particular on the northern edge of the boundary which is quite near the Emerald Basin (one of the few areas silver hake harvesters are permitted to catch their quotas). Additionally, LaHave Basin, is now identified as a Tier 2 PDA, another one of the few areas that the current silver hake fishery is permitted to operate within.	Summary of feedback has been added to Table 6.7 and 6.9 (Chapter 6.6.7).
614	As mentioned above, there is a long-standing DFO RV survey that occurs in the RA study area each year, which feeds critical data directly into a large number of commercial fish species stock assessments, including silver hake. Exclusion of scientific survey vessels from areas of offshore wind farms is another less obvious, indirect impact that can result from offshore wind development. Exclusions of scientific survey vessels from sections of the ocean may result in the inability for the survey to sample stock biomasses within that area and can risk underestimation of fish stock biomass levels. This could directly result in reductions in total allowable catches and quotas for the fishing industry.	Summary of feedback has been added to Table 6.7 and 6.9 (Chapter 6.6.7).
615	Parks Canada is working with the province of Nova Scotia, Indigenous partners, and other stakeholders to establish an NMCA in Nova Scotia. Two candidate sites have been identified, but the identification of potential offshore wind development areas within the proposed NMCA may jeopardize establishment: <ul style="list-style-type: none"> • The proposed Pemsik NMCA is the preferred candidate site and is located adjacent to Kejimikujik National Park Seaside and extends 100 km off the coast. The proposed NMCA will be representative of the Scotian Shelf Marine Region, including basin, bank, and shelf habitat, as well as biophysically diverse coastal estuaries, inlets, and beaches. The Pemsik NMCA is part of a broader Indigenous-led vision that connects several terrestrial and marine conservation initiatives. The LaHave Basin PDA 	Section 6.2.1 notes several designated protected areas that due to protected status or designation were excluded from consideration for OSW development at this time.

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	boundary overlaps with the proposed Pemsik NMCA by approximately 700 km ² (Figure 1). <ul style="list-style-type: none"> An alternate potential NMCA is off the coast of Cape Breton Highlands National Park. The Sydney Bight PDA overlaps with the NMCA boundary by approximately 190 km² (Figure 2). 	
616	Cape Breton Highlands National Park receives over 333,000 visitors in high visitation years and is an economic driver for the local economy and regional tourism industry. Visitors are likely to be engaged in outdoor recreation with attention focused on the landscape and the views. Visitor experience is likely to be affected by changes to visual landscapes: <ul style="list-style-type: none"> This Park is a remote wilderness area with unaltered views of the ocean. Many of the most-visited trails and lookouts are located at higher elevations with ocean views. The value of the seascape and ocean views to visitor sense of place is reflected in the Parks Management Plan as well as in visitor photos posted in social media where a high percentage of the photos include ocean views. The draft report identifies the boundary of the Sydney Bight PDA at 25 km from the coast of Cape Breton Highlands National Park. While design and technological features may mitigate potential visual impacts, it is likely that wind turbines at a distance of 25 km will have an impact on the views. Based on our analysis that considered wind farms with turbines up to 350 m high and given that many viewpoints from the park are from some elevation, we have determined that a setback of 45 km from the coast would be more certain to ensure only negligible impacts occur on the Park's sensitive views. 	Refer to rationale provided for the buffer in section 6.3. Visual impacts of a specific OSW development should be completed at project level as part of the impact assessment process.
617	Page 222 – NRCan requests that the sentence “Information obtained from recent geotechnical program indicates that the depth of sediment may be insufficient for monopiles” should be attributed to NRCan / Geological Survey of Canada – Atlantic (not NS DNRR), with contact information provided for follow-up. In addition, NRCan suggests that more detailed analyses to determine the engineering (foundation) conditions associated with the geology at each site would be required to better understand and characterize the implicated future foundation type with regards to viability and cost.	Modifications have been made to Table 6.3.
618	As activity in the oceans surrounding Nova Scotia increases, it is critical to highlight key risks of contact with and disruption of the Maritime Link submarine cables. These risks include:	Information, re: the Maritime Link, has been added to Table 6.3 in section 6. Risks to submarine cables have been accounted for in 5 Table 5.7.

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	<ul style="list-style-type: none"> • Interactions with high-voltage submarine cables can result in death, injuries, equipment failure and loss, or vessel capsizing. • Vessel operators who damage the submarine cables will face significant liability risks (considering repair costs would be in the tens of millions of dollars). • Cable damage would be a significant reliability event creating implications for the connected provincial utilities, considering the critical role of the Maritime Link in connecting and stabilizing the region’s electricity grid – particularly during the winter months. • Submarine cable repair and restoration is very costly and could take several months or more, presenting a significant disruption to Atlantic Canada’s electricity grid. In such an event, if a cable gets damaged, this could impede government-mandated clean energy objectives and the ability of utilities in the region to meet energy-sharing commitments and legislated renewable energy and emissions targets, resulting in potential fines. 	
619	What happened to the Western/Emerald bank conservation area entry in Table 4.10? No reason given for not including it as a primary constraint.	Refer to modifications made to section 6.
620	<p>As the Committee has acknowledged in the Draft Report, site selection for offshore wind development is an iterative process that often starts by identifying where development is precluded, such as in MPAs, and then is followed by consideration of other physical, ecological, and socio-economic constraints. We strongly support the Committee's precautionary approach that led it to preclude certain areas—including MPAs and other legally protected areas—from PDAs. For example, excluding Oceans Act MPAs in the RA Study Area—the Gully and St. Anns Bank—from areas to be developed for offshore wind makes sense within a purposive and contextual interpretation of the Oceans Act’s MPA provisions and the respective MPA regulations, which already prohibit the disturbance, damaging, destruction, and removal of living organisms or habitat. In our view, while the Oceans Act and its regulations are not explicit about this, offshore wind development is already prohibited in these MPAs because it would disturb or destroy living organisms or habitat in those areas. A precautionary approach warrants further, explicit recognition of that fact in law and policy.</p> <p>We also support the Committee's consideration of secondary constraints—including Significant Benthic Areas, Ecologically and Biologically Significant Areas (“EBSAs”), coral and sponge areas, sea pen areas, important habitat for sensitive species, and marine conservation network sites— as part of its work to refine the analysis and selection of PDAs. As the Committee has indicated, co-</p>	<p>Section 6.2.1 notes several designated protected areas that due to protected status or designation were excluded from consideration for OSW development at this time. The Committee has acknowledged the proposed Pemsik NMCA as overlapping with the LaHave PDA (section 6.6.7) however the LaHave PDA has been identified as a Tier 2 PDA. Section 6.4 notes that Tier 2 PDAs represent areas that show potential for OSW development but have neither been through the same level of engagement nor generated the same level of technical feedback as Tier 1 PDAs and are viewed as requiring additional investigation and engagement before potentially advancing to Tier 1 status. This would include possible future protective designation of proposed areas.</p>

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	<p>existence of these areas with offshore wind development may be possible, but avoidance of certain areas and identification of conditions to facilitate such co-existence would need to be determined at the project design stage. We point to these conclusions as further evidence that all offshore wind projects must undergo an impact assessment or environmental assessment, where such determinations can appropriately be made through balanced, informed, and participatory decision-making. As we noted above, we also support the Committee’s recommendation to establish a 25-kilometre buffer zone from the shore and a 25-kilometre buffer zone around Sable Island. These buffer zones will enhance protection for important areas, like EBSAs, and for important avian, bat, and land-based species. What we do not support is the Committee’s recommended PDAs where they overlap with key established and proposed legally protected and conserved areas in the offshore, particularly the Western/Emerald Banks marine refuge and the proposed Pemsik NMCA, which is part of a large, Indigenous led “conservation mosaic” that has the opportunity to become an Indigenous Protected and Conserved Area.</p>	
621	<p>We do not support the Committee’s conclusions that research undertaken during initial offshore wind projects is the point in time when decisions should be made regarding the future use of marine refuges like the Western/Emerald Banks. Inherent in the DFO’s approach and the Committee’s conclusions is this: not enough is known about the impacts of offshore wind development on the biodiversity conservation benefits and conservation objectives of marine refuges, which is supported by other conclusions and findings of the Committee elsewhere in the Draft Report. A precautionary approach warrants precaution in the face of uncertainty, and there are clearly many unknowns about impacts in the marine refuge. Furthermore, as we have noted above, a tiered approach to planning and assessment requires a regional assessment or strategic environmental assessment that considers the impacts of offshore wind development in an area. In our view, this requirement has not yet been met for the Committee’s recommended Western/Emerald Bank PDA, which until recently was only half the size now proposed by the Committee, and which has not been subject to input from Indigenous rightsholders, stakeholders, coastal communities, and other ocean users.</p> <p>It is also significant that, in the Draft Report, the Committee highlighted multiple reports that did not identify Western/Emerald Banks as an area suitable for (or in low conflict with) offshore wind development, including DFO’s Marine Spatial Planning Atlas, Aegir Insights’ “Value Mapping Nova Scotia’s Offshore Wind Resources” (2023), CanmetENERGY’s “Preliminary Considerations Analysis of Offshore Wind Energy in Atlantic Canada” (2023), and the DFO’s “Marxan with Zones Analysis for Potential Locations of Low-Conflict with</p>	Refer to modifications made to section 6.5.

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	<p>Offshore Wind Development" (2024). Notably, the marine refuge was only identified as an area of low conflict in a submission from the Nova Scotia Fisheries Alliance for Energy Engagement (2024), which makes sense because until the emergence of the nascent offshore wind industry, fisheries activities were the only threat to the benthic area. Finally, the Committee has only identified one potential offshore wind proponent with an interest in the Western/Emerald Banks area.</p> <p>To strengthen the protections for existing and future MPAs and OECMs in the RA Study Area, we point to two new provisions of the amended Accord Acts:</p> <ul style="list-style-type: none"> • Section 135 of the amended federal Accord Act and section 60(1) of the amended provincial Accord Act will allow the responsible Federal Minister and Provincial Minister to issue a joint direction to the CNSOER to prohibit the issuance of submerged land licenses. • Section 137 of the amended federal Accord Act and section 62A of the amended provincial Accord Act will allow the Governor in Council, for the purpose of protection of the environment, to make regulations prohibiting offshore renewable energy projects (including offshore wind developments) in any part of the offshore area that is, or in the opinion of the Governor in Council, may be identified under an Act of Parliament or the provincial legislature as an area for environmental or wildlife conservation or protection. <p>Once in force, these provisions of the amended Accord Acts will enable greater and clearer protection of existing and future MPAs, OECMs, and other legally protected and conserved marine areas.</p> <p>We also recommend that the Committee narrow the proposed Sable Island Bank and Western/Emerald Bank PDAs to the areas that do not overlap with the Western/Emerald Banks marine refuge, and we recommend that the Committee relegate the remaining Western/Emerald Bank PDA area to a "Tier 2" PDA.</p>	
622	<p>As we have mentioned, and as is noted in the Draft Report, Pemsik is an Area of Interest ("AOI") for an NMCA, and the establishment process for the NMCA is underway. This area is identified as an AOI in Figure 4.11, "Existing and Proposed Conservation Sites with Ecological Areas" of the Draft Report. Parks Canada has recommended that offshore wind development be excluded from this proposed NMCA, along with another potential NMCA in the coastal areas off of Cape Breton Highlands National Park.</p> <p>As we have noted above, an MSP for the offshore area that is developed as part of a tiered approach to planning and assessment would identify prospective offshore development</p>	<p>Section 6.2.1 notes several designated protected areas that due to protected status or designation were excluded from consideration for OSW development at this time. The Committee has acknowledged the proposed Pemsik NMCA as overlapping with the LaHave PDA (section 6.6.7) however the LaHave PDA has been identified as a Tier 2 PDA. Section 6.4 notes that Tier 2 PDAs represent areas that show potential for OSW development but have neither been through the same level of engagement nor generated the same level of technical feedback as</p>

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	areas and consider them in light of existing and anticipated legally protected and conserved areas like the proposed Pemsik NMCA and other future potential conservation areas. We therefore recommend that the Committee remove Pemsik from its LaHave Basin PDA.	Tier 1 PDAs and are viewed as requiring additional investigation and engagement before potentially advancing to Tier 1 status. This would include possible future protective designation of proposed areas.
623	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?	As presented in the "Considerations" columns in Tables 6.4, 6.6 and 6.7, a detailed analysis of constraints and potential impacts (including fisheries) will need to be performed within any area of interest for OSW development at project level. Should future OSW development be proposed in areas potentially affecting the fishing industry, the Committee urges active participation in the impact assessment process. Given that the understanding of current baseline conditions within PDAs varies, the intent of enlarging PDAs was to enable potential OSW development to avoid conflicts to the extent possible to as part of a micro siting process.
624	We have 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 ² 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 ² equaling 756,000 Ha of ocean space.	At this stage, specific location and concentration of development is unknown. However, the Committee believes that in the unlikely event that 5GW of power was proposed in one region of the RA Study Area, implementation of recommendations T1-1 and T2-4 within the regional area subject to development would be crucial to understanding existing conditions and potential conflicts and impacts.
625	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.	Acknowledged. Amendments have been made to the text in section 6.1-6.4.

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626	<p>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.</p>	<p>The Committee appreciates the feedback provided regarding the halibut and snow crab fishing activities in French Bank. As discussed at the end of section 6.6, the Committee would like to reiterate that the intent of developing PDAs was to identify broad areas within the RA Study Area that represent technically feasible locations for OSW development, while minimizing potential conflicts and adverse interactions on a large scale. It was not the intent of the Committee to microsite potential fishery data that is subject to change prior to OSW development, especially in the face of climate change. Should future OSW development be proposed in areas potentially affecting the fishing industry, the Committee urges participation in the impact assessment process.</p>
627	<p>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.</p>	<p>Noted.</p>
628	<p>Our suggestions about how to decrease the previous PFDA's have 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</p>	<p>Noted.</p>
629	<p>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 nothing 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</p>	<p>Noted.</p>

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	<p>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.</p>	
630	<p>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 costal 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.</p>	Noted.
631	<p>Was Nova Scotia’s ability to gain a global competitive advantage in the Offshore Wind Sector a criterion for selecting PDA’s? If so, floating wind technology and sector development should have had a greater emphasis. Today, floating technology is not cost-competitive with fixed-bottom, yet it is expected that it will be so by the time offshore wind farms will be constructed in Nova Scotia by the mid-2030s. Fixed-bottom technology has been deployed in other jurisdictions for more than 30 years, and it would be challenging for the Nova Scotia supply chain and innovation eco-system to catch up with strides made globally over the past three decades. However, floating technology is still emerging and not deployed at a large commercial scale anywhere in the world yet. The floating wind sector is an opportunity to gain a global competitive advantage for Nova Scotia given some of its deep-water areas relatively close to shore as well as the potential to further develop its deep-water port facilities. Other jurisdictions like Scotland and Maine have recognized “where the puck is going” so-to-speak with floating wind in the overall OSW Sector. They have made either all or part of their most recent seabed licensing rounds for floating technology only.</p> <p>Nova Scotia must consider a similar approach to fully optimize local, regional and national benefits in relation to the emerging OSW Sector. It is unclear in the RA regarding Nova Scotia ambitions for global competitiveness. Would we not want to ensure that our wind resource – which rivals the best in the world – also be matched with an OSW sector that can do the same?</p>	<p>Nova Scotia’s ability to gain a global competitive advantage in the Offshore Wind Sector was not a criterion for selecting PDAs. The methodology and rationale for identifying PDAs is provided in section 6-6.4. Any decision to focus on floating OSW development would be a policy decision reflected in governments' identification of WEAs.</p>
632	<p>Offshore Wind and Green Hydrogen Integration: Strait of Canso OSW connectivity to the emerging green hydrogen sector in the Strait region is an essential consideration. Sector</p>	<p>The Strait of Canso is located within provincial internal waters and is not included in the RA Study Area.</p>

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	<p>coupling for green hydrogen and OSW will be critical to the creation of a strong sustainable green energy sector and our ability to meet net zero/decarbonization targets for both Nova Scotia and for Canada. We would echo the Strait Area Chamber of Commerce’s concerns that the RA disadvantages the Strait of Canso and the Strait Region in their ability to fully participate in the OSW sector (See: Impact of excluding waters in proximity of the Strait of Canso, December 2024). We are concerned about the exclusion of areas in proximity to the Strait of Canso without sufficient evidence or rationale. We feel it is premature to assume the areas outlined for exclusion would not have pockets of favorable areas and strong justification for development.</p> <p>The Strait Area Chamber of Commerce is not advocating for unrestricted development in coastal waters. However, we support development that has cleared a rigorous, transparent, and comprehensive review process. Although the Regional Assessment Committee has considered some of this in broad scope, we feel that, at this stage, there is not enough information or evidence to justify the exclusion of large parcels of offshore areas. As noted, we would support a rigorous review of individual projects, factoring in proximity to sensitive marine areas, shipping routes, fishing grounds, and so on, to ensure they meet the highest standards of safeguards for the environment and are in the best interest of the region (Impact of excluding waters in proximity of the Strait of Canso, 2024). We find it especially concerning because the opportunity for sector coupling of Green Hydrogen in Point Tupper and future OSW development in proximity to the Strait of Canso isn’t possible in the current draft of the RA. To ensure the RA Committee is aware, the two key proponents for Green Hydrogen production (Everwind Fuels and Bear Head Energy) are both located in Point Tupper on the Strait of Canso with key on-land wind parks located in the Strait and in central Nova Scotia. With the Strait of Canso being the best location for Green Hydrogen production east of Montreal, and the competitive and economic advantages of sector coupling for green hydrogen and OSW, we would ask for more work and consideration be given to the Strait of Canso and how we can support (not disenable) Offshore Wind and Green Hydrogen Integration.</p>	
633	<p>6.3 - 6.8 PDA Suitability Summary Tables. It would be helpful for readers if there was a hyperlink for the ECCC Feedback sections, similar to the DFO Feedback. Recommendation: ECCC recommends including a hyperlink to the PDA Overlap document provided by ECCC that is housed on the registry. ECCC recommends including the link in each PDA table.</p>	<p>Updates provided in section 6 including updated hyperlinks in Tables 6.3-6.10.</p>

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634	<p>Table 6.3. Sydney Bight PDA Suitability Summary Table</p> <p>Recommendation: Update: Ring-billed Gull also forage at disproportionately high densities compared to the rest of the NS Study Area.</p> <p>New overlap (for consideration): Tracking data indicates Northern Gannets may migrate through this area in both Fall and Spring; Great Shearwater high use areas overlap with Sydney Bight in the fall.</p>	Feedback has been added to Table 6.3.
635	<p>Table 6.4. Middle Bank PDA Suitability Summary Table</p> <p>Recommendation: Update: Northern Gannet do not forage at high densities during the summer in Middle Bank. There is high Collision Vulnerability in the Fall, and moderate-high Collision and Displacement vulnerability in the spring, fall, and summer.</p> <p>New overlap (for consideration): Northern Gannet tracks may migrate through Middle Bank at moderate levels in both Spring and Fall. There may be overlap with landbird migratory routes from Sable Island, e.g., Savannah/Ipswich Sparrows, that requires additional follow-up. Opportunity for MOTUS tagging studies.</p>	Feedback has been added to Table 6.4.
636	<p>Table 6.5. French Bank PDA Suitability Summary Table</p> <p>Recommendation: Update: Arctic Terns also forage at disproportionately high densities compared to the rest of the NS Study Area. Additionally, there is moderate-high Displacement Vulnerability for the French Bank PDA in the fall.</p> <p>New overlap (for consideration): Northern Gannets migrate through French Bank in both the Fall and Spring. French Bank overlaps with high use areas of tracked Herring Gulls in spring and summer, and Northern Gannets in fall. There may be overlap with landbird migratory routes from Sable Island, e.g., Savannah/Ipswich Sparrows, that requires additional follow up. Opportunity for MOTUS tagging studies.</p>	Feedback has been added to Table 6.5.
637	<p>Table 6.6. Sable Island Bank PDA Suitability Summary Table</p> <p>Recommendation: Update: None</p>	Feedback has been added to Table 6.6.

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	<p>New overlap (for consideration): Sable Island Bank overlaps with high use areas from tracked Great Shearwater in the Fall</p>	
638	<p>Table 6.7. Western/Emerald Bank PDA Suitability Summary Table</p> <p>Recommendation: Update: There is high displacement vulnerability for the Western/Emerald Bank PDA in the Winter. Moderate to Moderate-high collision and displacement vulnerability occurs across all seasons.</p> <p>New overlap (for consideration): Tracking data indicates Great Shearwaters migrate through Emerald Bank in Fall, and possibly similar trends for Sooty Shearwater. This PDA overlaps with high use areas from tracked Great Shearwater in Fall and Northern Gannet in Winter</p>	<p>Feedback has been added to Table 6.7.</p>
639	<p>Table 6.8. Canso Bank PDA Suitability Summary Table</p> <p>Recommendation: Update: There is moderate-high Collision and Displacement Vulnerability in Spring, Summer, and Fall for the Canso Bank PDA.</p> <p>New overlap (for consideration): There is overlap with high use areas of tracked Northern Gannets in Fall</p>	<p>Feedback has been added to Table 6.8.</p>
640	<p>6.6.7 LaHave Basin</p> <p>Recommended text: “There is a high density of Gulls, including Great Black-backed Gull, and Herring Gull, as well as Northern Gannet in the Summer. There is high density of Common Murres, Dovekies, and Murres in the winter. Herring Gulls forage at disproportionately high densities in the LaHave Basin PDA compared to the rest of the NS Study Area. There is high Collision and Displacement Vulnerability in Summer, and high Displacement Vulnerability in Winter.</p> <p>Tracking data indicates Northern Gannet migrates through this PDA at high proportions in</p>	<p>Feedback has been added to Table 6.9.</p>

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	Fall and Spring, similarly with Great Shearwater in Fall. This corresponds to overlap with high use areas for Northern Gannet in the Fall and Winter.”	
641	<p>6.6.8 Misaine Bank</p> <p>Recommended text: “There is high density of Atlantic Puffin, Black-legged Kittiwake, and Dovekie in the Fall; Black-legged Kittiwake, Common Murre, Gulls, Herring Gull, Murres, Northern Gannet, and Razorbill in the Spring; Black-legged Kittiwake and Murres in the Winter. Northern Gannet forages at disproportionately high densities within the Misaine Bank PDA compared to the rest of the NS Study Area.</p> <p>There is high Displacement vulnerability across all seasons, and high Collision Vulnerability, particularly in Spring and Summer, with moderate-high to high CV in the Winter.</p> <p>There is overlap with high use areas of tracked Great Shearwater in Fall and Northern Gannet in Spring.”</p>	Feedback has been added to Table 6.10.
642	<p>The overlap between the Western and Emerald Banks Marine Refuge and the Western/Emerald Bank PDA should be removed.</p> <p>At minimum, the Western/Emerald Bank PDA should be changed to Tier 2 status to reflect the need for more information to properly assess this area and the potential risks posed by future development. Classifying Emerald Bank PDA as a Tier 2 PDA would align with the definition provided in the report: “Tier 2 PDAs are viewed as requiring additional investigation and/or stakeholder/rightsholder engagement before being elevated to the Tier 1 category or designated as WEAs”.</p>	<p>Modifications have been made to section 6.</p> <p>Whether OSW development is proposed in a Tier 1 or Tier 2 PDA extensive additional work, studies and engagement need to be completed to determine the feasibility of development including a determination of appropriate mitigation where conflict avoidance is not possible.</p>
643	<p>With the exception of Pemsik, DFO acknowledges that there is no other overlap between any PDAs and Tier 1 sites of the Scotian Shelf/Bay of Fundy Marine Conservation Network. DFO encourages avoidance of Pemsik and other Tier 1 sites as site-specific implementation activities are anticipated during the 2025-2030 period. However, Tier 2 sites, which require further study, may be adjusted to account for future offshore wind siting.</p>	<p>Refer to section 6.2.1, that notes that due to protected status or designation the Committee excluded several areas from consideration for OSW development at this time (e.g., MPAs, Critical Habitat, National Park Reserves, Marine Bird Sanctuaries etc.).</p>
644	<p>We recommend that Tier 1 network sites be avoided. We would consider changes to the Tier 2 network sites to minimize overlap with prospective OSW areas, but OSW is not compatible with federal statutory protected areas (e.g., Oceans Act MPAs) and would</p>	<p>Noted. Refer to WEBMR section 6.</p>

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	require application of the federal protection standard for marine other effective area-based conservation measures (OECMs).	
645	The following PDAs overlap with important habitat described for species at risk: <ul style="list-style-type: none"> o Sydney Bight (blue whale, LBST) o Canso Bank (LBST) o Middle Bank (northern bottlenose whale, blue whale) o Sable Island Bank (northern bottlenose whale, blue whale) 	Feedback is included within Tables 6.3, 6.4, 6.6 and 6.8.
646	As well, all PDAs overlap with the known distribution of North Atlantic right whale.	Feedback is included within Tables 6.3-6.10.
647	Sydney Bight is an area of known distribution and migration area of several marine mammals/animals listed on Schedule 1 of the SARA including blue whale (Endangered), North Atlantic right whale (Endangered), fin whale (Special Concern), white shark (Endangered) and leatherback sea turtles (Endangered).	Feedback is included within Table 6.3. Inclusion of the Marine Atlantic ferry has been added as a functional consideration in Table 6.1.
648	Any OSW project proposed in or near future CH would be subject to an assessment to determine if the activity will result in destruction of that CH, and/or if the activity would jeopardize the survival or recovery of the species and if all reasonable alternatives and feasible measures were taken to avoid/mitigate the impact of the activity on the species or its critical habitat.	Feedback is included within Table 6.3 and 6.8.
649	Primary Constraints (page 205): Marine Refuges should be added to the list of primary constraints identified in the report. These are areas that have been established to achieve long-term effective conservation of biodiversity and contribute to the Government of Canada's commitment to protect 30 percent of Canada's land and water by 2030.	Please refer to modifications made to section 6.
650	Secondary Constraints (Table 6.1): The statement that "coexistence is possible" with the conservation network is a bit misleading, as the network includes existing sites, Areas of Interest (AOIs), and tier 1 and tier 2 sites. Coexistence should not be considered with existing sites. This section should be specific in terms of which types of spatial measures may co-exist with offshore wind.	Refer to WEBMR description in section 6.
651	Based on the best available information and advice on sedimentation effects on sensitive benthic species, DFO recommends that a 2km buffer be applied around conservation areas including marine refuges with conservation objectives related to sensitive benthic species. Although this advice was specific to oil and gas activity, the sedimentation from installation of OSW infrastructure would be similar and this should be considered the best available information until specific advice can be produced for OSW development.	For responses related to protected and conservation areas, please refer to modifications made to section 6.

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652	From a Canadian Coast Guard perspective, the proposed 25 km coastal buffer should mean that there will not be any major issues with radar/VHF towers; generally, this is a concern for land-based towers. Nevertheless, given the report had made recommendations for further studies within the Study Area, it may be worth suggesting funding for electromagnetic studies to add to the knowledge base on how/if offshore wind turbines may affect radar/radio communications.	This issue will be assessed during the impact assessment process. This issue should be addressed as part of the T1-1 initiative recommended by the Committee in section 10.
653	St. Ann’s Bank should be corrected to St. Anns Bank throughout the report.	Text corrected.
654	The PDA-specific tables summarize relevant information, although it is unclear if potential impacts on communal Indigenous fisheries have been considered.	The PDA specific tables in section 6.7 are used to present feedback obtained during the engagement process and comments pertaining to the Interim and Draft Final Reports. This has been clarified in the final paragraph of section 6.7. Impacts to all fisheries are discussed in section 5.
655	Table 6.1: In the Marine conservation network row “Coexistence is possible” should be replaced with “Coexistence may be possible” to align with the language that is used for the rest of the secondary constraints.	Modification to Table 6.1 has been made.
656	6.4 and Recommendation T3-1: Each of these parts of the report refer to the establishment of a 25-km coastal buffer that takes into consideration “established marine shipping routes and areas of heavy vessel traffic.” However, it should be noted that in the case of Marine Atlantic Inc.’s ferry routing across the Sydney Bight PDA, the density and patterns along the vessel routing are the same both inside and outside the 25-km buffer. Thus, shipping navigation risks in the PDA would be greater beyond the 25-km buffer due to increased wind exposure, wave heights, and sea ice combined 30 with the potential presence of offshore wind infrastructure. In light of increased shipping risks, international guidance and standards on shipping route avoidance by offshore wind development should be considered in the RA Committee's report. See appendix III for additional resources on this topic from other jurisdictions. As well, the Marine Atlantic Inc. shipping route could be considered as a potential Secondary Constraint to include in Section 6.3 on page 208 of the report.	Feedback is included within Table 6.3. Inclusion of the Marine Atlantic ferry has been added as a functional consideration in Table 6.1.
657	A description in the text should be added related to Figure 6.5 noting that the lack of fishing activity observed in some of the areas on the map are a result of existing conservation areas (MPAs and Marine Refuges). Specifically, it should be noted that the lack of fishing activity seen within the Emerald Bank PDA is a result of WEBMR.	Modification has been made to section 6.7.5 to reflect this comment.
658	The Sydney Bight PDA is described as being designed to minimize conflict with the inshore lobster fishery; however, Cook et al. (2024) indicates that the LFA 27 fishery extends to the	Modifications have been made to Tables 6.3, 6.5, 6.8, 6.9 and 6.10 to reflect these comments.

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	60-m bathy line which overlaps the Sydney Bight PDA. See Figures 4 to 13 here: https://publications.gc.ca/collections/collection_2024/mpo-dfo/Fs97-6-3602-eng.pdf Also note there are 3 active telecom cables in the Sydney Bight PDA. Active telecom cables are also laid in the PDAs for LaHave Basin, French Bank, Canso Bank and Misaine Bank.	
659	The text on the Middle Bank PDA does not highlight the shrimp trawl fishery on the northern and eastern parts of the bank.	Feedback is included within Table 6.4.
660	The text on the French Bank PDA does not reference the overlap with the snow crab trap fishery or the hagfish barrel trap fishery.	Feedback is included within Table 6.5.
661	These areas are annually surveyed by DFO under an agreement with the fishing fleet. They show consistent productivity; however, it is variable and currently low, but with consistent settlement. These areas have a history of significance to the fishery that could become important in the future.	Feedback is included within Table 6.4, 6.6 and 6.7.
662	Sable Island Bank PDA: In the section that speaks to the overlap with WEBMR (para. 3), it should be stated that if OSW development were to occur within the existing Marine Refuge the area would need to be reassessed to determine if the site is still meeting the OEEM assessment criteria, which could result in the site or part of the site no longer contributing to Canada's Marine Conservation Target initiative. As well, suggest reiterating here one of the conservation objectives of WEBMR that is in Table 4.10: "Manage the disturbance of benthic habitat that supports juvenile and adult haddock and other groundfish species." Recommend a different word for "utilization" when referring to Marine Refuges as these areas are set aside to provide long-term biodiversity conservation benefits and not to be utilized for industrial scale activity. Suggest the following: "Given the infancy of the OSW industry in NS, the Committee expects that the findings of research undertaken during any initial OSW projects will support decision-making regarding the future compatibility of Marine Refuge areas."	Modifications have been made to sections 6.7.4 and 6.7.5 to reflect these comments.
663	French Bank: There is a reference to "Vessels under 45 feet are not required to have AIS..." Note that there are no AIS carriage requirements on Canadian fishing vessels due to an exception in s. 103(2)(a) of the Navigation Safety Regs of the Canada Shipping Act, 2001. This bullet likely refers to exemptions applied to VMS (vessel monitoring system) transponders on Canadian fishing vessels < 45 feet.	The Committee adopted the practice of recording feedback as received. The Committee acknowledges the clarification provided by DFO.
664	Table 6.6: The link to the NSFAEE feedback takes you to a submission from the NSDFA, not the NSFAEE.	This has been corrected in Table 6.6.

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665	Table 6.8: Please edit this sentence as follows: "It is hard to estimate the total volume of traffic since vessels under 45 feet are not required to have VMS tracking." As noted, above, Canadian fishing vessels are exempt from AIS carriage requirements in regulations but do use AIS voluntarily.	The Committee adopted the practice of recording feedback as received. The Committee acknowledges the clarification provided by DFO.
666	Table 6.7: Under the "comment" and "considerations" columns in the DFO row, all information related to WEBMR including the description, conservation objectives, and possible implications stated in Table 6.6 should be repeated in Table 6.7, rather than refer the reader to the Sable Island Bank PDA section. Including the comments in the Sable Island Bank table and not here obscures the important ecological considerations that are directly applicable to the Emerald Bank PDA. "Table 6.7" under the DFO considerations column/row should be changed to "Table 6.6." Haddock should be added to this table as part of the fish species present within the PDA.	Suggested modifications have been made within Table 6.7.
667	Note that the LaHave Basin PDA overlaps with groundfish bottom trawling inside the PDA about 35-40 km from shore and at > 100 m depth.	Suggested additions have been made within Table 6.9.
668	Should include in this section that snow crab is targeted on Misaine Bank within the PDA, and the PDA overlaps with the commercial whelk trap fishing area in 4Vs.	Suggested additions have been made within Table 6.10.

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669	Scaling of projects, recommendation – Scaling down will hopefully avoid negative impacts. Need to revisit the multi-year and multi-project to have a small scale to start if people think this is the best solution to climate change. Scaled down projects (3-5 turbines) may be preferred to respect precautionary approach.	The scaling of projects will be determined at the project-development level and the need for attempting to understand and effectively consider the cumulative effects of a new industry has been noted as particularly pertinent. The Committee has discussed in section 7 that "as the scale of OSW development increases, so will the associated risk of significant cumulative effects (Guşatu et al., 2021; Willstead et al., 2018). It is therefore not only an important part of assessing the effects of OSW development, but also a critical factor in planning for OSW. Put simply, it is important to determine what is possible and where responsibility for action resides."

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670	The expected biophysical changes to the components of the environment and the spatial and temporal scale of such changes with cumulative effects and effects on connectivity between ecosystems should be assessed.	The RA Report is meant to be broad and high level. An assessment of connectivity between ecosystems is outside the scope of the RA and without any OSW projects currently in place, cannot be completed at this time.
671	Section 7.4 - The report should clarify what is meant by "minor impacts" by providing specific thresholds or criteria for identifying such impacts. Additionally, it should outline the conditions under which these minor impacts could accumulate and lead to more significant cumulative effects. This would enhance the transparency of the assessment process and support more informed decision-making.	Where relevant, reference to minor impacts has been revised. However, in part of the discussion the reference to "minor" remains part of the context.
672	Section 7.4 - The report should include a more robust framework for assessing the cumulative impacts of multiple projects within the same PDA. This could involve considering spatial overlap, timing of construction and operation phases, and how multiple developments could exacerbate impacts on marine life, fisheries, and ecosystems. There should also be more guidance on how to manage these overlapping impacts in practice.	Refer to section T1-1 for expectations around the SSCRI priorities which would include work towards cumulative effects.
673	Section 7.4 - To enhance the effectiveness of the Cumulative Environmental Effects Assessment, EFN recommends the Committee establish a structured, ongoing process for integrating Indigenous Knowledge throughout the entire project lifecycle. This should include meaningful engagement with Indigenous communities, not just in the planning phase but throughout implementation, monitoring, and decommissioning.	The establishment of any processes beyond the RA is beyond the scope of the Committee's mandate. The report acknowledges Indigenous Knowledge throughout as a key part of the planning process and for project specific impact assessments in the future - please refer to recommendation T5-1 (section 10).
674	Section 7.1.3 (pg. 266) "most impacts, however, appear to be moderate and the benefits, both in terms of socioeconomic effects and in addressing GHG emissions can be substantial" - This sounds like a speculation which is not neutral, especially if most of the power created is to be exported somewhere else. In this case, the GHG emissions limitations will not benefit Nova Scotia. The wording may be changed.	The OSW industry is in the early planning stages at this point - wind energy areas still need to be delineated, and projects proposed. At this stage the use of the power generated has not been determined and will depend on many (future) factors. However, the move over to OSW will benefit Nova Scotians in the reductions of GHG emissions. This is more than just an opinion. Text has not been changed.
675	Section 7.4 (pg. 281) Requirement for a TEKS - Since the proposed activities will be located offshore, our team questioned the feasibility of a Traditional Ecological Knowledge Study (TEKS). Currently, the data available on Mi'kmaw archaeological resources offshore is still very limited, and we are concerned about the credibility of a TEKS in this case, which will probably be based mostly on desktop data gathered in a report. More discussions are required on this matter.	The Committee agrees that discussion around the approach to TEKS/MEKS is required. Recommendation T1-2 notes the involvement of UINR, CMM, KMKNO and APC in this process however; wording has been added to acknowledge that the scope and approach of the studies be part of those planning discussions.

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676	<p>MRC agrees with the principle of Cumulative Effects Assessment (CEA) framework. It would be helpful for OSW industry as well as other affected parties, to understand how other projects are categorized for such an assessment. For example, where past projects are mentioned, it would be assumed that this would be just the infrastructure installed rather than accounting for past activities – further clarification would be beneficial. It would also be helpful to understand how factors such as climate change and other future changes are factored into such an assessment, with a preference for CEAs to focus on other projects that are scoped and are moving forward in the permitting process. In sections 7.2 and 7.4, some of the descriptions in these sections are overlapping with the definition of inter-related effects and in-combination effects rather than cumulative effects. It would be helpful to provide guidance on those separately for assessments.</p>	
677	<p>Project Related Cumulative Assessment (p. 283) Related to the feedback above, MRC recommends that OSW developers are engaged and included in any future discussions pertaining to CEA frameworks. It is challenging to account for environmental or socioeconomic factors within a CEA, which is best focused on how impacts can interact between projects. More clarity around CEA monitoring programs, and the implementation of those, would be very helpful, and developers can assist with that as well. For example, would this be implemented across multiple projects? What would be the best approach to manage data and reporting?</p>	<p>Specific mention of Developers has been added to the recommendation for CEA (see T5-1 in section 10) and in section 7.5. Clarification of CEA monitoring programs (e.g., approaches to data management and reporting) cannot be detailed at this time - preliminary steps are required as suggested by the Committee in section 7 and section 10 (specifically section 10.5).</p>
678	<p>While we appreciate the analysis the Committee has conducted and the tiered reality of a cumulative assessment, we still find it deeply concerning that the Regional Assessment for Nova Scotia does not include a full Cumulative Effects Analysis (CEA). We support the methodology that the Committee undertook to address cumulative effects on a regional scale, however we recommend that further work be done to fully understand the impacts of offshore wind developments to the wider ecosystem.</p>	<p>The Regional Assessment is complete with the submission of the final report in January 2025. A full CEA when there are no OSW projects currently underway, or even proposed, would not serve the development of the industry at this time. As such, the Committee addressed CEA at a regional scale and has proposed a shared and tiered process moving forward (recommendation T5-1)</p>
679	<p>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.</p>	<p>The location of individual projects will take place within wind energy areas which will be determined by regulatory agencies. The Committee does not have any information on how modelling will influence this process.</p>
680	<p>We have serious concerns that this aspect of the cumulative effects assessment has not been properly considered, and that the Committee has not identified or provided a clear framework through which all the cumulative effects will be assessed. As others have submitted, assessing cumulative effects is one</p>	<p>The Committee has provided a recommendation towards initiating a CEA after determining that a detailed CEA could not take place at this time given lack of data about</p>

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	<p>of the primary reasons to undertake a regional assessment, and we refer the Committee to its mandate as set out by its Terms of Reference: it must consider both “potential positive and adverse effects” of offshore wind developments. We recognize the Committee has worked to address cumulative effects in the limited time provided to undertake this assessment, but the state of understanding of cumulative effects is not sufficient to forego a precautionary approach</p>	<p>project effects and the marine environment in general (refer section 9). Justification for this approach is detailed in section 7. It should be noted that the Committee does not recommend forgoing the precautionary approach. The Report in fact recommends, in many sections, that a precautionary approach be taken.</p>
681	<p>We make a point of noting this because, in the Draft Report, the Committee writes: “the literature suggests that [...] project-level CEAs [cumulative effects assessments] tend to be associated with stronger decision-making processes than those undertaken at a regional scale.”</p> <p>While we can certainly appreciate that cumulative effects assessment may benefit from the specificity that one or more defined project proposals can provide (for example, by providing specific figures to input into predictive modelling), nevertheless, we have seen time and again that project proponents and governments struggle to conduct meaningful cumulative effects assessments at the project level when relevant “big-picture” data has not been consolidated by government.</p>	<p>The Committee acknowledges that data is key CEA, but this will need to be collected (see recommendation T1-1 in section 10) and will be used to inform a CEA framework (see section 7).</p>
682	<p>As we interpret it, the Committee’s vision of “tiered and shared responsibilities”—as per the title of this subsection of the Draft Report—is largely aligned with our vision for tiered planning and assessment of offshore wind development. That being said, there are some significant differences between the two visions, namely: the Committee’s vision of tiered and shared responsibilities appears to focus on how different levels of governmental and non-governmental data collection and modelling (i.e., international, federal, provincial, and private) must be layered together to foster a complete-as-possible understanding of cumulative effects of offshore wind development; whereas, by contrast, our vision of tiered planning and assessment focuses on the need for legislated requirements for high-level assessments (such as regional assessments or strategic environmental assessments) and project-specific assessments (such as impact assessments or environmental assessments carried out by others) to conduct cumulative effects assessment, inform site selection, and inform project-specific design and impact mitigation measures, among other things.</p> <p>The most significant difference between the two visions, in our view, is that while the Committee is envisioning a significant amount of top-down work by the federal and provincial governments to gather data, conduct or commission predictive modelling, and develop guidance for project specific cumulative effects assessments by offshore wind proponents, the Committee has not identified specific planning or assessment processes through which this crucial work should be done. We agree entirely with the Committee that these efforts are necessary, and we would argue that regional assessments (including regional assessment follow-up programs) and strategic environmental assessments are appropriate tools for the work the Committee suggests should be</p>	<p>Observations noted and acknowledged.</p>

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	done. In our view, legislated requirements for high-level assessments and project-specific assessments, as described below, would support the realization of the Committee’s vision of tiered and shared responsibilities.	
683	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.	Noted.
684	7.2.2 Federal Approaches to Cumulative Effects Assessment - The contents of this section lean heavily towards project-level cumulative effects assessments (CEAs), which does not align with the regional assessment’s scope. The section would be clearer if it explicitly distinguishes when the information pertains solely to project-level CEAs, regional-level CEAs, or both. For example, the first paragraph and bullet points focus primarily on project-level CEAs, while the following paragraphs discuss regional-scale CEAs. These should be separated to avoid confusion.	Some revisions have been made to Section 7 around CEA. However, it is noted that the Committee has laid out the reasoning for their approach, including the restrictions of the TOR, to CEA (please refer to section 7).
685	7.5.1 Tiered and Shared Responsibilities - The contents do not logically fit under the subsection header. The section includes a discussion of climate change, the importance of improving the understanding of how climate change will impact OSW development through modelling, the need for collaboration	Revisions have been made to Section 7 layout.
686	7.2.2 Federal Approaches to Cumulative Effects Assessment - The contents of this section lean heavily towards project-level cumulative effects assessments (CEAs), which does not align with the regional assessment’s scope. The section would be clearer if it explicitly distinguishes when the information pertains solely to project-level CEAs, regional-level CEAs, or both. For example, the first paragraph and bullet points focus primarily on project-level CEAs, while the following paragraphs discuss regional-scale CEAs. These should be separated to avoid confusion.	Some revisions have been made to Section 7 around CEA. However, it is noted that the Committee has laid out the reasoning for their approach, including the restrictions of the TOR, to CEA (please refer to section 7).
687	This chapter would benefit from the inclusion of additional technical content including the following: <ul style="list-style-type: none"> • Differences between project-level cumulative effects assessments (CEAs) and regional CEAs. • The role of regional CEAs in offshore wind (OSW) industry development. • Guidance on Regional CEAs (e.g., limited federal guidance, examples from other jurisdictions, basic steps and considerations, and links to useful resources). • Importance of regional CEAs in supporting OSW, including mitigation through license area selection. • Challenges associated with regional CEAs. • Cumulative effects on valued components. • Recommendation: ECCC recommends revision to this chapter and suggests reviewing the structure and content of the NL Regional Assessment Draft Final Report chapter on 	Some revisions to content have been made to content in Section 7.

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	Cumulative Effects, as well as ECCC’s associated input, which includes extensive edits and suggested text.	
688	<p>This chapter focusses on project-level CEAs and does not synthesize what has been learned about regional-level CEAs. Additionally, the report inaccurately references Ferguson et al., 2024 (Link), which was provided by ECCC in summer 2024. This report outlines important guidance on regional CEAs, but it is not adequately incorporated or correctly cited.</p> <p>Recommendation: ECCC recommends that the Committee reconsider the content in Ferguson et al., 2024, which provides a detailed and comprehensive framework for conducting species-based regional CEAs. This framework is applicable to various wildlife species, not just aerofauna, and serves as a practical guidance resource. It outlines critical steps for regional CEAs, including setting baselines, scenario development, and the integration of expert knowledge. The first four sections of the report are designed to be accessible and useful for practitioners, managers, and stakeholders, promoting consistent and transparent decision-making. Including or referencing this framework in the chapter would enrich the discussion of regional CEAs and provide a more balanced perspective.</p>	<p>The reference to Ferguson et.al. has been corrected. Some revisions to content have been made in Section 7, however given the breadth of the TOR, the geographic scale of the RA Study Area, data limitations, and the timeframe and resources available to the Committee, this RA was not the place to conduct species-based assessments.</p>
689	<p>We recommend adding a definition or explanation of regional CEAs. This information is essential for providing context and enabling later sections to discuss how regional CEAs can benefit the early phases of OSW planning, including addressing approaches, challenges, and uncertainty.</p> <p>Recommended text: "Regional CEAs are studies conducted in areas of existing projects or anticipated development to inform the planning and management of cumulative effects at a broader scale than individual project-level impact assessments. The results of regional CEAs can identify areas where future activities or natural processes may lead to an accumulation of effects that could be problematic for valued components. These assessments can also inform future project impact assessments by placing them in a regional context. When conducted at the regional scale, CEAs can address many of the limitations of project-level cumulative effects assessments."</p>	<p>Additional text has been expanded to more fully explain CEA and the need to recognize the tiered and shared responsibilities that are of necessity associated with the CEA of OSW.</p>
690	<p>Page 265 states “as indicated in section 1.5, the Committee has undertaken the RA through the lens afforded by specific frameworks: the precautionary principle, Etuaptmumk or Two-Eyed Seeing which incorporates the principle of Netukulimk and highlights the importance of embracing different cultural approaches to environmental decision making, and adaptive management.”</p> <p>Despite "Etuaptmumk or Two-Eyed Seeing " being an operating principle, and the availability of resources that provide guidance on how to conduct an inclusive regional CEA that aligns with this principle, the chapter does not include any specific examples of how they were guided by this principle in their consideration of CE.</p>	<p>The section serves only to reiterate the operating principles that have underpinned the Committee’s approach and deliberations. The RA does attempt to provide examples and stresses the engagement that has taken place with Indigenous interests and articulates the concerns and principles raised. Reference as to how the precautionary principle, Etuaptmumk and Two-Eyed Seeing were considered by the Committee are provided</p>

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	<p>Recommendation: In section 7.1.2 and elsewhere in this chapter, how this operating principle guided the consideration of CE for the valued components in this Regional Assessment could be clarified with examples.</p>	<p>and various chapters throughout the Report. They are also noted in Section 7.1.2.</p>
691	<p>The chapter does not explain how the Etuaptmunk or "Two-Eyed Seeing" principle can be applied to regional and project-level CEAs, despite being a stated operating principle. This is a key gap, particularly in terms of demonstrating its relevance to assessing CE and offering guidance on its implementation. Recognizing that ECCC did not provide this information as part of our initial submission to the committee, we would like to provide it now as an opportunity for you to include best available information.</p> <p>Recommendation: In section 7.1.2 and elsewhere in this chapter—both under sections describing challenges and recommendations to overcome challenges—ECCC suggests an explanation of how future project-level or regional-level CEAs could be guided by the "Etuaptmunk or Two-Eyed Seeing" operating principle. The principle should be integrated throughout the chapter, not just in a stand-alone section, to demonstrate a commitment to its consideration in the CEA process as is demonstrated below in text that outlines some key challenges for regional CEAs but incorporates the Etuaptmunk or "Two-Eyed Seeing" operating principle.</p> <p>Recommended text: Here is suggested text to include “Challenges to Regional Cumulative Effects Analysis Complexity of Cumulative Interactions Across Space, Time, and Knowledge Systems...”</p>	<p>The Committee recognizes the factors raised by ECCC, but believe that these matters, i.e., the complexities of addressing interactions across space, time and knowledge systems, have been both identified and discussed in the RA and do not need to be reiterated in section 7.</p>
692	<p>On page 266 it is stated, “attempting to understand and effectively consider the cumulative effects of a new industry is particularly pertinent. As the scale of OSW development increases, so will the associated risk of significant cumulative effects (Guşatu et al., 2021; Willsteed et al., 2018). It is therefore not only an important part of assessing the effects of OSW development, but also a critical factor in planning for OSW. Put simply, it is important to determine what is possible and where responsibility for action resides, a consideration that is addressed below.”</p> <p>Recommendation: The last sentence could be revised to add more detail to improve reader comprehension. Expanding on the key actions mentioned would provide a clearer explanation of what those responsibilities and possibilities entail, such as site selection, risk evaluation, mitigation measures, and monitoring.</p> <p>Recommended text: “Attempting to understand and effectively consider the cumulative effects of a new industry is</p>	<p>Text has been added to section 7.1.2.</p>

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	<p>particularly pertinent. As the scale of OSW development increases, so will the associated risk of significant cumulative effects (Guşatu et al., 2021; Willsteed et al., 2018). It is therefore not only an important part of assessing the effects of OSW development, but also a critical factor in planning for OSW. Put simply, it is essential to understand what is possible and where responsibility for action resides. This includes:</p> <p>Site selection: Identifying appropriate locations for OSW farms that minimize potential environmental and social impacts.</p> <p>Risk evaluation: Assessing the potential cumulative effects from OSW activities in combination with other human and natural pressures.</p> <p>Mitigation measures: Developing and implementing strategies to reduce or offset any adverse impacts identified in the assessment process.</p> <p>Environmental monitoring: Continuously monitoring the effects of OSW development to assess actual impacts on ecosystems and wildlife.</p> <p>Regulatory guidelines: Establishing clear policies and regulations for OSW development to ensure that projects are managed effectively and sustainably.</p> <p>These actions ensure that all stakeholders, including developers, regulators, and the broader community, understand their roles in minimizing cumulative effects and fostering responsible development.”</p>	
693	<p>Page 266 states “attempting to understand and effectively consider the cumulative effects of a new industry is particularly pertinent. As the scale of OSW development increases, so will the associated risk of significant cumulative effects (Guşatu et al., 2021; Willsteed et al., 2018). It is therefore not only an important part of assessing the effects of OSW development, but also a critical factor in planning for OSW.”</p> <p>This small paragraph about the importance of effectively considering CEA of a new industry is important and deserves to be expanded into its own section, rather than being placed in between a description of the three operating principles.</p> <p>Recommendation: ECCC recommends adding a dedicated section or subsection to explain the value of regional-scale CEAs in supporting the development of a new OSW industry. This section can draw from Ferguson et al., 2024, to strengthen the discussion.</p> <p>Recommended text: “Importance of Regional Cumulative Effects Assessments in Offshore Wind Development Attempting to understand and effectively consider the cumulative effects of a new industry is particularly pertinent. As the scale of OSW development increases, so will the associated risk of</p>	Noted. Changes made to section 7.1.2 as referenced in comment #692 including reference as per Ferguson et. al.

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	<p>significant cumulative effects (Guşatu et al., 2021; Willstedt et al., 2018). It is therefore not only an important part of assessing the effects of OSW development, but also a critical factor in planning for OSW (Ferguson et al., 2024). Put simply, it is important to determine what is possible and where responsibility for action resides, a consideration that is addressed below. This includes determining suitable locations for OSW farms to minimize environmental and social impacts, evaluating risks associated with different development scenarios, identifying and implementing measures to reduce or offset adverse cumulative effects, conducting ongoing environmental monitoring to assess actual impacts, establishing clear guidelines and policies for OSW development and monitoring, and defining the responsibilities of developers, regulators, and stakeholders. Without assessing the cumulative effects of offshore wind projects alongside existing human activities and natural processes, there is a risk of overlooking potential adverse outcomes on marine habitats and wildlife. This lack of foresight could result in complications during the development phase, necessitating further assessments and modifications to projects that could have been proactively addressed. Conversely, implementing a comprehensive CEA at the regional scale can enhance decision-making by providing a clearer understanding of how offshore wind projects interact with existing ecological and socioeconomic conditions, including onshore wind projects. By identifying potential cumulative impacts early on, stakeholders can better inform site selection within the recommended licensing areas, ensuring that developments are strategically planned to minimize cumulative effects on valued components through avoidance. Furthermore, a thorough assessment can promote collaborative approaches among various stakeholders, facilitating informed discussions about resource management and enabling the development of more effective mitigation strategies.”</p>	
694	<p>While reiterating that the principles may be useful, the subsection 7.1.2 Operating Principles does not explain how they relate to identifying, understanding, assessing, mitigating, managing, or compensating for cumulative effects on environmental, social, or economic valued components. Recommendation: ECCC recommends revising the section to focus more on practical applications and concrete examples and reduce the background context provided elsewhere. Recommended addition: Consider framing the identification of Submerged Land Licenses (SLLs) as an adaptive process, where area delineation for successive bids is revised based on the best available information on cumulative effects for valued components.</p>	<p>Noted. No further changes have been made to section 7.1.2 other than those referenced in #692.</p>
695	<p>On page 267, the last paragraph states, “it is suggested that given the scope of the TOR and the approach adopted, the latter, including accessing several significant regional data bases and modelling exercises (see section 2), identifying PDAs and making a recommendation on the establishment of a coastal buffer to mitigate impacts to VCs, this RA is responsive to the principles of CEA analysis and the Committee’s mandate.” The current section/chapter does not adequately frame the importance of conducting a regional</p>	<p>Noted. Edits have been incorporated into sections 7.4.1 and 7.4.2 and recognition given to the discretion that exists under the new Accord Acts that allows the CNSOER to undertake additional work, at their discretion, such as (but not limited to) Strategic Environmental Assessments; identify baseline environmental and socio-economic</p>

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	<p>cumulative effects assessment (CEA) to support the development of a new industry (or the risks of not completing one), especially considering that "the Committee has had neither the time nor the resources to develop a sophisticated approach to the challenge posed by the TOR with respect to cumulative effects." This chapter could be strengthened by addressing these issues more directly. Recommendation: ECCC recommends adding text to emphasize the importance of conducting a regional CEA and the risks of not completing one.</p> <p>Recommended text: "Importance of Regional Cumulative Effects Assessments to support the emerging Offshore Wind Industry Without assessing the cumulative effects of offshore wind projects alongside existing human activities and natural processes, there is a risk of overlooking potential adverse outcomes on marine habitats and wildlife. This limitation could result in complications during the development phase, necessitating further assessments and modifications to projects that could have been proactively addressed. Conversely, implementing a comprehensive CEA at the regional scale can enhance decision-making by providing a clearer understanding of how offshore wind projects interact with existing ecological and socioeconomic conditions, including onshore wind projects. By identifying potential cumulative impacts early on, stakeholders can better inform site selection within the recommended licensing areas, ensuring that developments are strategically planned to minimize cumulative effects on valued components through avoidance. Furthermore, a thorough assessment can promote collaborative approaches among various stakeholders, facilitating informed discussions about resource management and enabling the development of more effective mitigation strategies."</p>	<p>conditions with reference to IAAC guidance documents; develop Best Practice Guidelines; and determine spatial and temporal boundaries.</p>
696	<p>On page 271, the last paragraph states, "several federal government departments have established approaches to cumulative effects assessment to address responsibilities pursuant to specific legislative requirements. The Fisheries Act, for example, sets the parameters as to how DFO approaches cumulative effects assessment and ensures that their work is aligned with specific departmental priorities. Section 34.1(1)(d) of the act states that there is a requirement to consider cumulative effects of a proposed project, in combination with past or ongoing projects, prior to making a decision under the fish and habitat protection provisions of the Act (prior to a Fisheries Act authorization decision)."</p> <p>The opening sentence creates an expectation of multiple government department initiatives related to project-level CEAs, but only one (DFO) is addressed. The subsequent paragraphs ("DFO, is however," "ECCC have developed," and "Transport Canada") focus on regional-scale approaches to CE assessment, which would be better grouped under a separate heading. Additionally, the omission of federal guidance for project-level CEAs is a notable gap.</p> <p>Recommendation: Revise the paragraph to focus solely on project-level CEAs and include a reference</p>	Noted.

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	to the federal guidance document on project-level CEAs to enhance its utility (Link). Separate the regional-scale approaches to CE assessment into a distinct section, ensuring alignment and clarity in content organization. This approach will improve the readability and relevance of the section for its intended purpose.	
697	<p>The CEAs procedural steps outlined in page 271 lack clarity regarding their intended scope—regional CEAs or project-level CEAs. The inclusion of "Identification of residual effects" suggests a focus on project-level CEAs, which seems inconsistent with the regional scope of the Regional Assessment. Furthermore, the list provided is not specific to OSW and is incomplete, reducing its utility—particularly since Section 7.5.2 already covers project-level cumulative assessments.</p> <p>Recommendation: Rather than presenting an incomplete list, we recommend referring readers to the federal guidance document for project-level CEAs and progressing to the subsequent sections. If removing this section is not preferred, we suggest revising it to include missing foundational steps that are universally applicable to CEAs (species-based, sector-based, or stressor-based), such as:</p> <ul style="list-style-type: none"> • Explicitly defining the objectives of the CEA (Stelzenmüller et al., 2018; Willsteed et al., 2018). • Defining a set of scenarios with reasonably foreseeable changes in OSW pressures, other anthropogenic pressures, or natural processes, informed by input from diverse stakeholders (e.g., energy and environmental regulators, developers, scientists, Indigenous peoples, and stakeholders; Duinker and Greig, 2007; 2021). • Additionally, ECCC recommends the Committee review prior ECCC input, including the steps outlined in Ferguson et al., 2024 (Section 3.4, Basic Steps for a Species-based CEA). The operating principles proposed by the Committee could also be directly integrated into this list to enhance its comprehensiveness and alignment with broader CEA objectives. 	Noted.
698	<p>On page 272, the second paragraph states, "ECCC have developed an approach for assessing the cumulative effects of OSW development and other pressures on aerofauna within the RA Study Area. This framework presents a cohesive and flexible tool for assessing cumulative effects from OSW development, other human activities and natural processes that are specific to areofauna VCs. Again, this tool will be of immense relevance to developers both in the design of their turbine layouts and in executing project assessments. However, models are most valuable when the data upon which they rely are reliable and up to date. As discussed in section 4, much of the aerofauna data are based upon little more than seasonal surveys and observations in some limited areas where and when vessels with observers are available. This weakness should become less as modern tracking technology becomes more widely used and well-coordinated with other ocean data (see section 10)."</p> <p>This paragraph inaccurately represents the approach ECCC developed and inaccurately represents the quality of aerofauna data.</p>	Noted. The ECCC text in section 7.2.2 has been edited to reflect some of the text in this comment.

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	<p>Recommendation: The Committee's efforts to address a complex and multifaceted mandate within a constrained timeline are commendable. However, certain aspects of ECCC's responses to the Committee's request for science advice may not have been fully incorporated. We encourage careful review of our comments to ensure alignment and to strengthen the outcomes of the Regional Assessment.</p> <p>Recommended text: "ECCC has developed a cohesive and flexible framework for assessing the CE from OSW activities, other human activities, and natural processes on wildlife. This framework synthesizes the best available knowledge on approaches to assessing the cumulative impacts of OSW energy on aerofauna from the USA and Europe. The first four sections of the framework serve as a practical guidance resource, laying out the fundamental steps of a regional CEA in a clear and accessible way. These steps address many critical considerations, such as setting baselines, scenario development, uncertainty and the integration of expert knowledge.</p> <p>The framework is designed primarily to support decision-making during the initial OSW planning phases (e.g., informing selection of licence areas). However, the results of the regional CEAs conducted using this framework at the scale of PDAs can support developers both in the design of their turbine layouts and in executing project assessments. The framework uses a species-based approach, applicable to various aerofauna and other wildlife, and adapts to available information on ecology, socioeconomics, and pressures. This flexibility ensures that the framework accommodates a wide variety of data types and levels of detail.</p> <p>The analytical strategy employs a CE metric to indicate the presence or magnitude of effects from all pressures on receptors. Spatially explicit optimization methods are used to identify OSW site configurations that minimize a CE metric. The framework also accommodates alternative pressure scenarios that include foreseeable future human activities and natural processes, enabling exploration of sensitivity to uncertain parameters."</p>	
699	<p>On page 281, the first paragraph states, "PDAs have been identified to minimize conflict with other marine users and valued ecological areas, significant cumulative environmental effects are not predicted."</p> <p>There are two major issues with this sentence. First, "significant cumulative environmental effects are not predicted" is an unsubstantiated statement given "the Committee has had neither the time nor the resources to develop a sophisticated approach to the challenge posed by the TOR with respect to cumulative effects (page 267)." The claim that significance is not expected is premature and presupposes the outcomes of any regional or project level assessment. Second, the identification of PDAs within the RA Study Area was directly informed by several studies conducted in recent years (detailed in section 2.2). Among these studies, only one incorporated aerofauna data (Nagel et al., 2024) meaning the influence of aerofauna considerations on PDA locations was limited. In addition,</p>	Noted. The text in the first paragraph of 7.2.2 has been edited to reflect some portions of the recommendation.

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	<p>the study that included aerofauna data highlighted several limitations. ECCC’s prior comments about the studies referenced, and the limitations of those studies (comment 4) could be integrated here to temper this statement.</p> <p>Recommendation: ECCC recommends revising the text to remove the unsupported statement. Recommended text: “PDAs have been identified to minimize conflict with other marine users and most valued ecological areas. In doing so, the Committee has aimed to avoid significant cumulative environmental effects from OSW on most valued components (not including Aerofauna, see Section 2.3 Identified Data Gaps and Limitations). However, without conducting a regional CEA assessment, there will be challenges and limitations to predict whether the cumulative effects of future OSW developments on valued components are likely to be significant.”</p>	
700	<p>On page 281, the first paragraph states, “the RA Study Area is large, i.e., 300,000 km², but the identified PDAs cover an area of 31,200 km².”</p> <p>This sentence is structured to infer that the area of the PDAs is small, but 10% of an offshore area is considerable.</p> <p>Recommendation: The revised text should reflect both proportional and absolute context for better clarity.</p> <p>Recommended text: "The RA Study Area encompasses a vast offshore region of approximately 300,000 km². The identified Priority Development Areas (PDAs) span a significant 31,200 km², representing 10% of the RA Study Area."</p>	An edit has been made.
701	<p>The subheader for this section (page 281), as “Cumulative Environmental Effects” does not match the content, as the focus appears on the effects of OSW developments on fisheries and describes socioeconomic consequences.</p> <p>Recommendation: To enhance clarity and alignment with the content:</p> <p>(1) Revise the header to reflect the primary focus of the section on the effects of OSW development on fisheries and socioeconomic consequences.</p> <p>(2) Add subheadings for each valued component listed in Section 5.6 to improve organization and ensure that all components are adequately addressed. For example:</p> <ul style="list-style-type: none"> • Fisheries and Socioeconomic Consequences • Aerofauna • Marine Mammals <p>Benthic Habitat</p>	Noted. Some portions of the text of section 7.2.2 have been edited/augmented, but no new sections have been added. Please refer to other sections of the report (e.g., section 4 and section 5).
702	<p>The cumulative effects of a mature OSW industry within the RA Study Area on Aerofauna within this chapter is incomplete and inadequately detailed.</p> <p>Recommendation: Suggest adding a section with "Overview of Cumulative Effects for Valued</p>	Noted. Edits have been incorporated into section 7.4 to more fully recognize the stresses experienced by aerofauna.

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	Components”, and subsections for each valued component, including Aerofauna. For Aerofauna, highlight the following recommended text. Recommended text: “Overview of Cumulative Effects for Valued Components...”	
703	<p>On page 281, the second paragraph states, “that there will be physical, ecological and socio-economic consequences from the development of a single turbine, or of numerous turbines in a wind farm, is not in dispute. If such development occurs in accordance with all regulatory requirements and best practices, the impacts are likely to be mitigable and minimal.” Given that the Committee’s approach to identifying PDAs relies on studies that do not incorporate significant aerofauna data (or migration connectivity data), and that mitigation measures have not been proven effective, it is unsubstantiated to claim that cumulative “impacts are likely to be mitigable and minimal.” Please note that the conclusion regarding the lack of field-testing for the effectiveness of mitigation measures—and the lack of effectiveness for most measures where testing has occurred—was reported in Gulka et al., 2024. This report resulted from an extensive review of the scientific and gray literature conducted in response to the Committee’s request for science advice. The report concludes that “Avoidance of cumulative effects through siting developments away from high-risk areas for aerofauna was found to be the most effective approach.” This review was shared with the Committee and is now published online as a preprint while the manuscript undergoes peer review. Recommendation: ECCC recommends that the committee revise the Cumulative Effects section to remove any statements suggesting that project-level assessments and mitigation measures alone are adequate to address cumulative effects. In light of the evidence presented in Gulka et al., 2024, it is critical to acknowledge that mitigation measures have not been proven effective through field-testing. Additionally, the Committee should emphasize that the most effective approach to mitigating cumulative effects is avoiding high-risk areas for aerofauna, especially in the context of offshore wind energy development. Furthermore, the limitations of the constraints analysis used to define the PDAs must be clearly acknowledged in the report. The Committee should avoid understating these limitations and ensure that any uncertainties regarding aerofauna data and migration connectivity are transparently addressed in all relevant sections (e.g., 2.2.4, 2.3, 5, 7, 9.1.4, 10.1). Acknowledging these limitations will provide a more accurate and robust foundation for future decision-making.</p>	
704	<p>On page 281, the second paragraph contains a small but important error. The presence of two or more OSW projects may have cumulative impacts on valued components even if they are not within a single PDA.</p> <p>Recommendation: ECCC recommends the following revision. “The scale of a single project, or the presence of two or more OSW projects in a single PDA might</p>	<p>The Committee does not agree. Two or more OSW projects in a single PDA might trigger more concern for a cumulative impact.</p>

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	trigger more concern for a cumulative impact and the need for more rigorous consideration of the physical, ecological and socio-economic cumulative consequences.” (page 281).	
705	<p>Page 281 states, “spatially, for example, such circumstances could include, in addition to the greater displacement of commercial fishing activities, greater:</p> <ul style="list-style-type: none"> • sensory disturbance to fish, marine mammals, sea turtles, birds and bats; • the displacement, disturbance, or loss of habitat for marine mammals and sea turtles; • the displacement, disturbance or loss of foraging area for birds and bats; • cumulative disturbance to sediments/sea states; and • cumulative disturbance to benthic regimes.” <p>The description of the potential cumulative impacts from multiple OSW developments on aerofauna (birds, bats, and Species at Risk) is inaccurate and incomplete.</p> <p>Recommendation: As mentioned elsewhere, this chapter could be significantly improved by adding subsections for each Valued Component, including Aerofauna. If that suggestion is not accepted, at minimum, revise the bullet on birds and bats to address the gaps. This would provide a more accurate and comprehensive overview of potential cumulative impacts on aerofauna.</p> <p>Recommended text:</p> <ul style="list-style-type: none"> • “Both direct impacts, such as collision mortality, and indirect impacts, such as displacement from, or loss of, preferred foraging habitats, migratory pathways, and disturbance.” 	<p>No further details on individual VECs have been added at this scale. A new bullet has been added to the text and an edit made to a second bullet.</p>
706	<p>Page 282, the second paragraph states, “given the geographic and temporal scale of such changes, there must be reliance on the predictive modelling and research efforts of international agencies such as NOAA and the IPCC to inform consequences for the RA Study Area and the implications for OSW development. NRCan, DFO, ECCC, TC and other federal and provincial departments will continue to frame and execute research and modelling to meet their respective mandates and to address the federal and provincial objectives with respect to attaining net zero. This work must become better coordinated and must more fully engage with academia and the users of the waters in the RA Study Area including fishers and Indigenous interests.” The focus of paragraphs within this section are unclear and include both a need for predictive modelling to assess and manage the Cumulative Effects of Climate Change on OSW Development, and the need for predictive modelling to assess Cumulative Effects of OSW on Valued Components.</p> <p>Recommendation: ECCC recommends ensuring that each paragraph (or subsection) makes a complete and distinct point to avoid confusion.</p>	<p>The Committee does not agree that the paragraphs as written are unclear, but edits have been incorporated to emphasize the need for a tiered approach to CEA.</p>
707	<p>On page 282, the last paragraph states, “preparing an effective CEA framework ahead of PDA development will help to ensure that all stakeholders including Indigenous peoples, fishers and local</p>	<p>Noted. Have edited first paragraph of section 7.2 to take account of some of the points raised.</p>

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	<p>municipalities know what the consequences of OSW development may be and are informed as to how those consequences will be addressed.”</p> <p>To support this goal, it would be helpful if the Committee revised this Chapter to summarize the available guidance or at least pointed readers to the guidance that is available. This could go in this section, or in 7.2.2 Approaches to CEA.</p> <p>ECCC did prepare and provide the Committee with a report that was a synthesis of best practices, informed by a comprehensive review of CEA approaches in regions with advanced offshore wind industries (ECCC, 2024b; Ferguson et al., 2024). The report distills the complex process of conducting a CEA into a coherent, detailed, and comprehensive framework. It not only synthesizes the fundamental steps but also provides a practical roadmap that can be understood by practitioners, managers, and stakeholders, making it accessible and applicable across diverse contexts and regions.</p> <p>Recommended text: “Guidance on regional Cumulative Effects Assessments...”</p>	
708	<p>On page 282, the last paragraph states, “the Committee has, based on the work undertaken and within the limitations of the available data, identified PDAs that appear to avoid many potential marine conflicts.”</p> <p>Recommendation: The PDAs avoid many conflicts but given the limitations we suggested to be added to section 2.3 Identified Data Gaps and Limitations, we suggest clarification be provided to cite the exceptions.</p> <p>Recommended edits: "The Committee has, based on the work undertaken and within the limitations of the available data, identified PDAs that appear to avoid many potential marine conflicts for most valued components (not including Aero fauna)."</p>	Noted. Minor edit made.
709	<p>Page 282 states “preparing an effective CEA framework ahead of PDA development will help to ensure that all stakeholders including Indigenous peoples, fishers and local municipalities know what the consequences of OSW development may be and are informed as to how those consequences will be addressed. The preparation of this RA is one of many required steps. The Committee has, based on the work undertaken and within the limitations of the available data, identified PDAs that appear to avoid many potential marine conflicts. Project proponents are required by the IAAC to include a discussion in their environmental assessment a section that addresses cumulative effects.” The text may create an expectation that the Committee may recommend an additional intermediate step to support the OSW industry: a regional CEA. However, the paragraph instead describes a need to develop an effective CEA framework, points to the RA as a first step, and then jumps to project-level CEAs. ECCC previously provided relevant technical advice, including Ferguson et al. (2024), which distills the CEA process into a clear and comprehensive framework, with the first four chapters being particularly relevant. Recommendation: ECCC recommends including additional text to clarify the potential for</p>	Comment has been considered and the paragraph edited.

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	intermediate steps, such as a regional CEA for valued components, as outlined in the NL RA Draft Final Report.	
710	<p>This section is currently focused on project-level CEAs and does not propose how the unmet aspects of the TOR (regarding cumulative effects) may be addressed. The statement that "the Committee has had neither the time nor the resources to develop a sophisticated approach to the challenge posed by the TOR with respect to cumulative effects" (page 267) highlights a gap. This chapter could emphasize the importance of conducting a regional CEA or outline the risks of not completing one. Linking back to other sections in the chapter that provide guidance (or reference to guidance) could also strengthen this section.</p> <p>Recommendation: ECCC recommends adding the below recommended text to highlight the importance of a regional CEA and the associated risks of omission. Please consider the following suggested text.</p> <p>Recommended text: "Importance of Regional Cumulative Effects Assessments to support the emerging Offshore Wind Industry Without assessing the cumulative effects of offshore wind projects alongside existing human activities and natural processes, there is a risk of overlooking potential adverse outcomes on marine habitats and wildlife. This lack of foresight could result in complications during the development phase, necessitating further assessments and modifications to projects that could have been proactively addressed. Conversely, implementing a comprehensive CEA at the regional scale can enhance decision-making by providing a clearer understanding of how offshore wind projects interact with existing ecological and socioeconomic conditions, including onshore wind projects. By identifying potential cumulative impacts early on, stakeholders can better inform site selection within the recommended licensing areas, ensuring that developments are strategically planned to minimize cumulative effects on valued components through avoidance. Furthermore, a thorough assessment can promote collaborative approaches among various stakeholders, facilitating informed discussions about resource management and enabling the development of more effective mitigation strategies."</p>	Noted.
711	<p>Section 7.5.2 (page 283) provides a summary of primary responsibilities of an OSW developer in project related CEAs. Providing a comprehensive resource to guide developers in conducting project-level CEAs is beyond the terms of reference, and this section could be removed. If retained, it would be helpful for this section to prominently mention the availability of federal guidance on project-level CEAs (Link), and to ensure that all sections address all aspects that are included in that guidance (as well as those other the Committee feels important).</p> <p>Recommendation: Please consider either:</p>	The RA is broad in scope so only a primary list of responsibilities was provided. The section was not removed because it is meant to highlight the need and potential responsibilities of developers however further details will need to be provided under specific guidance.

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	(1) Removing the Section: If providing such guidance exceeds the scope of the Committee's mandate. (2) Revising the Section: If retained, prominently mention the availability of federal guidance on project-level CEAs. Ensure the section addresses all aspects included in the federal guidance, along with any additional elements the Committee considers important.	
712	On Page 317, the draft report recommends to “develop a Scotian Shelf Collaborative Research Initiative (SSCRI)”. Recommendation: We have some suggestions the Committee can consider. <ul style="list-style-type: none"> • More than 5 years may be required to establish the SSCRI, support research, and have that research inform the regulatory approval process to guide and support OSW development. • Any regional CEA work that considers valued components that move across provincial boundaries (fish, mammals, turtles, aerofauna) may want to consider beyond the Scotian Shelf. 	Noted. Please refer to T1-1
713	Effects on oceanographic and fishery monitoring programs should be considered in Table 7.1.	Reference to these has been added.
714	Federal Approaches to CEA (page 271): Consider using the term “mitigation” in place of minimization under the procedural step “Identification of mitigation measures” to maintain consistency of terminology used throughout the document.	Text has been revised.
715	IPFs (page 274): Suggest that the bullet “DFO’s ongoing evaluation of the conservation objectives of the Marine Refuge within the Emerald Bank and Sable Bank PDAs” be reworded to “DFO’s ongoing evaluation of the conservation objectives of the Western Emerald Bank Marine Refuge, now encompassed by the Sable Island Bank and Emerald Bank PDAs.”	Text has been revised.

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Section 8. Socio-Economics		
716	Concerned that high cost of wind turbine development will increase NS power bill and cost of living that is already high	This is outside the scope of the RA.
717	Need to consider hiring and developing locally	Additional text has been added to section 5.7.1.
718	Can we get more information on how the pre-commitment phase is going to happen? What is the timeline of this compared to bidding? Can we have a succinct version of what needs to take place within the pre-commitment phase and how this fits into the greater picture of assessments and bidding?	Information on bidding is outside the scope of the RA. It is expected that information related to bidding will be provided through the CNSOER.
719	Might be worth Transport Canada undertaking a port capacity study in NS, as they have done for Bay of Fundy and Placentia Bay in NL.	There is a pending study underway by NZA (Assessment of Atlantic Canadian Ports to Support Offshore Wind).

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		Furthermore, under T2-1 the Committee recommends that an Atlantic Canada OSW Port Coordination Group modelled on the Irish example be established, including representatives from the Independent Marine Ports of Atlantic Canada, the OSW industry, Invest Nova Scotia and the Canada Infrastructure Bank's Advisory Service. Details are provided in section 10.
720	There is benchmark provided on CapEx in Table 8.4, we highlight the gap between floating and fixed. We haven't seen the supply chain cost out for the floating offshore infrastructure – 2-3X more expensive than fixed.	Section 8 has been updated and points have been clarified.
721	Considerations: <ul style="list-style-type: none"> • Delays in US offshore wind development may enhance NS grid export opportunity and offer potential to accelerate deployment timeframe. • While Tier 1 manufacturing certainly has significant potential benefits, we don't see it as 'critical' to success or economic benefit with the OSW sector. There are substantial barriers to entry in this sector, including substantial investment requirements in bespoke facilities/tooling, expertise/experience, certification requirements and brand recognition. Attracting proven European OEMs is likely the most direct path to success. • Many socio-economic impacts may be mitigated/softened through regional approach to OSW development. 	Noted.
722	It is essential to recognize that these rights are integral to Mi'kmaq culture, economy, and community well-being. Therefore, offshore wind development projects must ensure that potential impacts to these rights are fully assessed. This includes understanding and respecting traditional fishing practices, marine resource harvesting, and the broader socio-economic activities that these rights support. This is of particular concern to us given that the legislative scheme not only neglects to include consultation with Indigenous peoples at necessary decision points, it also operates in such a way as to present hurdles to the Crown being able to fulfil its duty to consult.	Noted. The Committee acknowledges the importance of Mi'kmaq culture, economy, and community well-being and the need to involve the Mi'kmaq in the decision-making process as the OSW industry develops. Input during the RA from Indigenous peoples has been recorded and is summarized in the What We Heard section of the report (section 2.1.3). Detailed information and feedback collected during the RA is posted on the Registry in two "What We Heard Summaries".
723	A more detailed and specific Labour Market Analysis would benefit the industry, the public, and the Mi'kmaq of Nova Scotia. This work should include an element that focuses on the availability, readiness, and needs of Mi'kmaw people to be full participant in all aspects of OSW economic opportunity (e.g., from labour to trades to professional positions).	Acknowledged. Committee has noted the need for a more detailed and specific Labour Market Analysis, which includes full participation of Mi'kmaw communities.
724	Summary of Opportunities for Mi'kmaw Communities in OSW Development including subsections on Corporate Training on Mi'kmaw Knowledge Systems and Histories, Mi'kmaw Ownership and	The Committee has heard and considered potential Mi'kmaw opportunities and have noted this throughout the

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	Governance, Adoption of Nation-Specific Mi'kmaw Consent Protocols, Respect Mi'kmaw Ecological and Traditional Knowledge, and Mi'kmaw Training and Employment.	report. Specific approaches as to what kinds of training will be required will be addressed as the planning for OSW progresses and through project specific engagement and consultation processes.
725	Section 8.0 - EFN recommends the final draft report have a more structured approach to manage or mitigate these uncertainties. This could include providing clearer guidance on how Indigenous peoples and stakeholders (including government, industry, and communities) can respond to these uncertainties.	Specific details will be addressed as the planning for OSW progresses and through project specific impact assessments.
726	General comment #3: Does Nova Scotia plan on keeping the power produced within the province or is it intended to be exported to foreign countries and used for green fuel production? If the power is exported, the benefit of reducing Nova Scotia's use of nonrenewable energy will be limited. Mi'kmaw First Nations would like to see the potential development of offshore wind benefit Mi'kma'ki, which has never been the case with land and tidal turbines previously implemented in the Province.	The specifics of potential export of energy derived from OSW projects will need to be determined as the industry progresses and hinges on multiple considerations including amount of power produced, grid capacity, other industry use of OSW energy etc. This cannot be detailed at this time and is therefore not within the scope of the RA.
727	General comment #4: There is not a lot of detail on the maintenance costs associated with the operation of Offshore Wind farms. More details are required.	Details related to the maintenance phase of OSW are project specific and not within the scope of the RA.
728	General comment #5: The report does not provide many details regarding the increased vessel traffic during the construction and maintenance phases. A map with projected vessel traffic during those times would be necessary to address potential overlap with shipping and fishing vessels.	Details related to vessel traffic are project specific and not within the scope of the RA.
729	General comment #8: First Nations should be involved in the management and research related to offshore wind development. The report introduces some solutions to involve First Nations in the process but mostly in the role of informing the research and consequent decision-making process. We have to move from this and involve First Nations earlier to ensure they are part of the research and decision-making process.	The Committee agrees that First Nations need to be involved in the early development stages. Please see recommendations T1-1, T1-5, T2-4 and T6-2. These are all applicable to early and on-going involvement of First Nations in various areas of early development and planning of the OSW industry.
730	Section 8.6.1 (pg. 297) "generational opportunity that is likely unparalleled with anything else on the provincial horizon" - The wording may be changed there to ensure the report remains neutral. These words sound biased and advocate for the development of offshore wind in NS.	Noted. Text has been added to note that this is the province's perspective and was quoted based on the assumption of a 5GW development target.
731	Section 8.6.4 (pg. 301) Net Zero Atlantic - This organization is cited multiple times. What exactly is their mandate and role? Are they advocating for the development of offshore wind in NS?	Net Zero is a non-profit organization working to support the energy transition and efforts to achieve net zero emissions by 2050. Please see more on the NetZero website.
732	Section 8 – Socio-Economic Benefits The introduction accurately outlines the uncertainty for “pathways to market”, as clearly expressed in the statement: “Multi-billion-dollar OSW investments are not built on speculation. They require	Acknowledged.

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	<p>certainty of markets and power purchase agreements to secure financing.” (page 286). This is a pithy synopsis of the OSW investment dilemma. In the short term, Green Hydrogen will not be a reliable off-taker for offshore wind development because (i) early-stage offshore wind will be too expensive for Green Hydrogen to purchase; and (ii) Green Hydrogen producers do not have the balance sheet or credit history to permit banks to lend to offshore wind developers (ie., most offshore wind Proponents rely on banks to provide project finance to fund their construction, and banks need to see certainty of long-term revenue from a credible off-taker).</p> <p>If Green Hydrogen using offshore wind is a strategic priority for Nova Scotia, the province should consider providing a credit guarantee / backstop for Green Hydrogen producers for offshore wind procurement, to mitigate the risk of potential defaults and provide comfort to Proponents and lenders around off-taker credit risk. Alternatively, Nova Scotia could develop transmission and / or export routes to NE USA or Canada (i.e., to investment grade off-takers) to support the development of offshore wind market at scale.</p>	
733	<p>Section 8.4 Capital Expenditure per Offshore Wind Development and Construction Phase</p> <p>The NS RA suggests that initial CapEx for NS would be around C\$7 billion / GW (ie., C\$ 7 million / MW) (Table 8.4; page 292). Reference cases were used to arrive at that number, but many of these reference cases (Maine; California; both floating) have not obtained actual final CapEx pricing and projects in those jurisdictions are not currently proceeding; Fixed Bottom Foundations – many of the proposed fixed-bottom site locations (Middle Bank; Sable Island Bank) are far from shore by global standards (both well over 100 km from shore; over 120 km from likely inter-connection points) requiring (i) offshore substations; and (ii) lengthy HVDC export cables, which increase the overall capex relative to reference cases; Floating Foundations – Floating foundations remain more expensive than fixed bottom foundations, despite ongoing investment / innovations by industry and expectation that prices will decline over time. Notably, recent research and investment into floating offshore wind has declined over the past 12 – 18 months, likely delaying the speed at which prices decline over time; Given above, early-stage CapEx for Nova Scotia is likely higher than the C\$7 billion / GW proposed by the NS RA.</p>	Acknowledged.
734	<p>More context is needed around port development in both Section 8.2 and the DMDE report. The DMDE report goes into good detail in setting up different scenarios around GW ambitions and potential based on the PFDAs suggested in the first RA Interim Report. However, it is not clear from either report how the different port facilities can complement each other. Referring to the previous comment on global competitiveness, it is also unclear which of the ports analyzed are best suited to the deployment of floating OSW technology.</p>	Acknowledged. The Committee has made recommendations about how these issues get resolved and the DMDE report was not meant to be definitive. The recommendation to form a port working group is meant to create a forum to discuss and inform the discussion.
735	<p>If NS has an ambition of becoming a global leader in OSW, investments into port facilities should be based on future seabed licensing rounds that come after the initial 5GW, the ability to</p>	Acknowledged.

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	participate/support floating projects in Maine, as well as Nova Scotia's ability to carve out a competitive advantage in a global industry. Investments made in Nova Scotia ports today should be made with the future development of the industry in mind to ensure local benefits optimization and long-term success of this emerging Sector in both Nova Scotia and Canada.	
736	More attention should also be given to local port development in Nova Scotia based on the implications of the existing and future global outlook. Currently, components for offshore wind farms in the Eastern US are manufactured in Europe. However, given the ambitious GW deployment targets in the US and Europe it is unlikely that these manufacturing facilities will be able to meet the demand. Therefore, considerations on local port development should take into account the strategic potential for establishing manufacturing facilities in Nova Scotia in conjunction with other OSW port development considerations. The DMDE report mentions manufacturing potential briefly, but much more detail is needed.	Committee recognizes that when the market demand is established, this will determine the opportunities and need for maximizing Canadian contributions. The issues related to supply chain development and the potentially significant demand for labour are discussed in section 8 of the report and in the 21FSP report.

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Section 9. Data & Knowledge Gaps		
737	Data gaps with eel and Atlantic salmon - significant with respect to locating OSW farms	Acknowledged and an amendment has been made to section 9.2.1 subheading to address data gaps associated with information on fisheries more broadly.
738	How will data gaps be addressed and when will that happen? Note that we cannot monitor or understand effects until this happens	This is why the Committee has recommended a research initiative be established (see recommendation T1-1), to identify and address ongoing data and knowledge gaps. In the short term, CNSOER, in collaboration with other provincial and federal agencies, are identifying data gaps associated with WEAs and considering appropriate means to address them.
739	Concerns for habitat and species (turtles, whales, swordfish, sound, vibration). Impacts can be studied within proposed timelines and measures should be implemented to protect environment.	The Committee has recommended a research initiative be established (see recommendation T1-1) to identify and address ongoing data and knowledge gaps.
740	Specific concerns on the effects of EMF on lobster	Concerns related to the potential effects of EMF on lobster are presented in sections 2, 4, 5 and 9 and recommendations for addressing data and knowledge

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		gaps associated with this concern are made in section 10 under T1-1 (SSCRI).
741	In the report it is stated that the construction will offer new habitat for various species. This is due to the third dimension from the turbines added perpendicular to the sea floor. It is projected that this will be occupied by invertebrate species such as muscles and amphipods. The effects of changes in vibrations, noise, and possibly temperature in these newfound habitats is uncertain, yet this is not stated in the knowledge gap section. Furthermore, it is stated in the knowledge gap section that these new areas will be free of fishing and offer foraging habitats for the other species of the region (305). Though, this seems unlikely if avoidance of the offshore wind farm is the primary behavioural change of the predator species.	Text has been added in section 9.1.3 regarding vibration etc., for benthic organisms on "new habitat" structures.
742	Concerned for marine entanglements (including Right Whale) from floating turbine anchor lines. Electromagnetic field from turbines and lines also a concern, change in migratory routes	Additional text has been added to section 9.1.5 to address data gaps related to marine mammal entanglement. EMFs are noted in section 9.3.5.
743	Clearly articulate gaps in knowledge regarding Western/Sable and Middle Bank PDAs and that further study is needed before governments treat them as WEAs.	Text related to knowledge gaps specific to the PDAs is described in detail in section 6.
744	Section 9.1 - The proponent should prioritize the collection of species-specific baseline data for benthic fauna and pelagic habitat in the RA Study Area. This data collection should include species distributions, population dynamics, and seasonal migration patterns of key species, and should be complemented by long-term monitoring programs. This will be crucial for assessing potential impacts on both commercially important species and marine bird species in the context of OSW development. 2. Collaborative, multi-stakeholder research efforts should be fostered to bridge data gaps, ensuring both environmental protection and socioeconomic considerations are met.	The specifics of priority issues and data collection will be part of the outcomes of discussions under recommendation T1-1 (see section 10). These details need to be discussed and are outside the scope of the RA.
745	Section 9.2.1 - To improve the accuracy of impact assessments on local fisheries, the Committee and/or proponent should address the identified gaps in dataset precision. This includes efforts to gather more detailed data on fishing times, specific years of landings, and seasonal or species-specific activities. The report should outline a plan for filling these data gaps, either through targeted research or collaboration with the fishing community, to ensure a more comprehensive understanding of potential conflicts between OSW development and fisheries operations.	This is detailed in T1-1 in section 10.
746	Section 9 - The Committee should place more emphasis on the need for immediate, comprehensive research to close these gaps, especially in terms of environmental monitoring and floating turbine technology. Without detailed and specific data on these areas, any commitment to large-scale OSW development in the region could be prematurely risky and may overlook critical ecological, technical, and operational challenges.	This is detailed in T1-1 in section 10.

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747	Section 9 (pg. 303) "support provincial NGOs, research facilities and engineers, ocean scientists, ..." - What about Indigenous organizations and communities? Building capacity and benefitting Mi'kma'ki should be the priority of considering developing such activity in the Province.	Added "Indigenous organizations" to this list.
748	Section 9 (pg. 303) typo "Other others"	Corrected.
749	Section 9 (303-onward) Research is the best solution to knowledge and data gaps - This affirmation does not match the initial proposed timeline. Research takes time and having a start of construction projected for 2030 seems unreasonable.	The overall timeline for the initiation of the OSW industry is determined by the government. However, there is time over the next 5 years for addressing immediate and priority knowledge gaps. The Committee addresses this in the recommendations, specifically T1-1, in section 10.
750	Section 9.1.3 (pg. 305) Potential shift in species and displacement - Can we elaborate on this and what does this mean from a fishery perspective? Spillover effect or migration?	This is addressed in section 9.2.1.
751	Report Outcomes. Each Regional Assessment Report describes substantial and legitimate data and knowledge gaps, both in terms of the baseline data available, as well as in the effectiveness of mitigation measures to minimize impacts. Both Reports strongly recommend additional research to ensure impacts can be accurately assessed and mitigated with sufficient confidence. For Indigenous fishers, this means that until this missing data is collected, most project specific impacts in the marine environment can be neither be properly assessed nor adequately mitigated. As a result, the outcomes of any impact assessments undertaken in the absence of the recommended new data cannot be seen as legitimate.	Noted.
752	Timing: How, by whom and when will the data gaps be addressed and can the data and knowledge gaps be filled with sufficient confidence in the time available before the first wind project?	The Committee has made recommendations regarding these details in section 10 (specifically T1-1). It is unknown at this time what can be done before the first OSW project is initiated. There are multiple variables that will affect this timeline.
753	While gender-based violence (GBV) is discussed in section 5.7.4 Inequities and Barriers to Disadvantaged Groups (pgs. 199-201) and is identified as one of the categories to be studied in Section 10.2, T2-7 (pg. 330), it is not addressed in 9.2.2 Health Issues (pgs. 309-310). Consider including the project's studies on GBV in section 9.2.2. GBV has been deemed a public health issue by the World Health Organization. As the Project report acknowledges the linkage between Canadian resource development projects and GBV (pgs. 200-201), this can be included also in 9.2.2 Health Issues. Suggestion: Acknowledge and include GBV under 9.2.6 Health Issues: Housing and Other Services (pg. 311) as there is already acknowledgement of the potential increase in demand for medical and social infrastructure as a result of the Project and movement of non-local workers into the area.	Addressed and added to 9.2.2 Health Issues, added "social services" to housing and other services

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754	We would like to reiterate that the Scotian Shelf is used by several at-risk marine mammal species, most notably fin and blue whales. But precise information regarding their abundance and distribution is lacking and dedicated effort is needed to ensure offshore wind farms do not interfere with federal recovery objectives for these species and to design effective mitigation measures.	Text has been added to Section 9 to acknowledge importance to recovery planning of at-risk marine mammal species.
755	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.	Added to 9.1.2.
756	Page 313, section 9.3.7 – NRCan indicates that subsea cables are also particularly vulnerable in sediments with high organic content – something present in an unknown distribution on the Scotian Shelf yet has been sampled in several locations. These sediments are typically associated with areas that experienced subaerial conditions during the postglacial sea-level changes. This is discussed at length in the report accompanying the geological model described on page 1 of this response, including references to work performed in the North Sea.	The RA is meant to be high level and broad. Detailed information on subsea sediments and potential effects to cables including geological modelling will be explored as the industry moves forward and identification of key knowledge gaps are addressed.
757	Knowledge Gap Requiring Attention Climate Change Impacts: Section 9.1.6 discusses the need to monitor and understand the impact of climate change on the ecosystem of the RA Study Area. We recommend that this research also address the implications of climate change on OSW resource availability. Enhanced understanding of how OSW can integrate into broader energy systems and mitigate risks associated with climate-induced variability will be important for long-term energy planning and resilience in Canada and beyond.	The implications of climate change on the OSW resource have been noted in section 9.1.6.
758	Knowledge Gap Requiring Attention OSW Grid Integration: We acknowledge that grid integration lies outside the RA Committee’s direct mandate but, like port infrastructure, it is an essential consideration for establishing a successful OSW industry in the region. Paths to market are critical, and the electric grid serves as the backbone for delivering OSW energy to end users. Taking action to ensure appropriate, timely investments in the transmission grid is vital for attracting OSW investment to the region. Section 8.6.4 identifies two ongoing grid studies, and the recommendations from both studies will require consideration by provincial and federal levels of government.	Noted.

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759	<p>Pg. 304 “Almost a century of fishing activity and management has provided a basic knowledge of some of the pelagic species (especially fish) currently occurring in the RA Study Area. These data, however, are limited in many respects: they do not cover all species; they are often limited to seasonal information related to occurrence, fishing practices and commercial fishing priorities etc. and the studies/monitoring activities do not extend uniformly across the Scotian Shelf (see 9.2.1 below). Furthermore, there are ongoing changes taking place within the pelagic community that relate either to the effects of fishing pressure or to environmental changes – notably climate change. In order to assess the potential effects of OSW development, these data need to be augmented in time, frequency of monitoring and spatial coverage. An approach is outlined in section 10. There is far more than a limited and basic knowledge as indicated in the many overlooked DFO programs alluded to above – we know of historical and contemporary spawning locations, patterns of larval drift and retention, stock structure based on genetic analyses, seasonal distribution and abundance patterns, migration behaviour based on tagging, population dynamics and growth, etc. This information is available in scientific publications in journals, technical documents, and other publications. Unfortunately, none of it was reviewed in the Draft OSW Report giving the false impression that the banks are understudied and by extension, ecologically unimportant.</p> <p>The last sentence in the quote taken from page 304 of the Draft OSW Report serves to underscore the lack of appreciation/knowledge regarding the monitoring effort that DFO has expended for over 50+ years involving the assessment and research of fish and invertebrate species on the Scotian Shelf. In addition, there has been past collaboration with university researchers and graduate students either on major programs or particular species and stocks to further our understanding of the production dynamics of the Scotian Shelf ecosystem.</p>	Noted.
760	<p>Pg 305. “Since the collapse of the cod population and the shift towards a benthic-dominated ecosystem, a significant portion of the total fishery output of the RA Study Area has been comprised of benthic organisms, especially lobster, scallop, crab, shrimp and sea cucumber. Consequently, these are the species that are of primary concern from a socioeconomic point of view. Unfortunately, publicly available information about the production and harvesting of these species is limited. In the information provided to the RA Committee by DFO, landings of benthic organisms from large portions of the RA Study Area were excluded for privacy reasons. Requests for more details from some of the companies involved received limited responses.” This seems odd that landings data were not available, but no details were provided regarding what stock or species. Landings data are contained in the assessments of all the major invertebrate fisheries on the eastern Scotian Shelf (shrimp, snow crab and other crab species, lobster, sea cucumber). Given the lack of details of the request made by the</p>	Noted.

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	committee it is impossible to assess what really occurred and NAFO maintains a website where commercial data is readily available.	
761	<p>Proponents are not well-suited to collecting big-picture data independently to understand how the impacts of an individual proposed project might interact with the impacts of past, present, and foreseeable future projects. We note that the Committee appears to express a similar understanding when it concludes, in the Draft Report: Most data gaps cannot be easily addressed by individual proponents of OSW projects, but rather lend themselves to collaborative research and management on a broad scale and covering a large set of conditions. Model validation spanning various temporal and spatial scales is most effective when coupled with observation sets that span those same scales. While costly, if initiated early and planned to address priority concerns, research can provide a significant return on investment by facilitating investment decisions, project planning, and the identification of conflicts and opportunities.</p> <p>Realistically, it is neither efficient nor entirely fair to expect individual proponents to piece together the “big picture” through various disconnected sources of information held by government and others. In a situation where multiple individual proponents are contemplating projects of the same type within a region, the inefficiency of expecting each proponent to piece together the same big picture independently is even more apparent. This is one of the primary reasons why we have argued consistently that cumulative effects assessment needs to be carried out at a high level, by government or government-appointed bodies, to the extent that relevant information can be gathered and synthesized at that level. Cumulative effects assessment at the high level can and should gather and synthesize available information that has been generated by former, current, and prospective users of the area in question.</p> <p>Then, subsequent project-specific assessments can use that high-level data collection and synthesis as the basis for further analyses that ask how specific proposed projects might fit within the bigger picture. Information generated through project-specific assessments should then feedback up into the higher-level understanding of the cumulative impacts that have occurred, are occurring, and are expected to occur in the region, so that project-level assessments are continuously deepening our understanding of the big, high-level picture.</p>	Noted.
762	<p>While the breadth and scope of topics covered in the report is appreciated, DFO acknowledges gaps in available data and knowledge that may limit a thorough understanding of the potential impacts of offshore wind. These include:</p> <ul style="list-style-type: none"> • available fisheries data in relation to past and future trends. • life history stages for certain species (particularly for those with planktonic stages such as lobster, scallop, snow crab, finfish, etc.) that depend on the energy and mixing brought about by wind energy. 	Added to section 4.

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763	<p>Commercial fisheries data and knowledge gaps (page 308-309): “While DFO provides information related to commercial fish landings from the Eastern Canadian Commercial Fishing Dataset...” Note that DFO provided additional fisheries data to the Committee that are not mentioned. There is a later statement about “other datasets, such as the VMS recordings of vessel activity” but it is not clear what dataset is being referred to.</p> <p>Also note that all fisheries except for marine plants have logbooks, so data do exist within DFO’s Commercial Data Division regardless of what vessel is being used (though privacy constraints remain). Commercial fisheries data is grouped (e.g. over a ten-year period) likely due to privacy/sensitivity screens applied. It may be possible to provide further subsets of data to consider seasonality. The Committee is welcome to contact DFO directly to discuss any further data needs.</p> <p>The statement “Only logbook data from 2012 up to and including the 2021 season are included meaning that there is a 2-to-3-year lag before recent trends in the fishery are identified”, could be refined to be more accurate. The data are available, but they are not considered official until quality control checks are performed. Nevertheless, it is possible to observe trends in available data.</p> <p>Regarding the statement “Data do not include vessels under 35 ft. that may be fishing in the region, which means that all data are not fully captured.” While this is true for the ECCFD, note that all fisheries do require logbook data.</p> <p>Regarding the statement “...DFO, as the primary regulator of the resource, should be required to review their management regimes and regulatory processes in light of the changes that have and are taking place, including the likelihood of a new industry competing for space in the rich waters of the RA Study Area”:</p> <ul style="list-style-type: none"> • This recommendation appears out of scope of the Regional Assessment’s Terms of Reference. Further clarification on this recommendation would be helpful for DFO to respond. <p>DFO is consistently reviewing management and regulatory frameworks regarding the management of fisheries through fishery Advisory Committees and other policy meetings.</p>	<p>Noted. The RA is concluded. Minor revisions to text have been included in section 9. Clarification around the reference to DFO management practices appear in section 10 (T6-5).</p>
764	<p>Noise data and knowledge gaps (page 312-313): While it is undoubtedly challenging to summarize all the knowledge gaps associated with offshore wind, this section could benefit from additional information on the specific and priority knowledge gaps that exist in better understanding the impacts of underwater noise on marine life, given the breadth of research available on the topic and the level of engagement the Committee has achieved. The Ocean Noise Strategy will be important to guide future action, but the strategy itself acknowledges that there are many knowledge gaps surrounding ocean noise in general. Consider pointing to work done elsewhere (Europe, USA), on offshore wind farm noise</p>	<p>Noted. Amendments have been made to the text in section 9.9 to include reference to the Ocean Noise Strategy as a guide for future marine energy developments. Refer also to section 5.5.4.</p>

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	monitoring and the main knowledge gaps that remain. Also, note that the ONS is currently considered draft, and will be finalized after all public feedback is considered and incorporated.	

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Section 10. Recommendations		
11	Nova Scotia's moving towards sustainable energy is a positive step in mitigating the climate crisis and achieving net zero. As Nova Scotia is highly reliant on coal and other fossil fuels, having a significant renewable energy source will be incredibly transformative for Nova Scotians. That being said, the construction of offshore wind development must be conducted through the best available approaches that have minimal effects on our environment. This is especially critical to remember with Nova Scotia's fishing industry, which is a large economic contributor. While the regional assessment outlines compensation for commercial fishers in the site locations, the committee should consider other mitigative approaches, such as co-location. A co-location approach means that the offshore wind development would be actively managed with the fishing industry while sharing the same spatial area. Managing marine resources across different sectors would help ensure marine spatial planning is as successful as possible. Many fishers want to continue pursuing their jobs, and this collaboration would help minimize the displacement of fishing areas. It is critical to think of these adaptations now while developments are still in the planning stage, and mitigative approaches can be implemented, such as cable burial and clear corridors. This is an excellent path for Nova Scotia, so it is essential to take the time to think critically and outline best practices for offshore wind development.	The Committee discusses the need for a mitigation hierarchy in section T4-1, which includes co-location and/or co-existence of offshore users where possible. This is described as "Mitigation hierarchy theory (Poulton and Ray, 2023) in a regulatory context generally endorses a process where priority is placed on avoidance of conflict/impacts, and, where avoidance is not achievable, to apply economically practical mitigation techniques."
12	Shark tracker along the coast of NS. The species tuna and others are those that shark prey upon. Shark Tracker could be included in this SSCRI to inform the movement of other inter-related species.	Acknowledged. <i>Shark Tracker</i> is another example of an existing and ongoing research monitoring tool and program that the proposed SSCRI consortium could take account of in its research-coordination efforts.
13	Gaps in Indigenous consultation with both CNSOPB (NL and NS) boards, it was up to NRCan to lead consultation but there was breakdown in communications. The regulatory path is not clear as the boards would like it to be permits related to transportation and fishery.	This is outside of the Committee's mandate and scope and will be addressed by Natural Resources Canada/NS Provincial government and CNSOER through project-specific consultation processes.
14	What is in place to protect that within the 30-year time span? Talking about the timeline of the project, has there been any discussion about habitat species between now and 2060? Tuna? Leatherback turtle, EMF, sound, vibration.	The Committee has acknowledged these data gaps in section 9 and has recommended a research initiative be established (see recommendation T1-1) to identify and address ongoing data and knowledge gaps.

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15	When will the RA Report recommendations be acted on?	There is no legislated timeline for when the Minister will make the final report public, when a decision on the Committee recommendations will be made, and which recommendations will be accepted/acted on.
16	All the concerns raised by First Nations should be tabulated and saved so that they don't have to be recreated for the IA process and future proponents should be asked/or should show how these concerns have been addressed.	This is noted for future consideration. All concerns raised by Indigenous participants have been noted in the What We Heard Summaries (posted to the Registry), and referenced and changed in report.
17	IAAC/CNSOER/NRCan/NRR need to impose expiry dates on authorizations	This is outside of the Committee's mandate and scope and will be addressed at the project level.
18	How can the public and Indigenous people track recommendations?	Tracking the status of the Committee's recommendations is outside the scope of the Committee's mandate. The Federal and Provincial ministers are responsible for addressing all comments and recommendations outlined in the RA Report.
19	Develop a communication strategy to educate people on OSW	Acknowledged and amendment made to text in T7-1 stating the need for the Province of Nova Scotia to develop a communication strategy to educate the public on OSW.
20	Flag Shelburne as a community that should have a community profile done	It is outside the Committee's mandate and scope to recommend specific communities for community profile studies. The Committee assumes priorities will be determined by WEA designation and project proposals.
21	Academia not included in the SSCRI diagram? Not enough mention of the role of academia in driving this research collaborative, Dalhousie could be the lead for this initiative?	Acknowledged and amendments have been made to Figure 10.1.
22	Sipekne'katik want to be co-managers, at same level as federal and provincial governments. Diagram in PowerPoint presentation is misleading, Mi'kmaq are more than an interest group.	Acknowledged and Figure 10.2 has been updated to represent the need for an "Intergovernmental Working Group."
23	MEKS not necessarily the best approach, had issues in the past with study being biased for paying client.	The Committee recommended MEKS based on the feedback from multiple Indigenous communities, individuals and organizations.
24	As part of reconciliation, Sipekne'katik should be informed first, draft report should have been shared with Sipekne'katik prior to the public comment period.	Noted.

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25	“ESSIM/ESRF” funding model could be used for Recommendation #1.	Reference to the ESSIM/ESRF funding model has been added to T1-1.
26	Province can propose development in waters of provincial jurisdiction, including within the 25km buffer area).	Clarifying text has been added to the executive summary and conclusion to address this comment.
27	Consider precedents in guidelines/procedures for fisheries (including lobster) in Maine U.S.	The Committee has made recommendations (T4) related to the consideration of guidelines and procedures for coexistence and compensation for fisheries impacted by the potential development of an OSW industry.
28	Why 10 turbines to trigger Impact Assessment Act? Seems arbitrary.	This was determined during the development of the physical activity regulations for the <i>Impact Assessment Act</i> .
29	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, the Committee should provide additional consideration to culturally significant areas when determining potential locations of low conflict.	The Marxan with Zones Analysis was completed by DFO. Areas of cultural significance are not well known in offshore NS. As projects are proposed, this will be discussed and assessed (possibly through MEKs) at the project assessment level.
30	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	Noted. There is potential for cultural losses in general to be addressed through the bid criteria process in the form of Community Compensation/Development Agreements. In addition, from an Indigenous perspective, the Committee assumes that these topics would be discussed within the context of the Crown’s Duty to Consult.

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	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.	
31	What will be the selection criteria for the recommended Indigenous representative for the new Canada Nova Scotia Offshore Energy Regulator. How will appointee represent all Indigenous communities in Nova Scotia?	This is not determined by the Committee. The process determining representation will be done by the CNSOER.
32	Will there be engagement/consultation on any changes to the Collision Regulations due to future wind turbines	This is outside the mandate of the RA.
33	When discussing the key mitigation and monitoring measures for the fisheries, there is a recommendation for providing navigational aids/upgrades to fishers. Would these upgrades come at an additional cost to fishermen, or would this be considered within other available funding? (Section 5.6.4 – Page 187, bullet 5)	Further information on funding AIS recommendation is addressed in section 10.
34	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?	Refer to section 6.3 for buffer method explanation.
35	Will Captain's licensing (specifically we are thinking of the collision regulations) be updated to reflect new potential conflicts within the marine environment? Who will be responsible for revitalizing/reviewing this certification and the regulations?	This is outside the RA Committee's scope and mandate.

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36	<p>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?</p> <p>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.</p>	<p>Additional details are not available at this time and will be addressed as the planning for OSW continues. The Committee's recommendations address this (see section 10) including suggestions for engagement which may or may not include MEKS discussions.</p>
37	<p>We would like to see a recommendation to examine the feasibility of coexistence between OSW and the commercial, FSC, or recreational fishery. Currently there does not seem to be a recommendation that specifically addresses this issue (section 10.4).</p>	<p>The Committee's recommendations in T4 include any interactions with all fisheries. Specific FSC or recreational fisheries would be part of discussions at the project level.</p>
38	<p>Need for financial protections in the event of accident, malfunction, abandonment, or bankruptcy</p>	<p>Addressed in recommendation T3-5.</p>
39	<p>Need for Impact Benefits Agreements</p>	<p>The Committee has already considered IBAs, compensation, royalties, etc. IBAs are typically between project proponents and specific nations, and are often mostly confidential and are outside the scope and mandate of the RA.</p>
40	<p>Royalties should be considered in draft Report, similar to federal and provincial taxes collected on unceded Mi'kma'ki</p>	<p>The Committee has already considered IBAs, compensation, royalties, etc. IBAs are typically between project proponents and specific nations, and are often mostly confidential and are outside the scope and mandate of the RA.</p>
41	<p>Not enough educational spaces for Mi'kmaw people and issues with erroneous "self-identification"</p>	<p>Text in T7-1 has been amended to include specific mention of Indigenous students.</p>
42	<p>Criminal records often a barrier for Mi'kmaw employment where level 1 security required</p>	<p>Noted.</p>
43	<p>If an AIS system or other gets presented this pose two challenges: one is cost, who is going to pay for this technology. If they turn on their AIS they have to pay to use it. Second is privacy, if someone tracks</p>	<p>Acknowledged and amendments to the text have been made in section 10.</p>

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	them, they want to trust this info will be kept private and want this to be used for a specific reason and not put their competitive strength at risk.	
44	We will ensure our harvesters are protected, whether through EIS phase and through compensation. We want to know who is responsible for compensating at the various stages.	Details around compensation are outside the scope and mandate of the RA Committee.
45	Safety issues to the transiting and cost issues to the transiting. Can't be compensated unless we have evidence of activity in these areas. DFO was limited to the logbooks and landings, but the only thing required is the area fished which is not specific enough. If we don't have a complete methodology for an AIS, not helpful to compensation. Having AIS turned on within a WEA could be a solution rather than tracking fishing boats across the whole study area.	Noted. The Committee has provided a recommendation related to the need for AIS and/or a VMS (Vessel Monitoring System) described in T6-4.
46	You are advising there be a buffer zone, but the new clause says if a proponent wants to develop, they have to approach the FN and fishers to get approval. There shouldn't be a way around this buffer, this is perceived as leaving the door open. What constitutes support? Developers might approach Indigenous communities or fishers not tied to the community directly affected, this doesn't help local or impacted communities. We see this clause in the buffer is a risk.	Refer to section 6.3. A potential incursion into the buffer would require that the regulatory authorities, in conjunction with key interests, would be addressed at the project level.
47	Is there investment happening within NSCC and others to support programs in offshore wind?	Acknowledged and text has been added to T7.
48	Seats in a classroom, 20 seats for marine emergency duties. DBS training is for supply vessels and is required for the fishing industry, required to hold an A1 certificate, NSCC has already changed this course to accommodate the additional demand for that course in the marine industries. Now, we will be competing with another industry for seats in the classroom.	Noted.
49	Specific types of training are specific to the industry. Training for vessels: Transport Canada has training regulations and stringently enforced in Canada. I think NSCC is already on the path towards specific training requirements, they will be happy to see that recommendation in the report. I like to see "upscaling" in the report, and easier to remember and makes more sense and says what it is.	Acknowledge and support observation.
50	The tugboats aren't farther than 25kms offshore, there is no safety out there.	Noted.
51	If developers put into a compensation fund, they have to address development or research concerns which were tied to the project's conditions for approval. If you responded to the question about fisheries research fund, you got the bid. In oil and gas, compensation was in the form of fisheries research. The language in this recommendation needs to be given to the federal or provincial governments to fund and support this working group to make sure it is sustainable. Is this a core funded project? They could easily put 10 people together to form that working group. Even if this recommendation identifies who is responsible for setting up this working group?	The SSCRI recommendation is intended to address research gaps/priorities. The Committee has identified the need for core funding, participation funding and funding of the actual research program. It would be the role of the SSCRI to source the research funds. The bid criteria could include a research component.

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52	T3-6 – potential reduction of existing abandoned exclusion zones. Wondering if the purpose of getting rid of the buffer was to put the cables there, and essentially increase exclusion from the fishery, but if that was recommended to minimize impacts to the fishery, that’s fine. Need to consider what array cables will be installed within the existing corridor and what will be added. I like the idea of us reclaiming the bottom if there is an active fishery in that area.	The Board hasn't been able to confirm this information, and we have had no response from CHS. T3-6 has been removed.
53	As a whole, I believe that this opportunity to enhance wind power generation in Nova Scotia is a step in the right direction for the province's energy grid. As outlined in the Regional Assessment of Offshore Wind Development in Nova Scotia document, there are various factors to consider to ensure these projects are done right. Among these considerations, I believe it is crucial that we understand the intentions of prospective developers of these projects. This is important to ensure that the developers have the best intentions for Nova Scotians in mind when undertaking these projects. Accounting that our offshore regions will be impacted by these developments, it should be absolutely clear that Nova Scotia will obtain tangible benefits from these develops. Therefore, I believe that thorough background checks into each company should be undertaken to protect our environment and resources from potentially exploitative developers.	Reviewing the responsibilities of OSW companies will be done under the discretion of the CNSOER at the project-level.
54	T1-1 - Make sure people can still do their own research and seek their own outside funding. Flexibility.	Amended wording in T1-1 recommendation to ensure researchers can participate in OSW R&D through their own funding in addition to SSCRI funding.
55	Need equitable participation in employment, contracts, training.	Noted. See modifications to T7-1.
56	Cultural losses – ongoing discussion, form of compensation?	See response to #94/10.
57	Mi'kmaw lands to be considered, Indigenous Knowledge, Indigenous monitors, assisting in validation, important traditional fisheries	Noted and addressed throughout the report.
58	Important to consider regional vs. local approach, more manageable.	Noted.
59	Report should assign ownership on recommendations to better ensure implementation	The OSW industry is in the early planning stages at this point. Ownership for specific recommendations will need to be discussed further, see T4 for related Committee recommendation.
60	If Collaborative Research Initiative, Adaptive Management and broad engagement recommendations will be long standing, beyond the construction phase	Text has been added to T1-1 and T5-1 related to the need for ongoing research and assessments beyond the OSW construction phase.

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61	Need space for Mi'kmaq First Nations to work in offshore wind projects, work in boats.	Text has been added to T7-1, specifically stating "Engagement of the Mi'kmaq of Nova Scotia in the OSW sector would be enhanced through the development of scholarships, bursaries and apprenticeships targeted at Mi'kmaq communities."
62	Important to include Mi'kmaq and provide funding. Funding criteria/scope should be determined by the Mi'kmaq, which is needed for meaningful engagement	Refer to the Committee's recommendations T1-2 and T-5. Funding criteria (for funding under IAAC) are determined by IAAC with regards to amounts and qualifications.
63	Mi'kmaq communities need to decide how they want to be engaged	Noted.
64	Recommend an interdepartmental Working Group between NS and New England on offtake and meeting targets.	The Committee has suggested initiation of working groups in the recommendations (see section 10). It is expected that collaboration at that level will involve consideration of how to meet targets and of off-take issues.
65	RWSC is an impressive collaborative in the US, with industry involved. Having something similar in Atlantic Canada would be great.	Acknowledged and mention of RWSC has been added to T1-1.
66	Employment and training should be shared at community-level, including with labour officers. Training important, including women needing to increase their welding hours opportunities.	The Committee has described the need for employment and training to be shared and included in section 5 and section 10 recommendations, specifically T7.
67	Cultural inclusion and competencies need to be developed. Awareness training is important, including knowledge of ceremonies like smudging	The Committee has described the need for cultural inclusion and competencies in OSW training in section 5 and section 10, specifically T7.
68	Needs to include capacity funding and consideration such as community transportation	Noted.
69	Need to recognize barriers in education and training	The Committee has described the need to recognize barriers in education and training in section 5 and section 10, specifically recommendation T7.
70	Wondered if you've looked at Port collaboration in other jurisdictions in the North Sea. Who do you see taking leadership to put the Advisory Group together in NS or Atlantic Canada?	Clarification has been added to recommendation T2-1, specifying an "Atlantic Canada" OSW Port Coordination Group.
71	Did the port advisory group come together before or after the auction round in Ireland?	Not applicable to the RA.

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72	Need a Port Strategy province wide.	Clarification has been added to recommendation T2-1, specifying an "Atlantic Canada" OSW Port Coordination Group.
73	Regional Enterprise would be well suited to conduct the community profiles recommendation and could help to address some of the issues you would be looking at. Groups should work together but community profiles should be community-led.	Development and execution of the recommended community profile studies is outside of the Committee's scope and mandate.
74	10.7 Theme 7: Education and Training (Page 343) The Committee is also aware of a secondment within NSCC which it understands was designed to assist in province-wide program planning to meet the workforce development needs for renewables, including OSW.	Knowledge of NSCC's role in supporting renewable energy development with education and training has been noted in T7-1.
75	(Pg. 316) Section 10.1 - Agree with the mention that funding is needed, but it is critical to allowing space for Mi'kmaw communities and organizations to be involved in how they want the funding allocated and considered. Collaborations are highly important to create a join-effort in research/data collecting/knowledge sharing (i.e., creating and having space to include FN's boat operators/technicians/etc.). Collaboration is a great step forward for truth and reconciliation.	Acknowledged. The report addresses this in a general manner. It is inherent in recommendation T-2 to "Fund and MEKS" that there will need to be a discussion with any future MEKS provider, and funding will be based on what is available in budgets at that time, whether commissioned by government or industry.
76	(Pg. 316) Section 10.1 - Will research after decommissioning be considered to examine the impact and/or benefits of Offshore Wind in Nova Scotia waters?	Decommissioning has been added to T1-1.
77	Has the Committee been thinking about timelines for the recommendations?	The Minister will decide which recommendations to implement and the timeline for implementation however; the Committee, while resisting being presumptuous or overly specific on the prioritization or mechanics of implementation, has attempted to provide enough detail to enable and guide effective implementation should the recommendations and the spirit of the report be adopted and the industry advanced.
78	Will any of these recommendations be Proponent funded?	The Committee has provided recommendations in section 10 for participation funding for the SSCRI (T1-8), and for the Fisheries Working Group (T4-6) to address co-existence and compensation.
79	Has RA thought about a follow-up program for the RA?	A follow-up program is a potential mechanism for ensuring that the Regional Assessment remains valid and up to date and is fulfilling the intended function of

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		informing decision-making. The design and implementation of this type of program would be up to Ministers based on decision related to the Committee's recommendations.
80	There is a bottleneck in MEKS practitioners. Make it a mandatory step in the IA process. Would this be an amendment to the act?	Currently an MEKS is not a requirement under <i>the Impact Assessment Act</i> , but the Act does require that community knowledge be considered in impact assessments. Note that recommendation T1-2 does recommend that developers undertake a project specific MEKS.
81	Beyond fisheries, there is also interest in offshore aquaculture. The limit at this time is regulations/policy. Though there will be less a chance of overlap with a 25 km buffer. However, there could be interest down the road with co-location if materials need to be 'ferried' to 'off-shore' locations.	Acknowledged and text has been added to section 4.7.7.
82	Indirect and cultural losses to the fishery, these cannot always be compensated for	Acknowledged.
83	cumulative effects assessment needs to be supported under the SSCRI, both positive and negative	Acknowledged and Cumulative Effects Assessment has been added to the SSCRI recommendation.
84	Add Dalhousie to T7-1. Consider what the demand will be in Canada and potentially promote collaboration between institutions in other jurisdictions	Inclusion of universities and potential for international collaboration has been added to T7-1.
85	Lots of data that needs to be collected. Has there been consideration on if this data should be open source data? Need consideration on how data will be managed under the OER based on the breadth of kinds of data. Data management should be considered at the beginning of the process	Acknowledged open-source data in T1-3
86	Considerations: <ul style="list-style-type: none"> • Structured / managed approach to fisheries compensation would provide greater transparency and equity. • Need for consideration of compensation for cultural losses. • Seabed allocation should consider benefits for future generations and long-term industry sustainability (i.e. qualitative factors) over short-term benefits (pure monetary). • Power procurement offers another opportunity to incentivize qualitative / socio economic benefits. • Opportunity for Canada and Nova Scotia to lead the world by setting out new industry in a manner that supports reconciliation. 	Noted.
87	General comments: <ul style="list-style-type: none"> • Applaud committee's efforts to compile relevant data 	Noted.

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	<ul style="list-style-type: none"> Further development of publicly available datasets would support industry, rightsholders and stakeholder as industry evolves 	
88	<ul style="list-style-type: none"> General comments: Support committee's recommendation for seed funding to assess investment requirements for enabling infrastructure. Consideration of government led vs. industry led development options and impact to sector development and competitiveness. 	Noted.
89	Considerations: <ul style="list-style-type: none"> Further studies can refine port requirements to reflect development scenarios per leasing timeline, assessment of impacts of US administration change, engagement with developers with respect to proposed design / construction strategies and alignment of construction timelines. Generally, ports have need for early development funds (beyond seed funding) to bridge gap between the required start of engineering/planning works and the ability of OSW developers to commit. Privately owned ports will typically need c. 15 years of likely capacity pipeline to support project economics. Beyond the needed transmission lines, consideration of planned/managed vs sequential, independent interconnection designs for OSW projects can have significant impacts on long term costs, upfront investment requirements as well as environmental impacts. 	Noted. Refer to sections 4 and 8.
90	General comments: <ul style="list-style-type: none"> Expanded development areas allow developers to better optimize site selection, increases market competitiveness and reduces consumer price impacts. Inclusion of Tier 1 and Tier 2 areas positive as it provides industry and stakeholder insights into future potential development areas. 	Noted.
91	Engagement/participation of First Nations communities in collection and management of shared data (T1-3, T1-6) particularly as it relates to environmental conditions and cultural heritage/archeology. Agree with the need to fund Mi'kmaw Ecological Knowledge Studies. (T1-2)	T1-3 is focused on developing a repository and T1-6 refers to T1-1 where Indigenous organizations are included.

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92	<p>Follow-on port studies would benefit from clarification on proposed leasing timelines and analysis of impacts of recent US administration change on development scenarios and port capacity requirements. There may be need for additional funding beyond initial seed funding to bridge gap from required start of port development to likely OSW developer ability to make a port level commitment. (T2-1)</p> <p>A more detailed and specific Labour Market Analysis would benefit the industry, the public, and the Mi'kmaq of Nova Scotia. This work should include an element that focuses on the availability, readiness, and needs of Mi'kmaq people to be full participants in all aspects of OSW economic opportunity (e.g., from labour to trades to professional positions). (T2-4)</p> <p>Analysis into potential for allocation of apprenticeships to members of indigenous communities and engagement of indigenous owned businesses. (T2-5)</p>	Noted.
93	<p>We do not support the development of marine energy infrastructure in the Western / Emerald Bank Conservation Area and would request that this area be removed from the PDA. (T3-2).</p> <p>Specific plans for meaningful engagement with local First Nations communities and demonstration of engagement of indigenous owned businesses into supply chain development and labour development strategies should be integrated into initial bid evaluation criteria. (T3-3)</p> <p>Strength and regional suitability of coexistence plans with other marine users, particularly fisheries should also be considered in either the first or subsequent bidding rounds. (T3-3)</p> <p>Consider integration First Nations nominee into any evaluation committee. (T3-3)</p>	PDA specific KMKNO feedback has been added to PDA tables in section 6.
94	<p>While the need for compensation for economic losses is well understood, losses related to cultural / traditional fisheries and use of the marine space need to be addressed as well. Recognizing that this is a complex issue, further consultation with FN is required as development progresses to determine appropriate compensation structures. (T4-1, T4-2)</p>	Noted. There is potential for cultural losses in general to be addressed through the bid criteria process in the form of Community Compensation/Development Agreements. In addition, from an Indigenous perspective, the Committee assumes that these topics would be discussed within the context of the Crown's Duty to Consult.
95	<p>Acknowledge the importance of the assessment of cumulative impacts and the necessity of fulsome engagement with Mi'kmaq people in these assessments. (T5-1)</p>	Indigenous peoples are already included under T5-1.
96	<p>Supportive of inclusion of Mi'kmaq nominee on CNSOER board as a measure to support ongoing engagement of First Nations communities. (T6-2)</p> <p>Supportive of recommendation for project-specific impact assessments for all OSW projects. (T6-3)</p> <p>Funding support may be required to enable all vessels to be equipped with any mandatory or recommended vessel tracking system. (T6-4)</p>	Noted.

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97	Engagement of the Mi'kmaq of Nova Scotia in the OSW sector would be enhanced through the development of scholarships, bursaries and apprenticeships targeted at Mi'kmaw communities. (T7-1, T7-2)	Added to T7-1.
98	Similarly, we hope the RA Committees will convey in the strongest possible terms that the completion of the RAs should not be used as a trigger or justification for government to exempt offshore wind developments from project-specific Impacts Assessments. It would be deeply troubling if our involvement in and support of these RAs culminated in the removal of project-specific assessments, rather than the ultimate goal of better-informed, tiered decisions about offshore wind.	Noted.
99	The federal and provincial governments should have been doing much more consultation on the development of the offshore wind sector. Our office expects more for the Mi'kmaq from the federal and provincial governments moving forward as the offshore wind sector develops.	Noted.
100	Given the importance of Mi'kmaq engagement in this process, we would recommend that a Plain Language Summary be prepared. This would benefit the general public, rightsholders, stakeholders, and Mi'kmaq individuals, organizations, and communities. Consideration should be given to producing this documentation in Mi'kmaq.	A Plain Language Summary in Mi'kmaq language is being completed for the Final RA Report.
101	The progress made through co-management efforts, compliance measures, and industry collaboration demonstrates the strength and resilience of the Mi'kmaw approach to fisheries management. Ongoing dialogue and cooperation with the Mi'kmaq, proponents and regulators will be essential in addressing the remaining challenges and advancing the recognition of Mi'kmaw self-governance in the fisheries sector.	Noted.
102	The precautionary principal is an excellent approach considering the knowledge and data gaps presented in the RA. However, DFO and other marine users are moving towards an ecosystem-based fisheries management (EAFM) approach which combines policies such as the precautionary approach found in the 2009 Sustainable Fisheries framework. In 2024 the DFO found that an ecosystem-based approach would better address impacts of climate change. KMK encourages the RA to include EAFM as a key principle. EAFM aligns well to Mi'kmaw values which understand the environment in a more holistic way that does not segregate or prioritize.	The move towards EAFM is acknowledged. The reference on the precautionary principle was in relation to how the RA was conducted. How new processes will be incorporated remain to be determined.
103	Priority must be given to Mi'kmaq led initiatives that allow The Mi'kmaq of Nova Scotia to demonstrate self-governance in Mi'kma'ki. These initiatives include (but are not limited to) Marine Protected Areas, Indigenous Protected and Conserved Areas and other areas The Mi'kmaq are trying to preserve for the next seven generations. This includes in our waters where turbines will be deployed as well as on our lands where substations and transmission lines will be commissioned. It is crucial The Mi'kmaq are wholesomely included as Rights Holders and are allowed to demonstrate this ability to self-govern as the offshore wind industry is developed in our unceded territory.	Throughout the Report, the Mi'kmaq are mentioned and included in recommendations for full participation in future work and engagement.

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104	<p>The committee includes a number of recommendations, but these are not presented in an actionable format. The following additions would make the recommendations more likely to be enacted:</p> <ul style="list-style-type: none"> • Include suggested ownership of the recommendation (e.g., which group would be responsible for enacting the recommendation). • Include measurable parameters for tracking progress (e.g., a reporting timeline on progress; a specific summary of data). • Provide a template for a recommendations-report-card so that updates can be regularly and plainly communicated. • Prepare a separate stand-alone recommendations report so that it can be more easily accessed, shared and disseminated. 	<p>The Committee cannot prescribe detailed approaches around timelines and responsibilities at this time. The decision to accept recommendations lies with the Minister and only then can additional details such as timeline and responsibilities be determined. However, while the Committee has resisted being either presumptuous or overly specific on the prioritization or mechanics of implementation, it has attempted to provide enough detail to enable and guide effective implementation should the recommendations and the spirit of the report be adopted and the industry advanced.</p>
105	<p>We recognize that more needs to be done in the transition away from fossil fuels, and we would be encouraged to see the Mi'kmaq at the forefront in various renewable energy projects. With the provincial and federal governments making NetZero targets to transition Mi'kma'ki away from fossil fuels and with Nova Scotia's primary source of electricity being coal generation, we recognize that other sources of energy are needed to meet these targets. However, meeting these targets must not come at the expense of the Mi'kmaq or our constitutionally protected rights.</p>	<p>Noted.</p>
106	<p>Information on the next steps of the process is currently lacking. Participants in the process should be provided with a roadmap that outlines next steps, including the timeline associated with Ministerial consideration and a commitment to publishing the final Strategic Assessment to CEAR, along with follow-up to participants of the process.</p>	<p>Additional information will be shared by relevant regulatory agencies and the CNSOER as key activities progress.</p> <p>The Committee cannot prescribe detailed approaches around timeline and responsibilities. The decision to accept recommendations lies with the Minister and only then can additional details such as timeline and responsibilities be determined. However, while the Committee has resisted being either presumptuous or overly specific on the prioritization or mechanics of implementation, it has attempted to provide enough detail to enable and guide effective implementation should the recommendations and the spirit of the report be adopted and the industry advanced.</p>
107	<p>Significant focus will need to be put on the development of fair and equitable compensation structures for both Mi'kmaw and non-Mi'kmaw commercial fisheries.</p>	<p>Noted.</p>

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108	Commercial fisheries - further research , encompassing the analysis of DFO's communal and commercial fishing data, is imperative to clarify the real, anticipated impact of OSW development on the fishery economy. Thorough examination and inclusive dialogue are necessary to design compensation frameworks that promote fairness, transparency, and mutual benefit among all parties involved in OSW development and fisheries management in Atlantic Canada.	Noted.
109	Marine SAR and MPAs - The largest potential impacts to fish and marine mammals were determined to be responses to UWN and EMFs . UWN is largely anticipated during the construction phase whereas EMFs are largely anticipated during the operation phase. Further research and mitigation measures largely directed at effects of UWN, the anticipated effects of an OSW development in the Study Areas may be minimal.	Noted.
110	Avifauna - Further information is needed for all coastal bird groups for a full picture about their risk from OSW development. As OSW developments are away from the coast and valuable bird habitat, impacts may be largely limited to flight for most birds.	The RA is meant to be broad and high level. Some additional information on birds has been added but detailed information will be part of project specific impact assessment processes and dependent on project location.
111	Bats - Info about bat offshore migration routes is key to understanding the impact of OSW development on bats. Migratory bats have been found to be the most impacted by wind development through mortality from collisions with turbine blades and barotrauma. Some research suggests bats which forage far from shore may be attracted to the OSW development structures and localized increase in insect presence.	The RA is meant to be broad and high level. Detailed information on bats will be part of project specific impact assessment processes and dependent on project location.
112	Cultural Heritage & Archaeology - see submission pg. 55	Noted. Text to ensure that Mi'kmaw archaeologists are engaged has been added.
113	Data share agreements with KMKNO areas of concern with regulator - see submission pg. 55	This is outside the scope of the RA.
114	Mi'kmaw Rights - see notes see submission pg. 55	It is beyond the mandate of the Committee to address Indigenous rights.
115	Forecasting models and methodologies - see submission pg. 55	This is beyond the scope of the RA.
116	Integrated approach to developing regulatory pathways - see submission pg. 56	Noted.
117	Adopting MEK in resource management planning is crucial for Canadian renewable energy development (Mi'kmaq Ecological Study, n.d.) Etuaptmumk or Two-Eyed Seeing, coined by Mi'kmaw Elder Albert Marshall, is an approach to using both Mi'kmaw and Western ways of knowing and is used to respect different knowledge systems while informing resource management decision-making (Bartlett et al., 2012; Warrior et al., 2022). The regulators should outline how to use MEK in consultation planning, enhancing transparency and free prior and informed consent (FPIC) (Warrior et	Noted.

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	<p>al., 2022). It may be necessary to allocate additional funding to employ Mi'kmaq Ecological Knowledge experts, liaisons, or consultants during project development (Community Ownership of Renewable Energy, 2023). OSW developers should include MEK studies and diverse insights to understand the unique impacts Mikmaw communities face from development projects and to mitigate issues that can arise from differences in ecological practices and belief systems (Nogmaq et al., 2024). It is important to note that MEKs do not constitute consultation themselves or replace the need for ongoing consultation with Mi'kmaq communities. MEKs should be fulsome in scope and focus on historical and contemporary use, cultural components, and values (Warrior et al., 2022, p. 1306). Additionally, there should be mechanisms in place for Mi'kmaq Ecological Knowledge to be shared with the Crown in a confidential or protected manner throughout the project's lifecycle (Miawpukek First Nation Comments on the Regional Assessment of Offshore Wind in Nova Scotia and Newfoundland and Labrador, 2022, p. 27).</p>	
118	<p>Clearly set out that DFO's work to date is not dispositive of its legislative requirements regarding fish and fish habitats and that DFO should provide access to all types of subject matter experts to better refine WEAs.</p>	<p>Noted.</p>
119	<p>Call on governments and regulators to provide a clear framework for operationalizing clause 98.7(c) of the Accord Acts (i.e. giving importance to fishing activities in the submerged land license process).</p>	<p>The Committee has made recommendations related to involving fisheries in as the industry moves forward. Please refer to section 10.</p>
120	<p>Reconsider its PDA and PFDA shapes on Western/Sable and Middle Banks in light of the fisheries and environmental information that is available to better protect the ECOSF and the communities that rely on the ECOSF.</p>	<p>Noted.</p>
121	<p>co-location assessment not being part of the recommendations?</p>	<p>See recommendation T4 in section 10.</p>
122	<p>The Draft Report should offer guidance on the regulatory measures that can be taken to protect marine ecosystems against the adverse effects of OWE. Although the Draft Report reviewed the existing conditions of ecosystem components in section 4, the Draft Report lacks recommendations and regulatory measures in this regard.</p>	<p>See sections 5 and 6.</p>
123	<p>The coexistence recommendation should be made with caution. After a few years, OWE sites act as marine protected areas and the hard-bottom habitat created by OWE foundations may increase the quantity of hard-bottom species. The likely ecological benefits arising from the artificial reef effects of OWE foundations and scour protections and exclusion of commercial fisheries are neutralized by allowing coexistence between OWE and fisheries.</p>	<p>Noted.</p>

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124	Biodiversity-related indicators should be set to monitor the impacts of OWE projects on ecosystems so that adaptive measures can be taken to avoid unacceptable effects on ecosystems.	Specifications around monitoring criteria will be developed at the project specific impact assessment process.
125	Section 10.1 - The Committee and/or proponent should incorporate a clear framework for integrating Mi'kmaw Ecological Knowledge and Indigenous perspectives into the early phases of the SSCRI. This should include provisions for long-term funding and capacity-building for Mi'kmaw organizations to directly engage in OSW research and influence research priorities. 2. The SSCRI should outline specific mechanisms to ensure Indigenous knowledge holders are included in decision-making roles throughout the research process.	The approach to incorporating MEK and Indigenous perspectives in the early phases of the SSCRI will be determined through discussions between Indigenous representation (e.g., KMKNO) and other members of the initiative.
126	Section 10.6 - Canada-Nova Scotia Offshore Energy Regulator (CNSOER) should be adequately resourced and funded well in advance of any potential bids. The report should include a realistic timeline for the creation of best practice guidelines, with clear interim milestones and a phased approach to ensure timely development, independent of the bidding schedule. Furthermore, capacity funding should be made available to Indigenous communities to support their involvement of the review and development of best practices.	The Committee has provided recommendations that the OER be funded to support the work of developing best practice guidelines in section 10.
127	(7.0 Recommendations) - We request that the Final Report includes a detailed analysis of the importance of fisheries to local and Indigenous communities as well as the role of fisheries in national food security. 2. The Final Report should clearly identify and depict the specific regions and communities where these fisheries are present and are most significant. This will provide a better understanding of the potential impacts on both local and national scales, ensuring that the necessary measures for protection and restoration are adequately considered.	The RA Final Report has acknowledged the importance of fisheries throughout.
128	General comment #2: Two different reports have been drafted for Newfoundland Labrador, and Nova Scotia. Our traditional territories are vast and do not conform to the same geographic rules the Provinces of Canada apply. Although we understand the specificities of each piece of the territory, the offshore wind energy, its specificities and potential impacts are the same. For coherence purposes, Reviewing two reports sharing at least half of the information would have made sense and be easier.	Noted.
129	General comment #6: Sipekne'katik has developed management plans for new fisheries that they currently do not fish but are looking to harvest as part of their Treaty Rights. Should a community want to explore other fishing grounds and new fishing opportunities, the maps of proposed development	Noted.

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	areas proposed in the report would not be adequate and offshore wind development will restrain the ability of First Nations to exercise their inherent Treaty Rights.	
130	Section 4.4.5 (pg. 129) Regulations for MPAs include prohibiting any activities that disturb [...] unless the activity is listed as an exception in the Regulations or approved by the Minister. - Before discussing the potential for offshore wind, it may be interesting to focus on the Marine Spatial Planning (MSP) opportunities around the Province. Activities such as offshore wind and protected areas can sometimes coexist, reducing the overlap with fisheries and additional fisheries closures.	Addressed in recommendation T1-4 (sec section 10.1).
131	Section 10.1 (pg. 317) T1-1 - This recommendation highlights the need to involve stakeholders in the process. What about rightsholders? They should be part of this new committee, not only informing it. Who will decide who is sitting at the table?	Text has been adjusted to add Indigenous Peoples.
132	(pg. 317) T1-1 "DFO is planning an expanded Marine Spatial Plan for the Fundy-Scotian Shelf region which aims to provide a valid foundation for any new initiative within the region and to embrace contributions from other departments and stakeholders." - What about the involvement of rightsholders in the process of making decisions and not once the decisions have been made? Are Indigenous peoples going to be part of this "new initiative"?	This is outside the scope of the RA. Discussions on involvement of Indigenous peoples will take place with DFO.
133	(pg. 320) T1-2 funding MEKS to key Indigenous organizations - Same comment as above. Should such studies be conducted, it should involve all communities and not limit its reach to a sole organization.	Organizations have been noted.
134	(pg. 323) T1-7 Open discussions with the State of Maine to contribute to and develop a mutually supportive research agenda associated with their proposed floating OSW test site - This should be considered carefully. Legislations and constraints are different in Maine, and the United States in general. Such discussions can be beneficial from a scientific and data-sharing perspective but should remain neutral from political and financial pressure regarding the development of offshore wind.	Noted.
135	(pg. 327) T2-3 Adopt a regional/national planning approach for the provincial OSW Roadmap - When was the MOU signed with Germany? It seems like, the need to develop offshore wind in Nova Scotia is indeed to produce hydrogen to be exported to Germany and other countries. This supports our concerns that the energy produced will not stay nor benefit the Province. It is, once again, a great concern.	Noted.
136	(pg. 329-330) T2-6 Establishment of targeted immigration and recruitment programs to attract foreign specialists - We should focus on building local capacity first by training local people.	As the Report notes, local capacity is not enough to reach the expected targets. While building local capacity is key, there will need to be more people to build this industry - that is the focus of T3-6.

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137	(pg. 331) T3-1 Potential regulatory loophole issue already mentioned previously	Noted.
138	(pg. 332) T3-2 Same comment as above regarding the definition of "Tier 1 PDAs"	Clarification on the tiered approach has been added to section 6.
139	(pg. 336) T4-2 Same comment as above: compensation should be the last resort.	Noted.
140	(pg. 337) T4-2 Fishermen instead of fisherman? Typo?	Modification made to T4-2.
141	(pg. 338) T4-3 The establishment of an industry-wide funding model based on equitable distribution of liability among OSW leaseholders - This recommendation needs clarification. It seems like the committee recommends "a multi-lease/project industry" to ensure the sustainability of developing offshore wind in the Province. If that is the case, it is greatly concerning. A multi-project industry does not adequately reflect the need for a precautionary approach. We do not know most of the potential impacts of the activity on the environment and species. A scaled industry based on adaptive management should be put forward.	The Committee assumes there will be a scaled approach and supports the precautionary principle in lessons learned.
142	(pg. 339) T5-1 Recognize that responsibility for cumulative effects is shared and tiered - Recognizing shared responsibility will not move the process along, especially since communication between different provincial and federal organizations is still very limited.	Noted.
143	(pg. 339) T5-2 Prepare guidelines and data sources for developers - Who will develop and implement those guidelines? Where does consultation with the Mi'kmaw fall in this process?	This is outside the scope of the RA.
144	(pg. 340) T6-2 Recommend First Nation representation on CNSOER Board - Who will decide on who the Mi'kmaw nominee is? How many representatives of the Crown will be on the Committee? It is important to ensure that everybody is represented equally. Additional discussions are critical before any decision is to be made.	Modification made to T6-2.
145	(pg. 342) T6-5 DFO to review their management and regulatory processes - We agree with the need to amend the Fisheries Act but the OSW should not be the first catalyst for such amendments. The government cannot just change the regulations as it pleases to make it easier for the industries to implement their projects. The Precautionary Approach should always be considered first.	Noted.
146	One of our major concerns is the potential impact of offshore wind (OSW) projects on Indigenous fisheries. APC acknowledges the efforts of the Regional Assessment Committee, which engaged with numerous Indigenous groups and gathered valuable input. We appreciate the opportunity to comment on the draft report and strongly support the recommendations proposed by the Committee, especially regarding ongoing Indigenous engagement and involvement in scientific research to address data gaps. In your commitment to reconciliation, we trust that our recommendations will be incorporated in the final Regional Assessment Report for Offshore Wind Development in Nova Scotia.	Noted.

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147	<p>2. Uniqueness. Indigenous fisheries are unique and different: First Nation fishers preferentially use certain gear types, target specific fisheries and have different economic and cultural motivations for fishing. In addition, different fisheries have different economic values thus loss of access to one type of fisheries may be more impactful than loss of another. Finally, the moderate livelihood fishery (like FSC fishing) is culturally unique; the moderate livelihood fishery is not well described in the Regional Assessments. Indigenous communities are planning to grow their fisheries, increasing the scale of current activities and expanding into new species not previously fished. This ability to grow and access new species, especially for moderate livelihood purposes, must be protected and maintained over the coming years.</p> <p>Recommendation 2: The uniqueness and difference of Indigenous fishing activities vs non-Indigenous fishing activities must be recognized and addressed in future project-specific impact assessments and compensation programs. Moreover, Indigenous fishing companies are economic drivers and significant employers in certain Indigenous communities and so potential differential impacts to employment must also be considered. Future impact assessments must also consider both the growth and expansion (taking of new species) of Indigenous fisheries.</p>	<p>Information related to Indigenous fisheries added to section 4.</p>
148	<p>3. Weather, Accidents and Set Aside Funding. Indigenous fishers point out that comparisons of North Atlantic metocean conditions to those found in the Baltic and North Seas (where OSW farms have been operational for many years) may have only limited usefulness. They note that even ‘normal’ north Atlantic winter weather is significantly harsher in offshore eastern Canada, compared to warmer and calmer northern European environments. In addition, cold water is denser and potentially more damaging to OSW farms than warm water. This in turn speaks to the need to ensure sufficient funds are available for emergency repair or decommissioning following a catastrophic weather event or bankruptcy. Fishers point out that those whose livelihoods are affected by OSW would feel exceptionally dissatisfied if money received by government as royalties or licenses fees (and which is intended for community benefit, job training, infrastructure repair, etc.) was instead used to pay for emergency response or decommissioning following an entirely predictable, yet intense, weather event. Neither the bankruptcy of Open Hydro nor the accidental loss of Shell’s drilling riser was anticipated in their respective Impact Assessments, yet Nova Scotian residents, fishers and taxpayers are left with the consequences. Recommendation: The Regional Assessments would benefit from a more comprehensive treatment of the potential effects of extreme weather on OSW projects. It would be useful to understand how often damaging storms currently transit the Nova Scotia Focus Area as well as the expected frequency of damaging storms over the next 10-50 years. In addition, if possible, it would be helpful to understand how OSW developers plan to address the issue of extreme weather events (and their increasing frequency): what preparation is possible and what response is likely?</p> <p>Recommendation: Accident and malfunction assessment and preparation, including the requirement</p>	<p>It is the CNSOER's role to ensure OSW farm design meets the environmental conditions in offshore NS, Operations and maintenance issues are dictated by the OEMs or inspection and maintenance program. This is addressed in T3-5.</p>

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	<p>that monies be set aside by the proponent to address unforeseen incidents, need to be transparently addressed in the impact assessment process, and in the regulations and requirements that guide project permits and authorizations. Recommendation 3: Government and the Energy Regulator should consider requiring proponents to hold insurance products that can compensate Indigenous commercial fishing enterprises in the event of sudden catastrophic impacts affecting these businesses.</p>	
149	<p>4. Impact Thresholds. Indigenous fishers support the application of the precautionary principle as outlined in the Nova Scotia Regional Assessment report. Fishers suggests that every project must establish an “upper threshold” for project impacts which, if exceeded, would trigger project abandonment and decommissioning. For example, if a wind farm license area measures 15 km x 15 km, and impacts are predicted to be not measurable at 5 km beyond this boundary, a project would be halted if impacts were in fact detected outside the predicted zone. This application of the precautionary principle is also consistent with recommendations related to transparency and decision accountability below.</p> <p>Recommendation 4: APC recommends that application of the precautionary principle is carried into the project-specific impact assessment and permitting phase; specifically, that the proponent defines an impact or set of impacts that, if realized, would require an immediate halt and project decommissioning.</p>	Noted.

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150	<p>5. Expertise and Decision Making. The Energy Regulator has no apparent expertise in fisheries and marine biology. Yet, through its authorizations to allow site assessment, construction, installation, operation and decommissioning, the Energy Regulator has decision making power to affect fisheries. Indigenous fishers seek to understand the basis upon which fisheries-related decisions will be made. Indigenous fishers and Indigenous research organizations such as CMM and UINR wish to participate in the ocean research recommended by both RA Committees. In fact, Indigenous organizations are seeking to build research capacity and create technical skills that will support their fishing industries.</p> <p>Recommendation 5: The Regional Assessments should expand their sections on Energy Regulator to include descriptions of the Regulator’s fisheries experience and expertise and/or source of the fisheries expertise they will rely upon in their decision making. Ideally, this would include Indigenous representation in decisions that may affect Indigenous fishing rights and activity. Recommendations should also emphasize a commitment to funding Indigenous-led research to build capacity, help fill data gaps and provide early access to research licenses.</p>	<p>At the time of the writing of the RA Report, the CNSOER had not yet been fully established. Fisheries experience and expertise and/or source of fisheries expertise for the CNSOER is still to be determined. While the Committee can, and has, note that Indigenous representation is important (e.g., consideration of UINR and CMM) in these matters, it is outside the mandate of the RA to go further and will be up to the CNSOER, NRR and NRCan. The Committee has made clear recommendations towards funding directed towards Indigenous capacity and research.</p>
151	<p>6. OSW Land Infrastructure. The Regional Assessments do not assess impacts of activities related to land-based infrastructure, such as onshore hydrogen plants, port facilities, and transmission lines on land. This means that land-based Indigenous interests and activities which may be affected by new construction or expansion of existing facilities are not assessed in the Regional Assessments. Importantly, this raises the possibility that there are unknown but tangible and significant data gaps and knowledge limitations (just like the Committees found for the offshore components). Given they have not been raised in the RA, these gaps might not be identified and addressed in the time available before full-scale project development, as the Committees recommend with respect to data gaps in the offshore. Furthermore, the fact that diadromous species use both freshwater and ocean environments makes them vulnerable to the adverse effects of human activities on lakes and rivers adjacent to expanding port facilities, new transmission lines, etc. Thus, non-assessed terrestrial activities may in fact have impacts on Indigenous fishing activity and by extension, Indigenous inherent rights.</p> <p>Recommendation 6: Once potential OSW license areas are identified, effort must be made to understand potential impacts from likely land-based development scenarios on Indigenous activities and interests. These impacts can be appended onto the Regional Assessment reports so that potential data gaps can be filled before project-specific impact assessments are begun, and likely impacts can be addressed in future impact assessments.</p>	<p>This will be addressed through other regulatory processes including assessments.</p>
152	<p>7. OSW Need and Use. The Regional Assessments do not consider eventual use of the electricity produced by OSW projects. As noted in the NL Regional Assessment, “participants have rightly observed that eventual use of the electricity dictates project design and location, and potential effects are tied to</p>	<p>The business case for OSW is outside the scope of the RA. The need for clear pathways to market has been referenced throughout the Report. The need for increased levels of education and public awareness has been noted</p>

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	<p>design elements (e.g., foundation type) and location”. Indigenous fishers also seek clarity on the need for OSW, given its potential risk to fishing rights, as well as the potential benefits that might be realized by Indigenous communities. Indigenous fishers note “these projects affect our land but do the benefits land here? What is the scope of royalties or other benefits can we expect, relative to the impacts we are risking?” Ultimately, Indigenous fishers are seeking both transparency and fairness.</p> <p>Recommendation 7a: APC strongly supports the NL Regional Assessment Committee’s recommendation that the provincial and federal governments, in collaboration with experts in offshore wind development in emerging markets, undertake initiatives to demonstrate the need for an offshore wind industry and communicate the results of these studies with the public to increase public knowledge of the role of offshore wind in each province’s energy mix and economy.</p> <p>Recommendation 7b: Provincial and federal governments should consider a separate royalty regime for Indigenous peoples. A reliable, predetermined royalty stream would benefit all communities and may help to simplify and streamline proponent-led impact and benefits agreements.</p>	<p>in multiple Recommendations. Issues related to fisheries compensation have been discussed at length and multiple recommendations have been made. Issues specifically related to Constitutional rights are outside the TOR.</p>
153	<p>8. Fisheries Data Gaps. By necessity, the fishing density maps used to create recommended offshore license and development areas exclude small boat fishing activity (<35 ft) and, if there are less than five vessel IDs, license IDs, and fisher IDs the data is screened out to protect commercial privacy. These exclusions mean that certain fishing activity, including potential Indigenous fishing, is not captured in the maps that show the final ‘low conflict areas’ most suitable for OSW.</p> <p>Recommendation 8: Once potential submerged land license areas are identified, provincial and federal governments must continue engagement with Indigenous fishery organizations to identify specific fisheries impacts (by vessel size, gear type, and species) within the license areas. At the same time, a dialogue on fisheries compensation must begin, so that the expectations of all participants can be shared before project specific IAs are started.</p>	Noted.

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154	<p>9. Path to OSW. The Regional Assessments have inconsistent and incomplete descriptions of the path to OSW; that is, the timeline, project milestones and regulatory/permitting steps that will be taken between early 2025 and “first wind”. This is understandable since the path to OSW was not defined at the time the Reports were prepared. However, there is an emerging expectation (among Indigenous fishers at least) that a “preliminary reference timeline” can be established in early 2025, then modified as needed in the future. Fishers wish to understand how fast this industry will emerge, the key steps that will be completed, and how much time is available to accommodate the recommended research needed to address data gaps. This is also related to recommendations made to encourage transparency and accountability in decision making. Recommendation 9: As a next step following submission of the final Regional Assessment reports, federal and provincial governments should release a timeline illustrating the path to OSW. The timeline would show the estimated start and finish of the key milestones of OSW; for example coming into force of any remaining regulatory changes, publication of OSW Roadmaps, publication of CER guidance materials on the Environmental and Socio-Economic Assessment referenced in the ORER Technical Requirements document, selection of license areas by government, start/finish of the call for bids process, start/finish of a project specific impact assessment, issuance CER authorizations, start/finish of the proponent’s site assessment process, issuance of major federal and provincial permits, fisheries compensation discussions, start of fisher exclusion, start/finish construction, etc.</p>	Noted.
155	<p>10. Project Specific Impact Assessments. Project specific Impact Assessments (IAs) are strongly recommended throughout both Regional Assessments. APC strongly supports these recommendations and is confident that project specific IAs will be undertaken. However, it is not clear whether an IA under the federal Impact Assessment Act (led by the Impact Assessment Agency of Canada) will be undertaken or whether the Environmental and Socio-Economic Assessment as envisioned in the Canadian Energy Regulator Act (managed the CER) will be substituted instead. Recommendation 10: The uncertainty regarding project specific impact assessments must be clarified: will OSW projects be subject to assessments under the Impact Assessment Act or the Canadian Energy Regulator Act, as well as the difference between the two processes. In addition, it should be clarified whether land-based components such as hydrogen facilities, port expansions and new transmission lines would be included in a project specific Impact Assessment.</p>	Clarification on project specific impact assessment process has been added to T6-3.

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156	<p>11. Expressed Concerns. Both Regional Assessments collected a substantial archive of Indigenous questions, concerns and suggestions. This archive represents a significant investment of energy, resources, and good faith on the part of Committee members as well as Indigenous participants and other contributors. Engagement is time-consuming yet will be required (and hopefully welcomed) as OSW planning moves forward. Given that this valuable collection of ‘recently expressed concerns’ already exists, there is no reason why it should not be used as a starting point for future engagement and discussions, saving time, effort, and participant frustration. The thinking here is that future engagement should not begin anew but should continue on from what has already been compiled.</p> <p>Recommendation 11: The compilation of submissions by Indigenous groups in Nova Scotia should be flagged as a critical document, used as a starting point for next phase engagement, and made available to proponents for future project specific Impact Assessments. During the course of future Impact Assessments, proponents should be tasked by the CER with addressing these concerns in a systematic and transparent manner to the satisfaction of Indigenous communities.</p>	Noted. All engagement documents have been posted to the Registry and are available as the engagement process around OSW continues.
157	<p>APC also understands that both Committees’ recommendations are not binding on the federal and provincial Ministers who commissioned these reports. Given this, we are concerned that the valuable and detailed recommendations made throughout the Reports will not be fully adopted, and in particular, the critical recommendations relating to additional research and data gathering will be incompletely addressed. To repeat, should this be the case, the legitimacy of future impact assessments would be doubtful.</p>	Noted.
158	<p>Funding</p> <ul style="list-style-type: none"> • Are government agencies such as DFO, ECCC and others who will be tasked with much of this work currently planning to undertake it? Will these agencies be sufficiently funded? • Will sufficient funding be available for other researchers, including Indigenous participants, to contribute to this work? 	The question of funding (how much, sources, etc.) will need to be discussed and determined by the federal government agencies.
159	<p>Coordination, Decision Making and Accountability</p> <ul style="list-style-type: none"> • How will APC know which (non-binding) recommendations will be adopted by the Ministers and which will not? Will there be a way to track this? • Who will track which data gaps have been addressed and which remain, coordinate additional work, and disseminate results? • What approaches will be used to determine that sufficient work has been undertaken; that is, who’s to judge the data gap research is conclusive? 	It is expected that the Ministers will make an announcement on which recommendations will be implemented and what the preliminary steps will be. The timeline for such an announcement is unknown.

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160	The report identifies the following areas where consultation with municipalities is critical for successful engagement with OSW: <ul style="list-style-type: none"> • Infrastructure requirements related to ports, supply chains, and grid connections • The municipal role in building and expanding social infrastructure (e.g. housing, childcare, schools, medical facilities etc.) to accommodate an influx of people engaged in OSW • The capacity and cost of municipal services such as water and sewer • The impact of OSW development on local tourism, and on physical and cultural heritage sites • Community health and safety concerns such as waste handling, vessel, and equipment activity 	Noted.
161	Along with the above-mentioned impacts on municipalities in proximity to OSW, communities where the main economic driver is the fishing industry will be required to balance the needs of that commercial enterprise with the needs of OSW development. NSFAM has heard from some of these municipalities and will support their efforts to better understand research relating to the implications of OSW.	Noted.
162	We acknowledge the potential of OSW to be a transformative economic investment in the province, and municipalities are interested in a gaining a clearer understanding of what opportunities exist to support the following socioeconomic issues you identified: <ul style="list-style-type: none"> • The participation of traditionally under-represented groups in education and employment • Comprehensive profiles of identified port communities to understand capacity and plan for OSW development 	As noted in section 10, the initiatives recommended by the Committee are responsive to these issues.
163	We urge other levels of government to consider facilitating innovative solutions such as Impact and Benefit Agreements between developers and affected municipalities to ensure the sustainability of communities who engage with OSW development.	Noted.
164	“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. 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.”	Clarification wording has been added to T6-3.

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165	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?	The Committee notes in the Report that developers, and many other stakeholders, are included in engagement.
166	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.	Noted.
167	Page 324: 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.	The Committee recognizes that a lot of work needs to be done. The initiatives recommended in section 10 note the leads for some of these initiatives, but details will need to be discussed and are beyond the mandate of the Committee.
168	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.	Noted.
169	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.	Acknowledged.

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170	<p>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.</p>	<p>The Committee's rationale for the buffer and how to manage potential incursions are discussed at length in the Report.</p>
171	<p>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?</p>	<p>Justifications for the 25 km buffer are stated throughout the RA Report.</p>
172	<p>Page 331: The buffer zone boundary takes into consideration:</p> <ul style="list-style-type: none"> • 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 	<p>Justifications for the 25 km buffer are stated throughout the RA Report.</p>
173	<p>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 socioeconomic 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.</p>	<p>Noted.</p>

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	Protective measures for sensitive areas is already in our legal system. The precautionary approach recommended here seems more as an unnecessary generalization.	
174	<p>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.</p>	Addressed in T1-7 and T7-1.
175	<p>Page 336: Compensation should not be addressed through bid criteria or become the subject of a nonmonetary 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?</p>	The Committee acknowledges the gap around the bidding process and has provided associated recommendations in T4.
176	<p>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.</p>	Noted.
177	The data gaps identified by the report and the resulting recommendations will require a broad, multi-year workplan to address, which is beyond the tenure of the RAC to deliver. To support the timely implementation of the recommendations and to ensure that identified gaps are not forgotten, we would suggest that an additional recommendation be provided that encourages the establishment of an Offshore Wind Regional Assessment Follow-up Program. This approach has been used in Atlantic Canada to support the timely implementation of recommendations from other Regional Assessments and its implementation in this context is necessary to complete the work begun by the RAC.	A follow-up program is a potential mechanism for ensuring that the Regional Assessment remains valid and up to date and is fulfilling the intended function of informing decision-making. The design and implementation of this type of program would be up to Ministers based on decision related to the Committee's recommendations.

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178	<p>Formalization of a Compensation Framework: A recurring theme throughout the report is the necessity of a robust compensation framework to ensure a long-term gainful co-existence with existing ocean users and new industrial activities, especially when legislative and regulatory guidance is absent. Unfortunately, this framework is unlikely to be fully developed in time for the first issuance of seabed tenure.</p> <p>This gap will create confusion for those enterprises intending to bid for seabed tenure and the harvesters that stand to be impacted by development. We do suggest that, until such time that a framework is in place, any bids for seabed tenure include a commitment towards supporting the implementation of a compensation framework and a demonstrated financial ability to deliver on it. Clear language on this reality should be included in the final report.</p> <p>We also note that compensation must extend beyond the simple act of fishing to include consideration of those impacts that may be indirect and affect harvesters far afield from development. For example, work in the Northeastern US has demonstrated impacts of offshore wind development to settling areas for larval scallop – impacts far away from the development itself. Harvesters affected by an offshore development, whether inside the perimeter of the development or not, must have a clear path available for compensation. We suggest that additional focus on compensation for indirect/cumulative impacts be presented in the report.</p>	<p>The Committee acknowledges that there is a gap. As discussed in section 2.6.5 of the Report, the approach to fisheries compensation varies significantly across jurisdictions. In jurisdictions where some form of compensation is required for economic loss, there are widely diverging approaches on issues such as who has standing to claim a loss, the types of loss for which compensation will be provided and for what duration, and the types of information required to support a claim for compensation. The issue of how to deal with fisheries compensation before any Guideline exists has been addressed in the revised wording in section 10 under T4-4.</p>
179	<p>T1-5: Provide funding to Mi'kmaw organizations for research on adaptive management: We note that adaptive management will be key to the long-term co-existence of the fishing industry with offshore wind developments. Research will be required to determine novel gear configurations suitable for co-location of fishing gear or the operational realities of steaming/fishing in and around future sites. For this reason, we would encourage that this recommendation be extended to all ocean users who will require adaptation to continue positive co-existence with the offshore wind industry.</p>	<p>The Committee feels that there are other options in the report and recommendations to enable fisheries groups to obtain the funding they need.</p>

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180	<p>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 behaviour and habitat use within the RA Study Area.</p> <p>This recommendation is strongly supported by the fishing industry. We suggest that the scope of information should be extended to other aspects, including:</p> <ul style="list-style-type: none"> • Commercial fish species and the ecosystem resources they rely on; • Full understanding of the pre-construction conditions of the gyres and flows in the region of the study sites; • Current use of these areas by the Department of Fisheries and Oceans ecosystem surveys, including advance preparation to address where stock assessments may be impacted by the loss of survey sites; and, • The inclusion of other, comparable sites that will not be subject to offshore wind development to act as reference areas to inform a complete assessment of impacts. • The collection of this information will help support impact delineation and assist in future regulatory processes. • We suggest that this information should be used to support a whole of region effort to better understand the impacts of offshore wind on all aspects of the marine ecosystem, including impacts on both biotic and abiotic factors. This work should be undertaken under the guidance of subject matter experts in science and policy with the input of the fishing industry and other stakeholders to help provide a thorough understanding of the direct and indirect impacts of offshore wind development as seabed tenure processes and frameworks around compensation, co-existence and mitigation are developed. This important work would then help the implementation of recommendation T6-5. • We also encourage stronger language on the timeliness of implementation. A data collection program should be initiated immediately to prepare for construction/operation in the coming decade. 	<p>Comments on the data gathering priorities are noted. The Committee has recommended (T4-2) that on the identification of a WEA(s), effort be undertaken to more precisely define fishing activities; this could be expanded to include identified gaps in ecosystem characteristics. The Committee's expectation is that the SSCRI (T1-1) will assist in prioritizing research initiatives, and it is hoped that collaboration with other jurisdictions such as specifically recommended with Maine (T4-3) will increase understanding on issues related to co-existence and mitigation. The Committee also notes the fishing industry involvement in Scottish Salamander floating demonstration project and would add this to the list of priority outreach for Nova Scotia.</p>

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181	<p>T2-4: Initiate socio-economic studies for key communities.</p> <p>We have concerns that the scope of this recommendation is unnecessarily broad, and this lack of precision may impact meaningful execution. We suggest that some level of clarity be brought to identify what the focus and outcomes of these studies should be. For example, should such a study be on the county level or the municipality? Would it include aspects related to the human cost of large-scale influx of temporary workers to these areas or would it instead focus on the longer term? Does it include the impact of a harvester no longer being able to tie up a local berthage due to space competition from offshore service vessels?</p> <p>We appreciate the importance of this recommendation but suggest that further clarity is required as to what it intends to achieve.</p>	<p>Acknowledged. As described in T2-4, the Committee recommends that these socio-economic studies for key communities' work should be broader in scope than that normally undertaken in a land use planning context. It needs to be interdisciplinary and collaborative between pertinent provincial departments, with the municipal authorities, with representative Indigenous groups and other equity deserving groups. The Committee has discussed some of the important potential impacts to communities in sections 5.7.2 and 8.6.5 and the need for early identification and mitigating plans. The T2-4 recommendation is that the socio-economic studies for key communities are to be broad in scope and interdisciplinary and collaborative in nature, involving pertinent provincial departments, municipal authorities, Indigenous and other equity deserving groups and members of the public. It is suggested that the prioritization of this work will to some extent be informed by the identification of WEAs, the issuance of Submerged Land Licenses and the filing of project descriptions that will provide a more comprehensive picture of the expected activities and communities most likely to be impacted.</p>
182	<p>T2-6: Establish targeted immigration and recruitment programs to attract foreign specialists.</p> <p>While we agree that there is a need to bring expertise from jurisdictions with experience in the offshore wind space, we do caution that recognizing the benefits of offshore wind development will require a domestic pipeline of talent to service that industry. Reliance on temporary experts that depart with the completion of construction does little for the local economy and talent pool. We suggest that this should be reframed to indicate that these recruitment programs are a last resort when the domestic talent pipeline is unable to provide the necessary expertise. Furthermore, the focus should be on true immigration leading to residency as opposed to short-term contracts and relocation from Nova Scotia.</p>	<p>The issues related to supply chain development and the potentially significant demand for labour are discussed in section 8 of the report and in the 21FSP report.</p>

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183	<p>T3-1: The establishment of a 25 km coastal buffer zone.</p> <p>This recommendation is applauded by the wild fish and seafood sector. It is well-based and rooted in an understanding of the data gaps, sensitivities and concerns of the industry. While we understand that the spatial scope of the RAC is waters under joint management, we note that the basic reasoning that underlies the 25 km buffer all extend into those waters fully under provincial jurisdiction (i.e. jaws of the land). We feel that this recommendation would be strengthened by clearly highlighting that the pressures leading to this recommendation extend to the shore (and thus the recommendation itself should also be inclusive of those waters under Provincial jurisdiction).</p> <p>At this stage, we fundamentally disagree with the flexibility that is offered on this recommendation to permit development within this buffer and suggest this be removed. Our disagreement is rooted in the sheer lack of information we have on usage and ecological value of these environments.</p> <p>We also note that some of the basis underpinning this recommendation also applies to the larger area assessed by this process. For example, while it is true that precise harvesting patterns are largely unknown in the inshore areas because of monitoring requirements, similar challenges exist with fleets operating outside of that buffer as well where the set and pull locations differ substantially. In a similar fashion, data collection on valued ecosystem components tend to focus on inshore areas simply due to proximity, which can lead to a biased perception of importance relative to other areas.</p>	<p>Added explanation of internal waters in the Executive Summary and recommendation T3-1.</p>
184	<p>T3-2: The adoption of Tier 1 and Tier 2 Proposed Development Areas (PDAs).</p> <p>Providing a tiered approach to prioritization is sensible, although we would like to note that many of the information gaps described by those sites considered Tier 2 also exist for Tier 1 sites (i.e. precise usage patterns by the fishing industry, ecological values, oceanography, role of wind in the ecosystem), creating a fundamental question of what the real difference is in our knowledge base between the two classes. We do have concerns regarding the non-specific nature of how those sites Tier 2 sites may be considered for development. Our review of the language suggests that they would remain as Tier 2 until such time that a developer may be interested, which could happen overnight. For this reason, we suggest that some rigidity to when and how those Tier 2 sites may be accessed is needed. We suggest that those Tier 2 sites should remain out of consideration for a period of five years, allowing a more gainful assessment of current activities which can provide additional precision to the area identified for offshore wind development.</p>	<p>Further clarification on the tiering of PDAs has been added to section 6.</p>

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185	<p>T3-3: Development of Bid criteria and bidder pre-qualification.</p> <p>Clear bid evaluation criteria will be needed for consistent review and vetting of applications for development and must be consistent with the legislative framework governing granting of seabed tenure. While there is a reference to coexistence in the text of this recommendation, the fishing industry suggests that any bid should include a fulsome description of the current activities in the candidate site to ensure that any proponent is aware of who may be impacted and how compensation may be required. The requirement for consideration of fishing activities during the tenure process is a legislative requirement under s 98.7(c) of the newly minted Accord acts. Fulfilling this legislative obligation is important at the bid-review stage to demonstrate an awareness of existing users and a general understanding of the responsibility of a proponent, should existing users be impacted. The scope of damages eligible for compensation should be extended to include indirect impacts as well as those that impact the act of fishing directly. Given experience in other jurisdictions, changes related to the productivity and distribution of commercial fish resources stand to be altered both within and outside of offshore wind developments as a direct result of construction and operation of offshore wind farms.</p> <p>We also suggest that a call for bids should include a clear commitment of proponents to adhere to a yet-to-be established compensation framework. Until such time that the global compensation framework is established, bids for tenure should include an assessment of how a compensation program for that project may be constructed and delivered.</p>	<p>The Committee has recommended (T4-2) that regarding the identification of a WEA(s), effort be undertaken to more precisely define fishing activities.</p>
186	<p>T3-5: Requirement for adequate security related to abandonment and decommissioning activities.</p> <p>This is an important recommendation. Nova Scotia has a tarnished legacy of partially constructed renewable energy projects being abandoned, creating hazards to transportation, harvesters and other stakeholders. Sufficient securities for full site reclamation must be in hand prior to any sort of construction activity being undertaken to avoid yet another repeat of history.</p>	<p>Noted.</p>
187	<p>T3-6: The potential reduction of existing abandoned pipeline corridor exclusion zone. There is general agreement with this recommendation, especially given that the risk profile of the corridor has changed since abandonment. We note that impacts of any cabling through the pipeline corridor have not been determined in this report and remain a substantial gap in our understanding of the impacts of offshore wind energy.</p>	<p>Acknowledged. This will be described at the project level and through ongoing monitoring.</p>

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188	<p>T4-1: The establishment of a compensation regime to address economic loss <u>caused by exclusion based on the principles set out in T4-1(a) to T4-1(d).</u></p> <p>In general, we agree with the development of a compensation regime, but believe the scope as described is much too narrow. We note that it is not simply exclusion that harvesters are concerned with, but the real risk of ecosystem change local and further afield resulting from the installation of infrastructure, harvest of wind energy and associated loss of fishing power/economic efficiency for those activities that can be co-located with altered gear. Losses outside of the narrow scope of ‘exclusion’ must be considered. We suggest that the use of the term ‘exclusion’ be removed from the recommendation.</p> <p>We are also concerned that the expected timeline for the first call for bids will result in bids being received before such time as the proposed compensation framework is developed (discussed above). We suggest that T4-1(d) be revised to reflect that a compensation plan and approach should be a component of the call for bids until such time that global framework is developed and implemented. Evidentiary requirements for compensation must also be considered in the development of the compensation regime. As was well described in the report, many fisheries are data-challenged and the provision of evidence to support allocation of compensation is expected to be difficult. This challenge should be acknowledged in the recommendation.</p>	<p>The Committee has recommended (T4-2) that on the identification of a WEA(s), effort be undertaken to more precisely define fishing activities and that a compensation guideline be developed by the Fisheries Working Group (T4-4).</p>
189	<p>T4-2: The development of a compensation guidelines based on the principles set out in T4-2(a) to T4-2(g).</p> <p>We generally agree with the development of guidance but caution again on the narrow scope and encourage fulsome discussion before implementing this recommendation as written. This compensation regime is focused only on those direct impacts to the act of fishing and again ignores the indirect risks associated with offshore wind development. We feel that the inclusion of these indirect pieces is integral to successful coexistence.</p>	<p>It will take time to create any compensation framework or guideline for Nova Scotia. In the event a call for bids and the issuance of a Submerged Land License precedes the development of such, it is suggested that the issue of how fisheries compensation will be regulated will need to be clear prior to any proponent's Final Investment Decision and/or regulatory approval to commence construction of an offshore wind farm.</p>
190	<p>T4-3: The establishment of an industry wide funding model based on equitable distribution of liability among OSW leaseholders. This recommendation aligns with a long-held request from the fishing industry. Given the novelty of offshore wind and the uncertainty of how/if cumulative effects may arise, the establishment of a royalty-funded reserve to address these unforeseen impacts will provide the necessary assurances that harvesters and their livelihoods will be protected. We do note that other similar funds established in more mature offshore wind development regions have experienced challenges with access driven by the administrative structure of the governing body. We encourage language in this recommendation to identify a lessons-learned approach to ensure that such funds can be readily accessed if/when the need arises.</p>	<p>Noted. In response to the administrative structure please refer to recommendation T2 (section 10).</p>

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191	<p>T4-4: The establishment of participation funding to support fishers in implementing these recommendations.</p> <p>The introduction of offshore wind energy has already required the harvesting sector to increase capacity to ensure effective engagement with regulators and proponents. This has created new demand on staff already over-taxed by day-to-day operations, regulatory processes and keeping their enterprises viable.</p> <p>Looking forward, staff time required to engage with the offshore wind industry, the regulators that govern their activity and the government that is supporting this new industry, is sure to rise. In essence, the introduction of this new industry has created a significant financial burden.</p> <p>Given the recommendations of the RAC will require heightened involvement of the fishing industry to achieve this long-term goal of co-existence with the offshore wind industry, it is appropriate that some funding be provided to help support engagement. Without these supports, decisions may be made without the input of the most impacted stakeholder – the harvester.</p>	Noted.
192	<p>T5-1: Recognize that responsibility for cumulative effects is shared and tiered.</p> <p>The fishing industry appreciates and strongly agrees with this recommendation. We do note that this recommendation ties tightly with the recommendation for data collection (T1-6) and suggest that both recommendations should include specific wording speaking to the necessity of gathering baseline information to evaluate if cumulative impacts are being observed and to help apportion liability as determined.</p>	Acknowledged.
193	<p>T5-2: Prepare guidelines and data sources for developers.</p> <p>The fishing industry generally agrees with this recommendation. We note that the framework for cumulative effects assessment seems loose and inconsistent across impact assessments. Clear guidance will provide a consistent approach and support comparability across programs.</p> <p>We suggest that the development of the guidance be done in a consultative fashion that includes the fishing industry and other stakeholders in its development such that key ecosystem components can be readily identified and included in future assessments.</p>	Guidance around a framework for cumulative effects guidance will fall under recommendation T1-1.
194	<p>T6-1: CNSOER to prepare the best practice guidelines and guidance documents for the OSW industry.</p> <p>We agree with the nature of this recommendation but are concerned that the language suggests a heavy reliance on experience in other jurisdictions. We continue to believe that while there are lessons that can be gained from experience in other jurisdictions, successful co-existence will be based on a “made in Nova Scotia” approach built on the shoulders of others.</p>	Noted.
195	<p>T6-3: Recommend that project-specific impact assessments for OSW projects are required.</p> <p>We strongly agree with this recommendation. We encourage the RAC to extend this recommendation</p>	Federal impact assessments under <i>the Impact Assessment Act</i> are triggered for 10 or more turbines as per the regulations. See section 1.3 for more information.

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	to include any offshore wind project, irrespective of size and whether that project is in the jointly managed waters or those under provincial jurisdiction.	
196	<p>T6-4: Consider requiring all vessels to have an approved vessel tracking system installed and operating while in the RA Study Area.</p> <p>We recognize that the use of vessel tracking systems will help to inform spatial usage by the harvesting sector and note that many fleets and sectors have utilized this technology for years, while other sectors do not have a mandatory requirement for use, thus creating a patchwork of implementation. It must be noted that any mandatory implementation measures will force harvesters to incur the cost associated with these systems. Again, this becomes yet another additional cost for harvesters as a direct result of offshore wind development.</p> <p>This recommendation also ignores other important factors influencing the interest of individual fleets/sectors to use vessel monitoring systems. Many harvesters are concerned that using publicly accessible vessel tracking systems will result in additional effort in their fishing area and over-exploitation of local fishing areas.</p> <p>We also note that the use of mandatory vessel tracking systems are a component of DFOs catch monitoring system, which also includes many other reporting steps. For this reason, the necessity of mandatory vessel monitoring systems should be viewed in the context of global catch monitoring as opposed to being undertaken in advance of a possible future industrial use of shared ocean space.</p> <p>To account for this hesitation and to encourage greater uptake within the harvesting sector, we suggest that participation in this recommendation be made voluntary with explicit reference to supporting funds being provided to those harvesters to help support their adoption and utilization of these vessel tracking systems.</p>	Modifications have been made to section 10.

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197	<p>T6-5: DFO to review their management and regulatory processes.</p> <p>We understand that there is a need for DFO to review their processes and regulations to accommodate this novel use of the marine environment, however we are confused at what the extent and scope of this review would be.</p> <p>For example, offshore wind energy is only one of many spatial pressures being exerted on the harvesting sector. Similar to other jurisdictions, Canada is pursuing the establishment of extensive marine conservation reserves that, by their very definition, will bar some sectors from fishing. Thus, we have pressure being applied by two different departments of the same government that are steadily eroding the available space for harvest.</p> <p>We would suggest that such a review of the management and regulatory processes should include a clear review of all the pressures currently being placed on the harvesting sector and see a strong linkage between this work and the whole of region approach recommended under T1-6.</p> <p>In addition, we suggest that this review should include the development of a framework to allow the impacts of offshore wind development on the marine resources to be separated from those caused by climate change.</p> <p>Clear inclusion of these pieces in the recommendation would strengthen the review of DFOs regulatory and management processes.</p>	This recommendation has been clarified.
198	Replace “GBA+” with GBA Plus. GBA Plus is the proper and most up-to date acronym for Gender-Based Analysis Plus (Acronyms and Abbreviations pg. 3 and throughout the report).	This modification has been made throughout report.
199	Consider adding the following (in red) : "Not only are the data pertaining to the GBA Plus problems fragmented, but there is no single source responsible for its collection. It is important to include qualitative and quantitative data, as well as Indigenous Knowledges and non-Western knowledges, and to consult multiple source and engage with groups and communities to fill in these gaps." It is important to use diverse data sources, including community level analysis, to address data gaps. To support GBA Plus application to develop baseline data and conditions to monitor and evaluate results.	Noted.
200	MRC recommends that following the publication of the RA final report, provincial and federal governments work with relevant associations and organizations to help support a sustained education and outreach effort about OSW.	Acknowledged, see amendment to text in T7-1.

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201	<p>T1-1: The Draft Report identifies data gaps and items potentially requiring more research to help inform future project planning and regulatory decision-making. MRC agrees that filling data gaps and building the knowledge around OSW activities and potential impacts is critical to ensuring the responsible and sustainable development of OSW and an overall industry. Furthermore, it is imperative that the pursuit of additional studies, does not delay any development activities (pre-development activity, call for bids, etc.). Studies can take place in parallel with planning and development activities given the long timelines for OSW development. A general principle should be that future studies must support and not inhibit growth and progress. Overall, MRC is supportive of the recommendations included in Theme 1. The need for a collaborative and coordinated effort to address research gaps is recognized and an effort like the Scotian Shelf Collaborative Research Initiative as recommended in T1-1 would help drive and facilitate critical research. It should be noted that an effort is already underway by Town of Port Hawkesbury and the Municipality of the County of Richmond to develop an Offshore Wind Centre of Excellence (OSWCoE) Business Case and Opportunities Appraisal. As part of its remit the OSWCoE will fulfill the role bringing OSW related research in Atlantic Canada under one umbrella, which seems to be aligned with the Scotian Shelf Collaborative Research Initiative detailed by the Committee.</p>	Noted.
202	<p>T2-1 Establish a Port Advisory Group As the Draft Report correctly details, there are several initiatives and studies underway and some already completed to assess existing port capabilities and future needs to support OSW development. Before adopting the recommendation of a Port Advisory Group, MRC recommends reviewing the results of the studies and any recommendations put forward that may either conflict or bolster this recommendation.</p>	Noted.
203	<p>T2-2 Undertake Class D (conceptual design) cost estimate and model impacts MRC believes that a deeper economic impact study, assessing the impacts of OSW development scenarios in Nova Scotia would help to fill an information gap and provide useful insight for the public, stakeholders, elected officials, etc. MRC's Atlantic Wind Energy Supply Chain Assessment slated to be finalized in March 2025 will provide some of this information.</p>	Noted.
204	<p>T2-3 Adopt a regional/national planning approach for the provincial OSW Roadmap The Draft Report underscores the need for a regional and national approach to planning to ensure an adequate supply chain and workforce to meet the demands of OSW development. A supply chain assessment, along with recommendations for supply chain development, commissioned by MRC, will serve as a critical study to guide future efforts in supply chain growth and readiness. A summary of the study's scope of work and tasks is attached as an appendix to this submission.</p>	Noted.
205	<p>T3-1 Coastal Buffer MRC recognizes the work that went towards reevaluating the buffer proposed in the Interim Report and</p>	Noted.

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	<p>the acknowledgement by the Committee that the sector, technology and potential constraints are evolving. As a result of this analysis, the Committee has proposed a buffer could potentially undergo a request for an incursion or modification.</p> <p>While the Committee has outlined rationale for the 25 km buffer, outlining constraints that were identified during the engagement and information-gathering process, the rationale still lacks specific science-based evidence that a blanket coastal buffer of 25 km is necessary. MRC believes that potential risks and/or negative impacts to fisheries, the environment, other ocean users and coastal communities must be mitigated and addressed early, however, the analysis fails to also recognize how much of an impact distance from shore can have for the economics of an OSW project. Every additional kilometer from shore has an economic consequence for projects, investment attraction, and the overall sustainability of a project and the sector. At this early stage in establishing an OSW industry, MRC recommends that rather than applying a coastal buffer that could then potentially undergo a request for incursion or modification, that the application of buffers be based on the following criteria:</p> <ul style="list-style-type: none"> • Determined on a project-by-project basis and unique characteristics of a proposed project (ex. location, type of OSW technology, size of project, etc.) • Consideration of existing constraints and regulatory requirements to avoid duplication and minimize overly burdensome regulation • Consideration of international best practices for establishing buffers • Determination of buffer distance based on science-based, transparent process that also includes assessment of impact on OSW project economics • If a blanket coastal buffer is viewed as a critical need, determination of the buffer distance and specific details should go through a focused consultation process with relevant parties including the OSW industry 	

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206	<p>T3-2 Tier1 and Tier2 PDAs</p> <p>As shallower areas (60 metres or less) are suitable for fixed OSW technologies, possibly presenting lower project costs (dependent on distance from land), further exploration and analysis of these shallower areas is encouraged, with the aim of maximizing the potential of these areas by possibly expanding them further.</p> <p>The rationale for establishing Tier 1 and Tier 2 PDAs appears to be a practical way of supporting future policy and regulatory decisions, but some members have raised questions of whether it is necessary to categorize areas into two tiers given that industry/developers would be conducting extensive studies and data collection to determine best sites. It is recognized that this categorization is intended to assist future decision-making and identification of specific sites.</p> <p>However, given that governments will engage in additional efforts to determine future Wind Energy Areas following the completion of the RA, the tiers may not be necessary at this time.</p>	Noted.
207	<p>T3-3 Bid Criteria</p> <p>The discussion on bid criteria included in the Draft Report is helpful and aligns with feedback MRC has received from its members over the years. However, including this information does seem somewhat out of scope in relation to the RA Terms of Reference and its stated objectives.</p> <p>MRC recommends that government pursue further analysis and discussions with OSW industry on auction/leasing design and bid criteria to determine the best course of action and elements that are suitable for the unique aspects of the Nova Scotia market.</p> <p>To support work to design an appropriate and balanced auction/leasing approach, MRC collaborated with Canada's Ocean Supercluster and several of its OSW developer members to commission a report focused on how seabed leasing rounds for offshore wind projects may be structured, designed and implemented for the Canadian market. There is growing awareness across markets that seabed leasing (and auction) processes can significantly influence industry direction. The aim of this report is, therefore, to make recommendations as to how to maximize this opportunity to use the leasing round as a mechanism to positively shape the industry as it matures in Canada, and conversely, ensure pitfalls that have been highlighted in other jurisdictions are avoided.</p>	Noted.

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208	<p>T3-5 Security Related to Abandonment and Decommissioning MRC supports the need to establish proper protocols and requirements related to abandonment and decommissioning of OSW projects and technologies and agrees with the Committee’s recommendation that the “process used to establish the level and type of decommissioning and abandonment security for OSW projects be transparent and that the public be advised of the arrangements put in place.” MRC further recommends that careful consideration go towards the level of security required, balancing the realities of decommissioning costs to ensure this requirement does not inadvertently negatively impact the economics of the project. The Draft Report references feedback on this topic included references of concerns about abandoned tidal energy devices in the Bay of Fundy. MRC believes that it is important to outline that tidal energy devices vary greatly from OSW technologies and that there can be considerable differences in the requirements/methods for decommissioning and removal of OSW versus tidal technologies. As a more mature technology, there are more documented practices for the responsible removal of OSW projects and technologies.</p>	Acknowledged, see description in T3-5.
209	<p>T3-6 Potential reduction of existing pipeline corridor exclusion zone The Draft Report states that there is a 5NM exclusion zone to protect the abandoned but existing pipeline corridor, but MRC members have pointed out that this is false. The final abandoned pipeline locations (for both Deep Panuke and Sable Offshore Energy Project) were provided to CHS and locations charted with a note that they are abandoned. No exclusion zone is noted. MRC recommends that this portion of the report be removed or verified with CHS.</p>	The exclusion zone could not be confirmed. The recommendation has been removed.
210	<p>T4-1 Establishment of a Compensation Regime, T4-2 Development of a Compensation Guideline MRC is supportive of actions to foster co-existence and recognition of displacement of fisheries activities or loss of livelihood. At this early stage in establishing an OSW industry, MRC recommends that rather than establishing a compensation regime or guideline at this stage, that further discussions take place between government and OSW and fisheries industries to establish protocols and guidelines for how fisheries and OSW can co-exist in the marine environment. A future step would then be to explore and pursue compensation models and practices.</p>	Noted.
211	<p>T4-3 Establishment of Industry-wide Funding Model MRC views this recommendation to be out of scope with the RA Terms of Reference and associated objectives. Before any establishment of an industry-wide funding model, MRC recommends that there is extensive collaboration and discussions between government and OSW and fisheries industries.</p>	<p>MRC’s view that the topic of a fisheries compensation scheme and how it is funded is outside the Committee’s TOR is noted. The Report suggests that all topics around an appropriate compensation scheme, including how the model is funded, would be discussed within the Fisheries Working Group. See all the recommendations in T-4.</p>

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212	<p>Theme 6: Governance (p. 339 – 342) MRC is supportive of actions recommended to foster good governance of OSW and in particular, encourages federal and provincial government to pursue the recommendation to include “First Nation Representation on the CNSOER Board” as detailed in T6-2.</p>	Noted.
213	<p>T7-1 Work with schools, colleges and universities to develop educational and training programs related to OSW MRC is supportive of actions to foster greater education and training related to OSW skills, expertise and knowledge that can address increasing needs for a skilled workforce. MRC recommends that more emphasis be put on co-op and internship placements with local suppliers and OSW industry as an opportunity and action to support skills development and build the local workforce.</p>	Wording on co-operative (co-op) education and training opportunities added.
214	<p>T7-2 Development of new upskilling, retraining and micro-credential programs for current marine workforce Recommendation T7-2 should be built upon further by provincial and federal governments in consultation and collaboration with MRC as the association is already supporting local suppliers involvement in OSW domestically and internationally. MRC recommends that governments explore and support the establishment of a supplier development program for OSW that focuses on strengthening the capabilities and performance of suppliers by providing targeted support, training, and collaboration. Key components may include capacity building for local suppliers, technical assistance to meet stringent industry standards, and facilitating access to funding or financing options for innovation and scaling. The program could also emphasize improving supply chain resilience through better logistics, quality control, and risk management practices. Collaboration with research institutions, universities, and industry experts to drive technological advancements and sustainability improvements would be crucial. Additionally, fostering long-term relationships between OSW developers and suppliers, alongside promoting knowledge sharing and best practices, could ensure that the entire supply chain is better equipped to meet the growing demands of the offshore wind industry, while driving local economic growth and job creation.</p>	Acknowledged, see amendment to text in T7-2.

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215	<p>The next issue focused on Recommendation 10.4 Theme 4 - p335, in particular the T4-1 phrase "However, the principle of providing some level of compensation in the absence of a legal obligation is increasingly acknowledged and supported in OSW jurisdictions, and it is a principle which the Committee endorses." The words "some level of compensation" are ambiguous and open for conjecture.</p> <ul style="list-style-type: none"> • While the Draft Report October 2024 indicated that the OSW industry supports, in principle, commercial fisheries compensation, the absence of specifics of process and reference to an annual \$3 billion Nova Scotia fishery, it does not tangibly indicate what that support may be. • The unintended consequences of an estimated 3,000 offshore windmills potentially displacing a \$3 billion annual commercial fishery are absent from the report. 	Removed the word "some" from this recommendation.
216	Concerns exist on how decisions/recommendations by the Canada-Nova Scotia Offshore Energy Regulator (CNSOER) will directly or indirectly impact the \$3 billion Nova Scotia fishery.	Noted.
217	<p>The implication of establishing a commercial fishery compensation process is that it potentially can be used to exonerate OSW displacing fisheries while shifting accountability to the fishery to:</p> <ol style="list-style-type: none"> 1. establish a claim, 2. qualify and quantify damages, and 3. try and negotiate "some" compensation. 	Noted.
218	<p>Questions exist as to why the RA has not recommended a fisheries expert be appointed to the CNSOER.</p> <p>Little reference to commercial fisheries and the absence of fisheries scientific participation on the CNSOER clearly indicates a bias of governance in support of OSW while largely silent in recognizing the significance of the commercial fisheries.</p> <p>It remains astonishing as to why the Draft Report October 2024 did not identify this bewildering omission and recommend a means to ameliorate it. There is also concern as to why the Draft Report October 2024 has not recommended the CNSOER have a list of fishery scientific experts (i.e. former DFO Regional Directors of Science) to respond to pertinent science-based fishery issues.</p>	The CNSOPB already has fisheries representation through the Fisheries Advisory Council. The mandate of the CNSOER including process around expert advice is outside the mandate of the Committee.
219	<p>Concerns exist that the CNSOER may rely on an ad hoc OSW access and allocation process in the absence of a formal access and allocation policy framework, while at the same time relying on a compensation scheme to resolve (sort out) potential conflicts.</p> <p>The creation and management of a fishery compensation mechanism must directly involve interests from the offshore Nova Scotia commercial fishery.</p>	Recommendation in the report notes that fisheries are involved throughout the process.

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220	The Draft Report October 2024, does not contain a strong argument for a comprehensive independent social-economic analysis of OSW across the Scotian Shelf. While the report does reference the completion of a localized social economic report relating to the Eastern Scotian Shelf, there is a lack of compelling language for an across-the-board independent social economic assessment.	Without an understanding of the scale of the industry it is difficult to be detailed at this stage. The Committee expects there will be more work to be done building on the RA (e.g., when wind energy areas are identified, pathways to market have been identified, community profiles completed etc.).
221	The Draft Report October 2024's suggestions for a full "Environmental Impact Assessment", (EIA) are also notably understated, particularly given that there are no legislated provisions guaranteeing protections from government exemptions.	Noted.
222	Should a policy of "no displacement of an existing natural renewable resource by any new resources" not occur then the Federal and Provincial governments need to direct the CNSOER to implement a comprehensive policy framework of access, allocations and adjacency regarding OSW locations, and operations. This policy initiative should occur simultaneously while developing a comprehensive compensation mechanism directly relating to potential OSW displacement of commercial fisheries. A compensation process should not be used as a systematic default mechanism in lieu of displacement of fisheries.	Noted.
223	There is an urgent requirement to establish a separate offshore commercial fisheries board to directly advise the CNSOER in providing a balanced OSW access approach and minimize OSW superseding existing fishery access. Considering that CNSOER decisions on OSW will negatively impact offshore commercial fisheries, an offshore commercial fishery representative should be appointed to the CNSOER. The CNSOER should also consider having an identified reference index of independent fisheries scientific experts to provide additional support to the Board.	There is currently a Fisheries Advisory Council (FAC) that reports to the CNSOPB (CNSOER). The FAC includes representatives from various fishing groups, the DFO, NRCan, NS Department of Fisheries and Aquaculture, and NRR. FAC members provide advice and suggestions for consideration in activity authorization applications, guideline input etc.
224	Before OSW access is considered, it is recommended that more explicit rationales be provided in support of an independent comprehensive "Social-Economic Impact Analysis" and an "Environmental Impact Assessment"	Noted.
225	Given the initial tier 1 OSW will directly impact WT. Grover Fisheries Ltd. and Ocean Pride Fisheries Ltd., sea cucumber fisheries, it is essential these two companies participate in the development of a policy framework of access, allocations, and adjacency with the CNSOER including any compensation policies and processes.	Engagement with fisheries on a project level will be part of the impact assessment process.

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226	We support the transition to renewable energy and acknowledge the positive role offshore wind energy can play in reducing greenhouse gas emissions, contributing to Nova Scotia’s climate goals, and moving towards a low-carbon energy system. However, this needs to be done in a way that maximizes community benefits, including access to that energy by communities to reduce emissions and energy costs, providing job opportunities in communities adjacent to wind farms that are reflective of the Gender Based Analysis Plus (GBA+) assessment, meaningful and equitable financial benefits that prioritize communities over industry profits, and partnership/ownership opportunities for communities where relevant and desired. The development of renewable energy must be paired with stringent environmental protections.	Noted.
227	We recommend that the Committee continue to engage with the fishing industry to ensure that offshore wind developments do not negatively impact commercial fishing grounds and the livelihoods of commercial fishers, particularly for stocks that are in the Critical Zone of DFO’s Precautionary Approach Framework. We recommend that the Committee include a table that shows the stock and its status within DFO PA Framework as a point of reference within the draft report.	The Committee's work is complete with the submission of the final report in January 2025. Continued engagement is expected to occur as an outcome of the Regional Assessment and as planning for the new industry occurs. Fisheries data will continue to inform the engagement.
228	Detecting potential changes in marine mammal occurrence due to offshore wind is further complicated by the effects of climate change, which are likely to induce shifts in spatio-temporal distribution. One of the keys to circumvent these challenges is to conduct baseline studies with sufficient duration to capture the (presumably increasing) natural variability in oceanographic conditions and associated responses by marine mammals. We suggest a minimum of three years, and preferably up to five, to provide a comprehensive understanding of marine mammals’ habitat use on the Scotian Shelf. With construction of any approved project not expected to begin before 2031, there is ample time to do things right.	Noted. The details of such baseline programs would be part of the SSCRI (see recommendation T1-1).
229	We strongly support section T1-6 in the regional assessment, specifically “the development of a multi-year plan to increase the knowledge of marine mammal behaviour and habitat use in the RA Study Area”. Although PAM can tell us when a species is present, it is difficult to assess the residency of individual whales without dedicated visual monitoring. This information is critical to evaluate the potential effects of offshore wind development. Indeed, the determination of persistent occurrence in an area based on PAM may originate from numerous individuals transiting through the area or a handful of animals with extended residency. Both scenarios have very different consequences for the individuals and populations involved.	Sentence on visual monitoring has been added to T1-6.

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230	We believe that dedicated vessel-based efforts to better understand species composition, abundance, distribution, and habitat use are critical for filling current knowledge gaps and supporting sustainable, responsible wind energy development in Nova Scotia. While PAM is invaluable in assessing species presence when aerial or boat-based surveys are not possible (e.g. nighttime, winter), non-vocalizing animals cannot be detected. Baleen whales show pronounced seasonal variations in vocal behavior, with low calling rates in spring and summer when construction activities may be concentrated. We therefore strongly encourage any regulating agencies, be it the CNSOER or a Scotian Shelf Collaborative Research Initiative (SSCRI), to provide the funding needed to support research efforts required to properly assess offshore wind development in Nova Scotia.	Noted.
231	Recommendation 5 (T1-5) - In reference to section 10.1 (Page 321) recommendation T1-5, we 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.	Noted.
232	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.	Updated recommendation T1-6.
233	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	Addressed in T3-3 (coexistence) and T1-7. There should be ongoing discussions around coexistence opportunities but will be determined by the design of a project. The fishing industry will need to identify and quantify gear types.

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	<p>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.</p> <p>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.</p>	
234	<p>Theme 6: Governance</p> <p>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.</p>	Acknowledged.

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235	<p>Theme 7: Education and Training</p> <p>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.</p> <p>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.</p>	Added to recommendation T7-2.
236	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.	Included in Recommendation T1-6.
237	<p>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.</p>	The Committee acknowledges that a test site could be an option to explore further. This will be dependent on time and costs and encourages cooperation with the countries that have sites already under development which can provide valuable information in a shorter timeframe and at a lower cost.
238	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	Noted.

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	implement each article, the Draft Assessment should make clear reference to UNDRIP, and specifically FPIC.	
239	<p>Strongly advises that the Committee include in their final report a recommendation that once the amended Accord Acts are brought into force:</p> <ol style="list-style-type: none"> 1. The responsible federal and provincial Ministers issue a joint direction to the Offshore Energy Regulator for Nova Scotia to prohibit issuance of submerged land licenses in MPAs and OECMS, and 2. That the Governor in Council create a regulation under the amended Accord Act to prohibit offshore wind development in existing and future MPAs and OECMS. 	Noted. Refer to sections 4.4 and 6.6, which address MPAs and selection of PDAs.
240	All protected areas and areas of interest that are counted towards Canada’s marine conservation targets must be free from all industrial activities, including offshore renewable energy development and exploration.	Noted. Refer to sections 4.4 and 6.6, which address MPAs and selection of PDAs.
241	<p>Urges the Committee to apply the precautionary principle to ensure that future legally protected and conserved areas – including those that are in the process of designation– are explicitly scoped out of areas considered for OSW. We note that the Committee has not provided any recommendations with respect to how the OSW regulatory regime can or should address future proposed protected areas, and it is critical that regulators, proponents, Indigenous nations, the public and other stakeholders have certainty with respect to which offshore areas will be closed to future bids for OSW development. Recommends that the Committee be explicit that OSW development must not be allowed in future legally protected and conserved areas. This means that if a future site is identified for protection, new and existing interests in OSW will be prohibited or cancelled, respectively. We reiterate our recommendation that the responsible Ministers and the GiC take appropriate actions under the amended Accord Act once it has the force of law.</p>	Noted. Refer to sections 4.4 and 6.6, which address MPAs and selection of PDAs.

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242	<p>The amended Accord Acts do not extend the existing protections in Sable Island and Georges Bank to ORE projects. In other words, ORE projects would be allowed in both offshore areas.</p> <p>Sable Island is a National Park Reserve with outstanding Mi'kmaq rights claims. It contains one of the last wild herds of horses in the world and largest breeding colony of grey seals. One of the defining features of Sable Island's management plan is the need to work collaboratively with Mi'kmaq and the public to better understand the island and use evidence-based decision-making to protect the island. A precautionary approach warrants further protection against existing and emerging activities while that work is being undertaken.</p> <p>Georges Bank is known to have a very productive ecosystem, serving as an important nursery ground for juvenile cod and haddock and acting as a migratory corridor for the North Atlantic Right Whale. It also supports multiple lucrative fisheries. The part of Georges Bank that is in American jurisdiction is now protected as the Northeast Canyons and Seamounts Marine National Monument, which restricts petroleum, mining and fishing activities.</p> <p>We reiterate that specific and binding language articulating that OSW development is prohibited in protected areas would help to ensure that areas such as Sable Island and Georges Bank remain protected from the cumulative negative effects that a disturbance of these vital ecosystems would provoke.</p>	<p>The Committee cannot issue "direct and binding" language, however it is acknowledged in the report that MPAs are protected areas under federal legislation (e.g., <i>Oceans Act</i>) to conserve the natural environment for the long term, protecting not just one single species, but the ecosystem as a whole. As such, PDAs were selected to avoid MPAs as per the restrictions for these areas around industrial activities (refer to section 6). Further, the Committee's constraint analysis notes that due to protected status or designation several areas were excluded from consideration for OSW development at this time (e.g., MPAs, Critical Habitat, National Park Reserves, Marine Bird Sanctuaries etc.) (refer to section 6.2).</p>
243	<p>Recommends that the Committee leverage and recommend the use of new environmental protection provisions in the amended Accord Acts to proactively safeguard existing and future MPAs from adverse impacts of OSW development, which will pave the way for a more sustainable and forward-thinking approach to OSW development.</p>	<p>It is outside the mandate of the Committee to influence the amendments to the Accord Acts.</p>
244	<p>We recognize the extensive work of the RA Committee to date. We acknowledge that the latest draft report is a good starting point to the much-needed analyses of potential impacts to NS's long standing, renewable resource based, seafood industry. However, at this stage, the nature of the report is macro in scale with respect to capturing the intricacies of various fishing businesses and operations occurring in the waters off NS. We stress that project-specific impact assessments, informed by extensive consultations with the fishing industry, must occur for all potential future offshore wind projects.</p> <p>As specific areas are considered by potential wind energy proponents, direct input from the fishing industry will be critical to properly assess suitability for development and potential impacts to the fishing industry. This assessment is crucial, as it will underpin the development of avoidance and mitigation measures, as well as compensation options for instances where avoidance and mitigation are not sufficient in preventing negative impacts to the fishing industry.</p>	<p>Noted. The intent of the RA Report was broad and high level at this early stage. Impact assessments will address impacts at a project level and determine site specific mitigation and monitoring programs.</p>

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245	We encourage the Committee to prioritize recommendations that: a) Highlight the importance of developing and upgrading port infrastructure to meet the needs of offshore wind projects. The Strait of Canso is well-equipped to support these activities and could serve as a hub for transportation, assembly, and maintenance operations. b) Ensure meaningful engagement with local communities, stakeholders, and industry leaders within the region to maximize economic benefits and mitigate potential disruptions to existing marine and industrial activities. c) Promote investments in workforce training and development programs tailored to the offshore wind industry, fostering local employment opportunities and long-term economic sustainability in the Strait of Canso area.	Noted. The Committee has made recommendations to the Ministers on prioritization of recommendations.
246	Recommend the creation of a development exclusion zone around the Maritime Link submarine cables (details to be determined through further engagement).	Mention to Maritime Link has been added in table 6.3.
247	Recommend that any future activities related to offshore wind development include appropriate warnings about the risks of contact with and disruption to submarine cables in general, and the Maritime Link submarine cables in particular, and make provisions to prohibit and mitigate contact with the submarine cables including through the recommended exclusion zone	Mention to Maritime Link has been added in table 6.3.
248	Given the important role of stakeholder, fisher, and indigenous engagement and the need for sound science during the project development stage, we fully support the Committee's recommendations around participant funding and engagement. This includes support for intervenor funding, funding for Mi'kmaq organizations and for Mi'kmaw Ecological Studies, establishing the Scotian Shelf Collaborative Research Initiative and open discussions among marine users more generally including in Maine and New England broadly.	Noted.
249	An important consideration for the RA, and particularly around the Sydney Bight, is the need to clearly mark the location of the Maritime Link HVDC cables as an "exclusion zone" on any proposed licence area. Interference with the ML transmission line during construction, development and operations of offshore renewable energy projects must be avoided in order to protect and ensure shared safety and the reliability of this critical infrastructure. ENL has provided a stand-alone submission to the Committee which provides additional information on this critical safety consideration.	Mention to Maritime Link has been added in table 6.3

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250	<p>As the Committee finalizes its recommendations, it is important to reinforce that regulatory processes that may flow from the RA must be timely, predictable and efficient in order for offshore wind development to proceed. Recent studies have shown that unfortunately Canada is now lagging globally when it comes to efficiency in project permitting on energy and natural resources projects. As noted in the Canada Electricity Advisory Council (CEAC: 2024) report, the World Bank for example has ranked Canada as one of the slowest jurisdictions for permitting, performing 36th out of 38 countries. The CEAC(2024) further highlights the need for significant regulatory reform in order for Canada to meet decarbonization policy targets:</p> <p>“Current regulatory frameworks, designed to safeguard against environmental harm, are paradoxically stalling the clean energy projects that are necessary to decarbonize the economy and mitigate the worst impacts of climate change. Addressing climate change demands pragmatic flexibility. The Council has determined that the urgency of climate change and the associated global economic transition requires a recalibration of Canada’s priorities that accounts for the critical role of clean electricity.”</p> <p>One of the Council’s four cornerstones captures the need for urgency in developing renewable projects:</p> <p>“Speed: To achieve its goals, Canada needs to rapidly expand its clean electricity infrastructure. That simply will not happen without measures designed to attract capital, involve Indigenous Nations and communities, and, critically, recalibrate project review and approval processes across the country and at every level of government to enable more clean electricity.”</p> <p>Insofar as the regional assessment will provide a basis for regulators and policy makers to make decisions, we encourage the Committee to consider the CEAC’s observation that regulatory approval processes need to be recalibrated to enable more clean electricity.</p>	<p>The decision around accepting and implementation of the recommendations lies with the Minister.</p>
251	<p>The opportunity for the SEA recommendations to help enable efficient and timely regulatory permitting decisions in the future</p>	<p>Noted.</p>

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252	<p>Recommendation T1-1: Develop a Scotian Shelf Collaborative Research Initiative Net Zero Atlantic agrees that effective development of OSW in the region requires a convening function that:</p> <ul style="list-style-type: none"> • articulates research priorities, • ensures collaboration among stakeholders and users of the marine environment, • promotes sharing and dissemination of results, and • facilitates the involvement of necessary expertise in the research and/or its oversight. <p>Building on this momentum, Net Zero Atlantic will release a synopsis report summarizing key insights from the R&D Forum and proposing actionable recommendations. This report will contribute to the collaborative roadmap for advancing OSW in Nova Scotia and will be available in early 2025.</p> <p>Based on our experience in this field, we also agree with the RA Committee that stable, multiyear funding is necessary to support and maintain the convening function. To minimize overhead and administration costs, while leveraging existing capacity, networks, and experience, we recommend funding an organization active in this space to take on the convening function. Net Zero Atlantic hopes to be considered for this role.</p>	Noted.
253	<p>Recommendation T1-2: Fund Mi'kmaq Ecological Knowledge Studies (MEKS)</p> <p>Net Zero Atlantic fully endorses the RA's recommendation to fund MEKS and wants to highlight the importance of sustained support for this work. Based on our experience partnering with the Unama'ki Institute of Natural Resources (UINR) and the Confederacy of Mainland Mi'kmaq (CMM) in the OSW space, we recommend providing funding to both organizations for permanent, dedicated positions. These roles would ensure long-term capacity to conduct MEKS and facilitate meaningful broad participation in OSW development.</p>	The Committee has chosen not to recommend a specific organization as it is aware of bottlenecks in this space.
254	<p>Recommendation T1-3: Create a shared repository of data and sources</p> <p>Net Zero Atlantic agrees with the recommendation to establish a shared repository of research, with the Canada-Nova Scotia Offshore Energy Regulator (CNSOER) serving as the central holder of the database. Net Zero Atlantic's "Atlantic Canada Offshore Wind Grid Integration and Transmission Study" is already creating a foundational database that could contribute to this effort. This database for the Atlantic Region is being developed with input from CNSOER, so that future data management efforts can be made easier.</p>	Noted.
255	<p>Recommendation T1-7: Open discussions with the State of Maine</p> <p>Net Zero Atlantic supports the RA's recommendation for actively engaging in conversations with our counterparts in Maine and suggests expanding collaboration to include other New England states. Collaborative research on environmental, technical, and economic issues would benefit both regions as we move from referencing work completed in dissimilar jurisdictions to deepening our understanding of our specific systems. Net Zero Atlantic's CEO, Alisdair McLean, recently visited</p>	Noted. See additional reference to Scotland's OSW project included in T1-7.

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	Portland, Maine and Boston to explore opportunities for interregional collaboration, underscoring our commitment to developing cross-border partnerships.	
256	<p>Recommendation T2-1: Establish a Port Advisory Group</p> <p>Net Zero Atlantic agrees with the recommendation to create an OSW Port Coordination Group. We recommend that Net Zero Atlantic’s project, “Assessment of Atlantic Canadian Ports to Support Offshore Wind Development” serve as the foundation for the group. The project’s scope includes initiating each of the five recommended actions, with an EOI, cost estimates for each port at AACE International class 5 standard, recommendations regarding the capability of port infrastructure to support the region’s offshore wind goals, and considerations for potential investment strategies for the region. The project management committee includes representatives from the OSW industry and could be expanded to include additional experts and stakeholders. The group could use the project’s report, expected mid-year 2025, as a starting point for developing specific investment plans and securing required financing.</p>	Acknowledged. The Net-Zero Atlantic report is referenced in recommendation T2-1.
257	<p>Recommendation T2-4: Initiate socio-economic studies for key communities</p> <p>Net Zero Atlantic agrees with the RA Committee that research should start to understand the socio-economic impacts of OSW on key communities. Through over 70 workshops in Indigenous and non-Indigenous communities, Net Zero Atlantic has heard that socioeconomic impacts are a top priority for both Indigenous and non-Indigenous communities. We appreciate the Committee’s reference to the engagement program we have underway with CMM, UINR and Cape Breton Partnership, and we’re ready to extend it as recommended.</p>	Noted.
258	We recommend that the RA Committee add an “Electric Grid” box to Figure 10.2 to emphasize that the grid is as important as “Ports”, “Supply Chain” and “Labour”.	Added to figure 10.2.
259	<p>Recommendation T3-1: Establish a 25 km coastal buffer zone</p> <p>While Net Zero Atlantic supports the establishment of a coastal buffer zone in the absence of project-specific solutions, we have two recommendations:</p> <p>(1) We recommend that Nova Scotia performs a sensitivity analysis to assess the impacts of varying the buffer distance (e.g., 10 km – 25 km). This analysis should evaluate how different buffer distances could affect the size of the Potential Development Areas (PDAs), providing a clearer understanding of trade-offs and opportunities. (2) The report would benefit from a table that details the available area for each PDA based on varying water depths (e.g., 0-60 meters, 60-70 meters, and 70-80 meters). This information is helpful for understanding the bathymetry of the PDAs and would provide stakeholders with a clearer picture of development potential for fixed-bottom turbines.</p>	Acknowledged. The Committee assumes a sensitivity analysis will be provided based on proposed OSW project characteristics.

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260	<p>A concentrated, coordinated effort already exists as previously explained and was overlooked by the authors of the Draft OSW Report. Besides the fish and invertebrate communities resident of the Scotian Shelf that are routinely surveyed, there exists the Atlantic Zonal Monitoring Program (AZMP). AZMP started in 1998 and operates in four Atlantic regions (including the Scotian Shelf) by DFO whose purpose is to collect and analyze biological (phyto- and zooplankton), chemical and physical oceanographic field data. The program runs every year, and the resultant data and interpretations are published each year in a “State of the Ocean Condition” report (https://www.dfo-mpo.gc.ca/science/data-donnees/azmp-pmza/index-eng.html). AZMP provides a characterization and understanding of the causes of oceanic variability at the seasonal, inter annual and decadal scales, provides multidisciplinary data sets that can be used to establish relationships among the biological, chemical and physical variables and provides adequate data to support the sound development of ocean activities. Noteworthy is the absence of any mention of this program in the draft report.</p>	<p>Added to Section 10.1.</p>
261	<p>Also of note is that the International Council for Exploration of the Seas (ICES) has a Working Group on Offshore Wind Development and Fisheries (WGOWDF) which focuses on the interactions between fisheries and offshore wind energy (https://www.ices.dk/community/groups/Pages/WGOWDF.aspx). This WG has over 50 members and has produced a couple of documents without any Canadian scientific participation</p>	<p>Noted.</p>
262	<p>The Draft Regional Assessment Report highlights the need for significant volumes of research data to support adaptive management and reporting for Offshore Wind (OSW). Although this is an important point, what’s missing is a thorough consideration of what should be done with the many and varied types of data necessary to support this. To maximize the value of collected data, to ensure it is usable in the present and into the future, requires a sound data management strategy at the outset. (Data management undertaken after data collection is both more costly and more difficult.)</p> <p>Given the broad array of data expected, a one-size-fits-all approach to data management is not appropriate, nor should a data management strategy be developed from scratch. There are national and international domain-specific repositories with expertise in this area (CIOOS, Ocean Tracking Network, Ocean Biodiversity Information System Canada, and more) which can be leveraged to ensure the appropriate metadata and data standards are applied.</p> <p>Consistently managed data further supports recommendation T1-3 of a shared repository of data and sources. High-quality and reusable data is also critical to achieving a comprehensive and holistic understanding of regional characteristics, and is necessary for a successful collaborative research initiative such as that recommended in T1-1.</p>	<p>Acknowledged. A data management strategy will likely have to be addressed by the CNSOPB. This organization is well suited for managing large amounts of data. Also see the Committee’s recommendation (T1-3) regarding the need to create a shared repository of data and sources.</p>

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	<p>A collaboratively-focused approach to OSW management will also require a departure from the privately-funded and privately-held approach to data that has been used in the past. To achieve this, and in alignment with federal and provincial open data policies, data collected with regards to Offshore Wind should align with the FAIR data principles and be made openly available wherever possible. This is particularly true for data collected in whole or part with public funds, or data required for regulatory purposes.</p> <p>Open data may also benefit developers; the Northeastern Regional Association of Coastal Ocean Observing Systems (NERACOOS), based out of New Hampshire, has received feedback that having access to real-time data can strengthen relationships between developers and other ocean users.</p> <p>Data management is an essential component of the research sphere, and is necessary to achieve success in the complex landscape of offshore wind-related activities. But it must also be funded appropriately. As an example of the resources required for a large-scale initiative, the data management project of the Transforming Climate Action program will support 6-8 individuals, and may require more in future.</p>	
263	<p>We note that in the Draft Report, the Committee makes no specific recommendation concerning the need for high-level assessment of sites beyond recommended PDAs before such sites are opened to potential offshore wind development. Additionally, as we explain in more detail below, we believe that only “Tier 1” PDAs identified by the Committee are ready to be opened to calls for bids for submerged land licencing. For “Tier 2” PDAs, we believe further high-level study is necessary. This further high-level study could potentially be conducted as part of a tailored follow-up program following this Regional Assessment (see our recommendations to that effect below), or it could potentially be carried out through strategic environmental assessments by the CNSOER. In light of the above, we urge the Committee to consider adding the following recommendations to its final report:</p> <p>The Committee recommends that “Tier 2” PDAs be assessed further before any areas within them are opened to calls for bids for submerged land licences. Further assessment could proceed as part of a follow-up program to this Regional Assessment or through strategic environmental assessments by the CNSOER.</p> <p>The Committee recommends that marine areas outside of the Committee’s recommended PDAs not be opened to offshore wind development without first being assessed, at minimum, through a strategic environmental assessment by the CNSOER.</p>	<p>The mandate of the Committee was to identify PDAs. Further assessment beyond this stage will be related to the wind energy areas and then to specific project sites. Note that the Committee recognizes that some PDAs (Tier II) will need further assessment before being considered as Tier I (refer to section 6). A follow-up program has been noted in the report.</p>
264	<p>Notably, the Committee for the NL Offshore Wind RA made a specific recommendation that an MSP be developed by the Government of Canada and Government of Newfoundland and Labrador “to inform</p>	<p>The Committee is supportive of DFOs MSP and recognizes the need for ongoing support (Refer to T1-4).</p>

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	<p>future planning and licencing processes for offshore wind development”. The Committee elaborated by writing:</p> <p>A component of the plan should include zoning areas for potential development of marine based alternative energy projects, within which offshore wind areas could be selected for licencing consideration to help reduce conflict in advance of impact assessment processes. The recommendation was also accompanied by corresponding recommendations that the Government of Canada “reinstate a long-term commitment to funding MSP and key initiatives currently contributing to MSP”. In our view, an analogous recommendation by this Committee would assist the Government of Canada and Government of Nova Scotia in their next steps to enable wind energy developments in offshore Nova Scotia. We therefore recommend that the Committee include a specific recommendation to this effect in its final report, echoing the Committee for the NL Offshore Wind RA: The Committee recommends that the Government of Canada and Government of Nova Scotia develop an MSP that clearly distinguishes offshore wind PDAs from marine areas where legal protection and conservation measures or fisheries will be prioritized. This plan should include zoning areas that establish these distinctions, to help reduce conflict in advance of impact assessment processes.</p> <p>As we suggested above, we imagine that an MSP of this kind should draw extensively on the Committee’s work in this Regional Assessment and that it should essentially be an adoption of the Committee’s recommendations concerning the 25-kilometre buffer from shore, the 25-kilometre buffer around Sable Island, and the eight PDAs, with significant exceptions being the Committee’s recommendations concerning the Western/Emerald Bank, Sable Bank, and LaHave Basin PDAs, for the reasons explained below in section 3.0.</p>	

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265	<p>We strongly support the Committee’s recommendation within the Draft Report that offshore wind projects not be excluded from requiring federal impact assessments, and we appreciate the Committee’s corresponding comments concerning the “emerging state” of the offshore wind industry in Canada and “the lengthy research agenda required to properly characterize biophysical and socio-economic impacts”, as well as the statement that this Regional Assessment cannot be a “substitute for a detailed site-specific project assessment”. We would note, however, that whereas the Committee suggests that impact assessments should be required “until key data gaps are addressed”, we would argue firmly that impact assessments should always be required for offshore wind projects. As the Committee is well aware, the marine environment is not static, nor are offshore wind technologies. There will never be a point where we attain such a level of certainty that offshore wind projects should be allowed to proceed without first being subject to project-specific assessments.</p> <p>Notably, under Canada’s Impact Assessment Act as it currently stands, only proposed offshore wind projects of ten or more turbines will be subject to impact assessments (future expansions surpassing a set threshold would also trigger the process). While we recognize that even initial “stepping stone” projects in offshore Nova Scotia are likely to have at least ten turbines, we nevertheless encourage the Committee to recommend that the CNSOER be given a responsibility to conduct an environmental assessment of a proposed offshore wind project when an impact assessment is not required. This responsibility would be fully in line with the existing responsibilities of both Offshore Petroleum Boards, which carry out environmental assessments of oil and gas exploration and exploitation activities that are not subject to impact assessments.</p> <p>In our view, this responsibility can and should be set out in a regulation under the amended Accord Acts.</p> <p>We therefore urge the Committee to consider the following addition to its final report: The Committee recommends that the CNSOER be required by regulation to conduct environmental assessments of proposed offshore wind projects when such projects are not subject to impact assessments.</p>	<p>Acknowledged - see sections 1.3 (OSW regulatory context) and 10.6 (T6-3) for more information regarding the CNSOER’s requirements to conduct environmental assessments.</p>
266	<p>T1-1 The Committee's proposed SSCRI would be established to benefit from combined contributions of the "scientific community" at large, in collaboration with rightsholders, stakeholders, coastal communities, and other ocean users. The Committee envisions those ongoing initiatives, like the DFO's marine spatial plan for the Fundy-Scotian Shelf region, would be incorporated into the SSCRI's activities. The SSCRI is envisioned as providing the framework for assessing any future developments in the marine area (not just offshore wind developments).</p> <p>As reiterated in the narrative portion of this submission, we strongly recommend an ongoing, integrative, tiered approach to the planning and assessment of offshore activities, including offshore wind development. The higher level of that approach would necessarily require assessment at a</p>	<p>Acknowledged. The decision to accept or not accept the recommendations of the Committee lies with the Minister. The Minister will also decide how to implement those accepted recommendations - this may be via a follow-up program or another approach. How the SSCRI would be established and details around core funding will need to be decided based on the direction of the Ministers and is outside the mandate of the RA.</p>

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	<p>regional or strategic level and would require integration of existing knowledge, information, and data from a wide range of rightsholders, stakeholders, coastal communities, and other ocean users. We are also supportive of high-level assessment that involves strategic planning, including MSP. To these ends, we strongly support this recommendation, and we suggest that the Committee consider recommending that the SSCRI initiative be implemented as a follow-up program to this Regional Assessment, per our comments below.</p> <p>The Committee has suggested that in order to succeed, the SSCRI would need at least 5 years of core funding. We recommend that the Committee further explore how the SSCRI would be established and funded. We suggest that a regional assessment follow-up program be established under the Impact Assessment Act. There is a recent precedent for the establishment of a regional assessment follow-up program: a follow-up program was established following the completion of the Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador. That follow-up program was established to monitor and report on the implementation and effectiveness of various outcomes of that regional assessment, including commitments made in the associated Ministerial Response to the Regional Assessment Committee Report for Offshore Exploratory Drilling East of Newfoundland and Labrador.</p> <p>Subsection 75(1)(a) of the Impact Assessment Act requires that participant funding be established to facilitate, in part, "the design and implementation of follow-up programs" in relation to designated projects.</p> <p>In our opinion, the Committee is entirely within its mandate to recommend the creation of a follow-up program. For example, paragraph 1.2(c) of the RA Agreement requires the Committee to identify and recommend mitigation and follow-up measures, and paragraph A2.3(b) of the TOR requires the Committee, in its final report, to include information about "recommendations for a Regional Assessment follow-up program to consider and incorporate any new and updated information that becomes available after submission of the final Report by the Committee, in order to help ensure that the Regional Assessment remains current and useful into the future and continues to fulfill its goal and objectives".</p> <p>We also recommend that the Committee propose specific timelines by which the SSCRI would be established.</p>	

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267	<p>T1-2 The Committee has suggested that the Impact Assessment Act requires developers to undertake project specific Mi'kmaw Ecological Knowledge Studies ("MEKS") and therefore recommends that the CNSOER be tasked with organizing a proactive execution of a MEKS for each Wind Energy Area.</p> <p>We note that the Impact Assessment Act does not specifically require proponents to conduct project-level MEKS. What it does require is consideration of Indigenous Knowledge provided with respect to a designated project. Such Indigenous Knowledge must be kept confidential when it is provided in confidence.</p> <p>We support the Committee's recommendation that MEKS in each Wind Energy Area be funded and suggest that the Committee provide more detail and clarity about who would be expected to fund MEKS and work with Mi'kmaq to ensure that a requirement for MEKS includes support for Mi'kmaw organizations carrying out the studies. During our engagement in the Fisheries and Other Ocean Users Advisory Group, we heard that there is limited capacity in Mi'kmaw organizations to conduct MEKS, partly due to a shortage of trained Mi'kmaw workers to conduct these studies.</p>	Corrected and acknowledged. This has been addressed in T1-2.
268	<p>T1-3 We support the Committee's recommendation that the CNSOER be responsible for providing a repository of project-specific data and maintaining, through liaising with the SSCRI, a record of research being undertaken that relates to offshore wind development.</p> <p>We also recommend that any such repository of data and sources be publicly accessible.</p>	Recommendation has been adjusted to include open-source data in T1-3.
269	<p>T1-5 The Committee understands adaptive management as a "hypothesis-based approach to meet objectives agreed to by all interested parties" that uses "qualitative and quantitative models to provide alternative approaches to issues".</p> <p>Adaptive management is an approach to resource management that strives to facilitate decision-making based on existing information and also accommodates changes in processes or decision-making based on new or emerging information. An important element of adaptive management is that it is an iterative process, where policies and practices are refined based on ongoing learning. In this way, adaptive management complements a tiered approach to assessment of offshore wind development and marine spatial planning.</p> <p>We strongly support this recommendation, and we agree with the Committee that the CNSOER, in collaboration with the Unama'ki Institute of Natural Resources, Confederation of Mainland Mi'kmaq, and universities, should develop and fund a research program to determine how Two-Eyed Seeing can best be deployed in decision-making processes and contribute to adaptive management.</p>	Noted.

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270	<p>T1-6 We support this recommendation.</p> <p>In its recommendation, the Committee has not stated who would be responsible for undertaking the general collection of environmental data. Since the objective of the data is, in part, to facilitate efficient management of the offshore area (and especially in the vicinity of PDAs), we suggest that proponents of offshore wind development should be responsible for helping to finance and support data collection.</p>	<p>The Committee discussed at length the desirability of identifying the data managers/hosts. It is clear that many departments (e.g. DFO, NRCan, ECCC etc.) already collect data serving their own needs. This data will be part of that needed to enable future management of the Shelf region, including in relation to any OSW developments. CNSPOB was tasked with managing the data in connection with previous oil/gas development, and so CNSOER might be appropriate in this case. It is also logical that funds from developers, who will benefit from the data collection, should be used in support of the work.</p>
271	<p>T1-8 We support this recommendation but propose that such participant funding must enable all rightsholder and stakeholder groups to provide input into all development phases of the nascent offshore wind industry in the RA Study Area.</p> <p>We suggest the following changes to the Committee's recommendation:</p> <p>"The Committee recommends that participant funding be established to enable the all key rightsholder and stakeholder groups, e.g., Indigenous peoples, the public, fisheries groups, NGOs etc., to provide input into all development phases of the nascent OSW industry in the RA Study Area. This funding should last at least five years to provide the groups enough time to adequately develop the capacity and gather the resources necessary to provide fulsome and informed input to the SSCRI."</p>	<p>Acknowledged, wording has been revised in T1-8.</p>
272	<p>T2-1 We support this recommendation.</p> <p>We suggest that a Port Advisory Group also assess the ability of Nova Scotian ports to contribute to the establishment of a Green Shipping Corridor and develop a strategy for the development of such a corridor in collaboration with Indigenous groups and local communities. We note that Transport Canada has provided funding under its Green Shipping Corridor Program to enable decarbonization of the marine sector and encourage ports to adopt clean energy and export clean fuels.</p>	<p>Acknowledged.</p>
273	<p>T2-3 We support the spirit of this recommendation.</p> <p>The Committee has commented that the Province of Nova Scotia must collaborate and establish partnerships with other jurisdictions in the region, the country, and around the world. We agree that collaboration is necessary. However, the recommendation is not clear about what a regional/national planning approach for the provincial Offshore Wind Roadmap would look like and who would be responsible for leading that work. We suggest that the Committee clarify this and also recommend specific timelines for this work, given the short timelines associated with the province's near-future goals under the Roadmap.</p>	<p>Acknowledged. Both the federal and provincial governments need to be involved. This has been identified in the 21FSP report specifically discussing supply chains and labour gaps (posted to Registry).</p>

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274	T2-4 We support this recommendation and suggest that the Committee also recommend that such studies include participant funding. We strongly support the Committee’s promotion of early planning with Indigenous communities, municipalities, and towns and villages (page 328 of the Draft Report) and suggest that the Committee frame its recommendation as an early planning approach.	Section 10.2 highlights the need that all recommendations under T2 are considered early planning approaches. Funding is recommended throughout section 10.
275	T2-5 We support this recommendation and suggest that Indigenous institutions also be engaged.	This recommendation considers post-secondary institutions. The mandates of the departments is noted including Indigenous institutions.
276	T2-7 We support this recommendation and suggest that the Committee state explicitly that GBA+ studies should be made publicly available.	Noted and added to section T2-7.
277	T3-1 We strongly support this recommendation. We recommend that the Committee explicitly include the 25-kilometre buffer around Sable Island in the text of its core recommendation. We suggest the quoted recommendation be written as follows: “T3-1 The establishment of a 25km coastal buffer zone and a 25km buffer zone around Sable Island”. The establishment of buffer zones around the province’s coast and around Sable Island is appropriate, and we support the Committee’s use of a precautionary approach in developing the buffer zones. Given that the 25-kilometre coastal buffer zone area is an area with a high level of conflict between potential OSW development and other ocean users, serves as an effective means to protect vulnerable migratory and at-risk bird or bird species, and also protects cultural and heritage values, we recommend that the Committee consider recommending an adaptive management approach that employs a rebuttable presumption that the coastal zone is not suitable for offshore wind development and requires proponents of offshore wind developments to prove that adverse environmental and socio-economic impacts could be effectively mitigated and show a need for offshore wind development within the coastal buffer zone that does not have alternatives. Economic feasibility must not suffice as rationale for development within the coastal buffer zone. We recommend that the 25-kilometre buffer zone around Sable Island not be eligible to be opened to offshore wind development in the future.	Acknowledged, see description in T3-1.
278	T3-2 We support the spirit of this recommendation, but we do not support inclusion of the Western/Emerald Banks marine refuge within a PDA. We strongly recommend that the Committee’s proposed Western/Emerald Bank PDA be re-categorized as a Tier 2 PDA.	Acknowledged. The Committee understands this as a project-specific concern.

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279	<p>We strongly support a multi-criteria bid process for submerged land licensing in the offshore area. As we have suggested elsewhere, bidding for submerged land licenses within the offshore area should be informed by centralized site identification so that submerged land licensing areas conform with marine spatial planning, conservation networks, and relevant policies to enable sustainable development that balances human and ecological needs.</p> <p>The Committee has recommended the following bid criteria to be prioritized for consideration in early bidding rounds: supply chain development, labour capacity development, support for research and development gaps under the SSCRI, linkages to “follow on” projects, and community development plans. We recommend that early bidding criteria also include ongoing support for marine conservation and community capacity building. We also recommend that bidders who support integration of renewable energy into the local electricity grid to facilitate movement away from fossil fuel be prioritized over export of hydrogen and ammonia. We also recommend that Community Development Plans explicitly require a plan for equitable and sustainable community development so that local communities bearing the adverse impacts receive an equitable portion of positive impacts.</p> <p>Our recommendations are supported by the Committee’s Draft Report. For example, the Committee found that the German government has implemented policy to allocate 5% of bid revenue to protecting marine biodiversity, that existing US state and European country offshore wind solicitation processes have leveraged offshore wind auctions to invest in ecological enhancement of their marine and aquatic ecosystems, and that Maine has required offshore wind procurement to be consistent with its Maine Offshore Wind Roadmap, which requires environmental and wildlife research, monitoring, mitigation, and conservation.</p>	Acknowledged, see T3-3.
280	<p>T4-1 We support the spirit of this recommendation.</p> <p>Offshore wind development in the RA Study Area may lead to more than just direct economic loss for fishers: it may lead to adverse environmental and socio-economic impacts for local communities. The development of offshore wind must be accompanied by community development plans that enable equitable and sustainable community development in the face of uncertain adverse environmental and socio-economic impacts. We would like to better understand the reasoning of the Committee’s recommendation at T4-1(d) that compensation not be addressed as a bid criterion or be the subject of a nonmonetary bid criterion for competitive leasing in order to understand how that reasoning would affect opportunities for local communities to receive benefits as part of the licensing process.</p>	See the reply to #333/10 and revisions to T4-5. Just as Fisheries Compensation can be addressed through bid criteria, Community Compensation/Development Plans may also be required as part of the bid process as referenced in T3-3(e).

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281	<p>T4-3 We support the spirit of this recommendation but cannot comment further because it is beyond the scope of our work at this time. We would appreciate having a better understanding of the Committee’s understanding of government subsidies. To our knowledge, this recommendation is the only mention within the Draft Report of the role of government subsidies for early projects, and it may be beneficial for the Committee to provide guidance or develop a recommendation about the use of subsidies to facilitate early offshore wind projects.</p>	<p>The subject of potential subsidization of development projects was mentioned in s.2.6.6 and not discussed in any detail as considered to be outside the Committee’s TOR. The Committee notes that early bid rounds in immature OSW jurisdictions have often attracted some form of subsidization.</p>
282	<p>T5-1 We strongly support the use of tiered assessment to better understand cumulative effects. We note that Recommendation T5-1 does not actually contain a recommendation about how tiered responsibilities for cumulative effects will be met in the future. We have addressed this at length in the narrative portion of this submission and do not reiterate our associated recommendations here. We recommend that in the remaining weeks it has available to it, the Committee begin modeling exercises for a cumulative effects assessment. For example, since the Committee has the authority to contract experts, we suggest that the Committee outsource the production of modeling with multiple development scenarios (including one scenario where there is no offshore wind development) for the proposed Western/Emerald Bank PDA or the Western/Emerald Banks marine refuge. We understand that such scenario modeling may not be completed before the Committee’s final report is submitted to government; however, there is precedent for work started by a regional assessment committee continuing after a final report has been submitted. During the Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador, the committee initiated the development of a geographic information system that was not completed until well after that committee’s final report was submitted. A scenario modeling exercise of the kind we are suggesting here could be completed or integrated into the SSCRI, but since time is of the essence and bids are expected in 2025, it is crucial that action on cumulative effects assessment be taken as soon as possible.</p>	<p>Noted. Additional text has been added to section 10.</p>
283	<p>T5-2 We support this recommendation but urge the Committee to clarify who will be responsible for preparing guidelines (e.g., the Impact Assessment Agency of Canada, the CNSOER) and include timelines in this recommendation, given the likelihood of bids in 2025.</p>	<p>Acknowledged.</p>
284	<p>T6-1 We strongly support this recommendation. We recommend that the CNSOER develop best practice guidelines in collaboration with Indigenous rightsholders, stakeholders, coastal communities, and other ocean users and that participants be provided with participant funding. We also recommend that the Committee recommend specific deadlines for completion of this work, given the likelihood of bids in 2025.</p>	<p>Acknowledged.</p>

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285	<p>T6-2 We strongly support this recommendation. We recommend that the Committee recommend that the CNSOER also have membership with expertise in public engagement, marine conservation, and fisheries.</p>	Acknowledged.
286	<p>T6-3 We strongly support this recommendation; however, we do not agree with the Committee’s statement that environmental assessments must only be required “until key data gaps are addressed”. On the basis of the precautionary approach, and in recognition that there will always be localized and cumulative effects, project assessments must always be required either under the Impact Assessment Act or by the CNSOER.</p>	Acknowledged.
287	<p>T6-4 We strongly support this recommendation. Vessel Monitoring Systems (“VMS”) would allow for better information and data about ocean uses and activities. As the Committee has noted, VMS would help with management of fisheries, aid with enforcement, support conservation and MSP, contribute to understanding of cumulative effects and changes due to climate change, and aid with emergency and rescue missions. We agree with the Committee’s conclusions. We note that VMS can be effective for aiding with enforcement. For example, VMS was recently used in the successful prosecution under the Oceans Act and Fisheries Act for illegal fishing in the St. Anns Bank Marine Protected Area off the coast of Cape Breton Island, NS. In our view, the lack of critical information about fishing activities and other ocean uses has been a challenge, or even presented a barrier, to the Committee’s work. VMS seems like an effective tool to enable better data creation for future MSP and decision-making processes in the offshore.</p>	Noted.
288	<p>T6-5 We support regular review of management and regulatory processes for the offshore area that is supported through meaningful public engagement. We would like to better understand how this recommendation to review current management practices and applicable regulations related to commercial fisheries is informed by the Committee’s understanding of practices, policies, and regulations related to DFO’s marine refuges and how this recommendation has shaped its recommendation of the Western/Emerald Banks marine refuge as a PDA.</p>	Noted.
289	<p>T7-1 We support this recommendation. We encourage the Committee to consider expanding this recommendation to also include the need for better education and training related to MSP and marine conservation.</p>	Acknowledged.
290	<p>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</p>	Acknowledged. Areas of study will inform research priorities within the SSCRI.

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	waters, as far as we are aware there are no proponents who have expressed interests in the other PDAs.	
291	<p>T1-2 Fund a Mi'kmaw Ecological Knowledge Studies (MEKS)</p> <p>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.</p> <p>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.</p>	Acknowledged.
292	<p>T1-3 Create a shared repository of data and sources.</p> <p>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.</p>	Noted.
293	<p>T1-5 Provide funding to Mi'kmaw organizations for research on adaptive management.</p> <p>GCIFA recommends funding for fisheries organizations for research on adaptive management.</p>	The Committee feels that there are other options in the recommendations to enable fisheries groups to obtain the funding they need.
294	<p>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.</p> <p>Yes, we agree, we need baseline data, and this should be tied to tier 1 and tier 2 designations.</p>	Noted.
295	<p>T1-8 Establish participant funding to last at least five years.</p> <p>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.</p>	The details on the source of funding and specific details of how funding will be allocated will be decided at a later date. The Committee has made recommendations around the governance structure and decisions on how the

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		various types of funding requirements will be the responsibility of that group.
296	T2-1 Establish a port advisory group. Yes, we agree, but who will fund this group?	The Committee has suggested that the participants in the Working Group provide funds. Ultimately, it will be up to the group to determine further funding requirements and sources.
297	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?	Acknowledged. The Committee has suggested the participants in the Working Group fund it. Ultimately, it will be up to the group to determine funding requirements and sources.
298	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.	Noted.
299	T2-4 Initiate socio-economic studies for key communities We agree with this recommendation, priority to communities first impacted.	Acknowledged. The Committee recommends priorities be developed based on the locations of leases being awarded and the communities likely to be most impacted.
300	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..." 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	Acknowledged.

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	<p>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?</p>	
301	<p>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.</p>	<p>Acknowledged. The Committee understands this as a project-specific concern.</p>
302	<p>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.</p>	<p>Noted.</p>
303	<p>We recommend 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.</p>	<p>Please refer to recommendation T2-1 regarding the establishment of a Port Advisory Group.</p>
304	<p>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?</p>	<p>Details related to specific compensation are unknown at this time; however, the Committee has made recommendations regarding compensation schemes in section 10 (refer to T4-4).</p>
305	<p>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.</p>	<p>Acknowledged. This could feed into Transport Canada work (T2-1) regarding establishing a Port Advisory Group, as suggested above.</p>

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306	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.	Acknowledged. Marxan Analysis was conducted outside of the RA and provides an example scenario with Marine Refuges excluded under the precautionary approach. The Committee has considered the nuisance of Marine Refuges as OECMs in recommendation T6-5 and has recommended that DFO revisit and update the purpose and management of marine refuges, relative to national and international OECM designations, and explore potential opportunities for mutually beneficial coexistence plans with OSW farms.
307	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.	Acknowledged, refer to T1-8.
308	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.	Noted.
309	The new eight PDA’s have a collective area of 31,200km ² . The previous 6 PFDA’s had an area of 11,510km ² . 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?	Noted. The process of refining suitable development areas and micro-siting within PDAs is iterative and will continue to be informed by existing and future work programs including information gained through implementation of many of the recommendations made in the Report.
310	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	Acknowledged.

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	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.	
311	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?	Acknowledged. The Committee's assumption is that any development will be phased, in part because of the current limited offtake pathways, in part because of the lack of required infrastructure and in part because of the demands that development will place on an immature supply chain and already stressed labour pool. All of these issues are discussed further in the 21FSP Report.
312	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?	Acknowledged. This will be described by the CNSOER guidelines and authorizations.
313	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. 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 responsible for the build. 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.	Acknowledged.
314	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.	Noted.

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315	We recommend 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.	Noted.
316	<p>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 results in a high unemployment rate compared to other counties in Nova Scotia.</p> <p>If this new economic development can offer employment during closed fishing seasons, then that would be a positive impact for our communities</p>	Specific questions related to the provincial and municipal approaches on education are outside the mandate of the RA. Recommendation T7-2 acknowledges the need to develop outreach programs for education and training and to work with people who have been/are employed in a marine industry including fisheries. The details of how this will be achieved need to be discussed by the relevant regulatory agencies, municipalities, academic institutions etc.
317	<p>We understand the proposal of a 25-KM buffer zone as a measure to protect the traditional fisheries sector operating in the 25-KM zone surrounding Nova Scotia’s shoreline. And in some cases, this 25-KM buffer may be needed, however there may be opportunities for co-existence and/or cross-sector partnership in some areas within or near the 25-KM zone. The OSW sector technology and processes are ever-evolving, and so too will the potential for co-existence and cross-sectoral partnerships. How can we safely explore co-existence and/or partnerships in working with the proposed 25-KM buffer? There are already many criteria in place to determine the PFDAs, and determination of an OSW project, and understanding appropriate buffer distances. Additionally:</p> <ul style="list-style-type: none"> ● Could there be consideration based on a “project-by-project” basis via the unique characteristics of a proposed project with consideration of existing regulatory requirements (including environmental requirements) which may permit an OSW project to be established within the 25-KM buffer or may in fact need a larger than 25-KM buffer (to be determined based on feasibility, consultation, and other regulatory and necessary criteria)? ● Could we not further explore co-existence models and cross-sectoral partnership models based on international best practices (for which Nova Scotia can mirror) and collaborative cross-sectoral spatial mapping? ● It will be important to ensure that any modification of the proposed 25-KM buffer be a data-driven and a science-based, transparent process applied during project and regulatory activities, to allow for potential around co-existence and/or partnership opportunities. 	Acknowledged. Project-specific concern and has been described in T3-1.

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318	<p>Tier Designation vs. Project Assessment/Tier Evolution: We believe that the tier designation of sites should evolve as a result of the work of OSW developers/industry who will determine their site location and then will be undergoing processes based on existing regulatory requirements (including environmental requirements), as well as possible considerations for co-existence with other sectors and potential partnerships with other sectors. Tier designations should evolve in parallel as the sector evolves. Pre-determining tiers may negatively impact this new emerging sector’s ability to grow and evolve, and/or deter developers from considering Nova Scotia for their OSW projects.</p> <p>It would be less restrictive to grow the OSW industry if projects are gauged on an individual basis as per their preferred marine locations while undergoing rigorous review of their proposed project, factoring in proximity to sensitive marine areas, shipping routes, fishing grounds (and other variables) so that the proposed OSW projects meet the highest standards of safeguards for the environment and are in so that they maximize benefits to the region and the Province.</p>	<p>Noted. The process of refining suitable development areas and micro-siting within PDAs is iterative and will continue to be informed by existing and future work programs including information gained through implementation of many of the recommendations made in the Report. Refer to section 6 and Section 10 (T3-2) for additional information on Tier designation and site development.</p>
319	<p>Offshore Wind Sites: More work should be done to determine OSW areas – and much more time, data, and consultation is needed to allow for the tier designation to evolve (if it is even necessary to tier OSW locations). We would not want to prematurely designate the currently identified sites for OSW or ignore other potential sites – because it could be interpreted as picking “winners and losers” as the OSW sector develops and evolves. That is why it is so important to ensure these designations evolve with data, study, feasibility, consultation, and other necessary processes.</p>	<p>Noted. The process of refining suitable development areas and micro-siting within PDAs is iterative and will continue to be informed by existing and future work programs including information gained through implementation of many of the recommendations made in the Report. Refer to section 6 and Section 10 (T3-2) for additional information on Tier designation and site development.</p>
320	<p>T1-1: Develop a Scotian Shelf Collaborative Research Initiative (SSCRI)</p> <p>The recommendation to develop a collaborative research initiative for OSW is very much needed to support the long-term success of the OSW sector in Nova Scotia. In fact, this need/opportunity has already been identified locally in the Strait region by the proponents of Team Cape Breton Strait who completed their regional assessment to accelerate economic development via the MIT-led REAP program undertaken by Nova Scotia regional teams in 2020-2021.</p> <p>Building on the REAP program recommendations for an OSW research center of excellence, this piece of work was progressed by some members of the local REAP team, the Strait of Canso Offshore Wind Task Force, as well as by local municipalities, the Province of Nova Scotia, and Federal partners.</p>	<p>Noted.</p>
321	<p>OSW Center of Excellence (OSWCoE) Business Case and Opportunities Appraisal: With funding from the Nova Scotia Department of Natural Resources and Renewables (DNRR) and the Atlantic Canada Opportunities Agency (ACOA) and financial contributions by partnering municipalities of both the Town of Port Hawkesbury and the Municipality of the County of Richmond have commenced an Offshore Wind Centre of Excellence (OSWCoE) Business Case and Opportunities Appraisal. The project steering committee is made up of representatives from the funding organizations as well as Potlotek First</p>	<p>Acknowledged. A detailed update is not possible as the RA is now complete, however the Committee assumes that the role of the OSWCoE will be considered by the parties acting on the SSCRI.</p>

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	<p>Nation, Net Zero Atlantic, and Marine Renewables Canada. The OSWCoE will fulfill the role of creating a collaboratively umbrella for OSW related research, innovation and development in Atlantic Canada (and potential for testing sites).</p> <p>Considering the broad support for the OSWCoE initiative from both Federal and Provincial levels of Government, the RA Committee should acknowledge and add the progress completed to date for the OSWCoE under this recommendation, as there has already been significant time, study, funding, and effort made towards this RA “identified” recommendation. We are happy to provide more information on the OSWCoE project.</p>	
322	<p>T1-7: Open discussions with the State of Maine to contribute to and develop a mutually supportive research agenda associated with their proposed floating OSW test site. We believe seeking a mutually supportive research agenda by establishing a floating OSW test site is a step in the right direction. However, this discussion must also include port development considerations and targets to support/sustain floating OSW technology.</p>	Acknowledged, addressed in T1-7.
323	<p>T2-1: Establish a Port Advisory Group</p> <p>The Irish example is interesting and is a good case study given the similarities to Nova Scotia. However, Ireland is also relatively new to OSW, so it may be beneficial to look at port advisory groups and port collaboration models from countries much more advanced in OSW sector development. The Scottish Ports Alliance or initiatives that have enabled cross-country/port collaboration on projects in the North Sea are examples. More clarity is also needed from the RA report – to explain if the Irish Port Coordination group was established before or after the seabed licensing auction round.</p>	The Irish example was used due to the similarities it has to NS. The structure employed in the Irish example seemed logical to the Committee but may not be the only relevant example. The Committee assumes that once the Working Group is established, considerations can be given to other models if viewed as more appropriate.
324	<p>T3-3: Development of Bid Criteria and bidder pre-qualification</p> <p>There is no mention of community benefits or shared ownership models in this recommendation for bid criteria. Community benefits are an important aspect of OSW in other jurisdictions, because it helps to build social license and contributes to both economic and community development. It is unclear from the report if the RA sees this arrangement as part of the non-price criteria or whether it should be left to developers and communities to develop community considerations on a voluntary basis.</p>	Acknowledged. The Committee has identified the possibility for Community Benefits Plans to be described in the bid criteria process.
325	<p>The report’s work on compensation for lost fishing opportunities is an important factor in this development. Local fishermen have made their livelihood on the sea and for many, these potential offshore areas are in potential conflict with their livelihood. We strongly endorse work to find proper balance between both industries so there is co-existence. Furthermore, if balance cannot be achieved, compensation and its methodology is an important element if the project seeks acceptance.</p>	Noted.
326	<p>We note that risks were identified, and at least a theoretical strategy to mitigate risk is noted in this report. Council is asking what response would be in place if mitigation efforts were unsuccessful. What</p>	Addressing non-compliance of a project would be the responsibility of the CNSOER as this organization ensures

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	restrictions or regulations would apply to the developer in the case where their development is noncompliant.	that operators are accountable throughout the lifecycle of an authorized activity. Non-compliance (under the Accord Acts), including not adhering to environmental protection regulations, may result in penalties.
327	Could council understand the approximate timing of the Tier 2 development, and what factors, if any, could delay the Lahave Bank potential development. Would the community be able to engage with the committee at that time?	Noted. The Committee's work on the RA and proposed OSW areas has finished. The following steps will be dependent on which areas the governments identify and adopt as WEAs, the response from industry and processes that follow.
328	<p>On page 339, recommendation T5-2 states the following: "T5-2 Prepare guidelines and data sources for developers A project proponent is required pursuant to the Impact Assessment Act (IAA) to undertake a CEA. It is imperative that guidelines and direction to the proponent outline the proponent's responsibilities in regard to the effects of the specific project. An integral part of the requisite guidance will be to provide information on the spectrum of support that can contribute to the project CEA from other agencies such as DFO, ECCC and TC. To reemphasize, the Committee is of the opinion that cumulative effects assessment should be perceived as a tiered and shared responsibility." The recommendation appropriately highlights the need for clear guidelines and access to data sources to support developers in meeting their CEA obligations. This focus ensures project-level CEAs can be completed with adequate support. However, the recommendation does not address how data generated by developers will contribute to broader regional planning efforts or adaptive cumulative effects management. Additionally, it lacks specificity on how guidelines will address the integration of project-level CEAs into the larger context of regional and tiered assessments. The recommendation could be strengthened by including expectations for developer-generated data to be shared and leveraged for adaptive offshore wind (OSW) planning and regional cumulative effects (CE) management. This could involve requiring developers to submit standardized data to a central repository that supports regional monitoring and planning efforts. Additionally, the guidelines should detail how developer data will inform iterative decision-making processes, ensuring alignment with long-term sustainability goals. The Open Science and Data Platform (OSDP) is an existing tool that could be useful. In particular, it would be helpful if proponent data sources could be shared on the OSDP.</p>	
329	We recommends marine spatial planning (MSP) be used in planning and site selection for offshore wind, to ensure that the approach used is consistent and includes comprehensive data. This approach should include clear objectives for existing and future ocean uses as well as for conservation. DFO has resources and tools available to support future marine planning discussions. MSP can be used to	The Committee is supportive of DFOs MSP and recognizes the need for ongoing support (Refer to T1-4).

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	develop multiple scenarios which explore different options to meet economic, social, and ecological targets across different sectors.	
330	Consider adding to the report the importance of re-evaluating and updating the PDAs (or Wind Energy Areas) when new information is available. For example, when new data and results from the monitoring projects are available, if new species are listed under the Species at Risk Act, or if new or refined critical habitat for species at risk is identified.	Addressed in section 6.6.
331	<p>Recommendation T1-3: This recommendation is interesting, but it aligns with and potentially duplicates the purpose of existing data repositories, e.g., the Open Data Portal, the Open Science Data Platform, the Nova Scotia Open Data Portal, and the Canadian Integrated Ocean Observing System. A separate data repository exclusively for offshore wind planning may not be justified, but rather identified data gaps should be filled and shared on public platforms.</p> <p>DFO would request that data collected as a result of recommendations in this report (e.g., increased PAM efforts, page 307), be shared with DFO and/or added to any shared repository.</p>	Amendments have been made to the text in recommendation T1-3.
332	Recommendation T1-6: Consider collecting data on other marine species (e.g., fish and sea turtles) and their habitats in addition to marine mammals. More information is also needed for species sensitive to EMF (e.g., sharks). Consider making this recommendation applicable to all species at risk that occur within the study area (not just marine mammals).	This detail is covered under the umbrella of the SSCRI.
333	Recommendation T4-1: Such a regime would require significant legislative development, new regulations, and the identification of a lead federal authority. Have there been thoughts on who would fulfill that authority role?	The subject of compensation has been thoroughly discussed in the body of the report (s.2.6.5) and in recommendation T-4. It is suggested that a compensation Guideline could evolve from section 98.7 (c) of the Accord Act in the form of a regulation, or as in other jurisdictions, through a Guidance document or Guideline incorporated into the bidding process. In either case, presumably at the back end of an engagement process undertaken by the recommended Fisheries Working Group where an effort would be made to build consensus on the regulation or Guideline content, implementation, funding and claims management process.
334	Recommendation T6-4: Suggest rewording the first sentence as this is copied verbatim and not referenced: https://publications.gc.ca/collections/collection_2016/mpo-dfo/Fs114-21-2015-eng.pdf It's worth noting that requiring VMS would come at a large cost to the fishing industry. Many operate	Acknowledged. Modifications have been made to the text in T6-4.

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	<p>smaller vessels with relatively lower incomes. Regarding the statement “Not all commercial fishing vessels, i.e., lobster and groundfish vessels less than 45 feet, are required to participate in this program, and currently there is some discrepancy in mandatory participation between DFO regions...”, note that the evaluation of each fishery and its corresponding monitoring requirements is made on a case-by-case basis. In some cases, VMS is simply not required. Regarding the statement “It appears to the Committee that the lack of mandatory fishing vessel participation in these programs needs to be addressed...”: Note that the need for monitoring in the management of fisheries is part of the Integrated Fisheries Management Plan process. This is reviewed regularly through Advisory Committee meetings. Furthermore, DFO is incrementally implementing the Fisheries Monitoring Policy in fisheries. While DFO understands the benefits of greater VMS requirements in an offshore wind planning context, it is not necessary for the management/monitoring of all fisheries. Management of fisheries is determined on a case-by-case basis and VMS viewed as one tool in the toolbox.</p> <p>This recommendation does not fall under the mandates of the Ministers receiving this report. It is best directed to the Ministers of Transport Canada and Fisheries and Oceans Canada. For recommendations aimed at ministries beyond that of the RA report, what will be the mechanism for delivering these?</p>	
335	<p>Recommendation T6-5: This recommendation appears out of scope of the Regional Assessment’s Terms of Reference. DFO requires additional information about this recommendation before providing an informed response. This recommendation does not fall under the mandates of the Ministers receiving this report. It is best directed to the Minister of Fisheries and Oceans Canada. For recommendations aimed at ministries beyond that of the RA report, what will be the mechanism for delivering these?</p>	<p>Modifications have been made to the text in T6-5.</p>

#	Comment	Committee Response
11.0 Conclusion		
336	<p>(2.0 OSW) - We request additional information on criteria used for evaluating the relevance and applicability of Indigenous Knowledge in decision-making processes. This includes identifying specific indicators that can inform the selection of OSW sites, mitigation strategies, and monitoring plans. We request additional information on how Indigenous peoples and Indigenous Knowledge will continue to be included as part of any adaptive management associated with OSW developments.</p>	<p>Text has been added to the conclusion.</p>
337	<p>General comment #1: Before any further review, please note the paramount and necessary differentiation between Rightsholders and stakeholders. Rightsholders are not solely another group of stakeholders to engage. Indigenous peoples have Rights affirmed and protected under Section 35 of</p>	<p>The Committee's mandate does not include consideration of potential infringements to Constitutional rights. All comments have been included in the What We</p>

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	the Constitution Act. As such, no Federal department representing the Crown should introduce new regulations or documents to the general public before conducting meaningful consultation with local First Nations. In this case, First Nations should have received this report for review before its publication online.	Heard Summary section of the report. The Committee made significant efforts to engage with Indigenous participants and communities in the region as per the RA mandate which was specific in stating that the RA involve engagement, not consultation at this stage. The Committee's timeline did not permit in advance review of the draft Report, but notes the concern and expectation expressed.
338	<p>MRC is concerned that the RA process and nature of the final RA report may not be well understood. The RA Committee's Draft Report states that "It is important to know that the Committee's recommendations are not binding on the Ministers, and that Ministers have complete discretion to determine if and how the results and recommendations of the Regional Assessment will be used." While this is clearly stated, it will be important that there is clear communication about how the report will be used by Ministers and for decision-making to avoid confusion that the Final Report is binding or similar to the regulatory outcomes and requirements of an impact assessment.</p> <p>This is particularly important if some recommendations of the Final Report are not adopted or implemented. MRC recommends that the publication of the RA final report and subsequent communications from the Minister/government departments include clear language about how the content of the report will be used as a tool to inform future decision-making, rather than the result of a decision-making process. It will also be important for government to provide clear rationale for future decisions that is communicated broadly and the result of early engagement and consultation.</p>	Noted.

#	Comment	Committee Response
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765	<p>As a dedicated Nova Scotian citizen with a background in quality engineering and a commitment to reducing our carbon footprint, I am thrilled by the prospects of offshore wind development in our region. Offshore wind not only aligns with Canada's national commitments to clean energy but also offers Nova Scotia a transformative opportunity to build a sustainable and prosperous future.</p> <p>Offshore wind is one of the most reliable and scalable renewable energy sources available today. With Nova Scotia's strong offshore wind resources and a proven history in marine and engineering industries, we are uniquely positioned to lead Canada in this area. The potential for job creation, local economic growth, and environmental stewardship is unprecedented. As someone familiar with the</p>	Acknowledged.

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	<p>technical and operational challenges in offshore environments, I understand the importance of rigorous impact assessments, stakeholder engagement, and continuous quality assurance. However, I am also confident that with proper planning, offshore wind in Nova Scotia can be developed safely and responsibly. I urge the Canadian Impact Assessment Agency to prioritize this regional assessment, streamline processes, and support developers in making offshore wind a reality here in Nova Scotia. We need action that is both ambitious and immediate. Offshore wind development can be a pivotal step towards achieving Canada’s clean energy goals, ensuring a sustainable future for generations to come. Thank you for considering my comments as part of this vital initiative.</p>	
766	<p>Will new U.S. administration change wind turbine industry?</p>	<p>It is outside the mandate of the Committee to comment on the potential influence of the U.S. administration on the Canadian OSW industry.</p>
767	<p>I believe there is an opportunity to enhance the report by better integrating the Netukulimk principle, as emphasized in the Nova Scotia Environmental Goals and Sustainable Prosperity Act. While the report references this principle, it falls short of outlining concrete strategies to prioritize the well-being of communities and ecosystems. Specifically, it lacks clear goals and actionable steps for meaningful and respectful consultation with the Mi’kmaq people. A more robust integration of Netukulimk, with defined pathways for balancing environmental, economic, and cultural priorities, would strengthen the assessment and foster trust, collaboration, and long-term sustainability.</p>	<p>Acknowledged. Development of strategies and integration of Netukulimk at the project level is outside the Committee's mandate and scope.</p>
768	<p>Consider Australia’s “speed dating” approach, with each potential developer presenting to First Nations</p>	<p>This is project-specific and is outside of the RA Committee's mandate and scope.</p>
769	<p>A critical area needing more focus is how the energy generated will directly benefit NS. Lack of a readily available grid poses a significant challenge, risking energy exports to other jurisdictions instead of supporting local growth. Without a clear framework for energy utilization, NS may miss out on the economic and environmental benefits of this development. A robust evaluation framework is urgently needed to ensure offshore wind energy powers NS’s progress, supporting our communities, economy, and climate goals.</p>	<p>The Committee has provided recommendations related to these capacity and preparedness issues throughout section 10.</p>
770	<p>Recommend doing a “Lessons Learned” on the RA, including level of engagement in communities</p>	<p>This is outside the scope of a single RA; however, governments typically consider a review, and lessons learned following the conclusion of a process.</p>
771	<p>There is not really enough time to review this information ...you are moving to fast ..</p>	<p>Noted.</p>
772	<p>There are a number of important points raised in this feedback that deserve careful consideration. Questions about how site selection criteria were developed, how social and economic priorities are balanced, and what benefits are being offered to communities and Indigenous groups all point to areas where greater transparency would strengthen the regional assessment. These are not minor issues and</p>	<p>Acknowledged.</p>

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	<p>addressing them is essential to ensuring the process is both fair and effective. That said, I think it's a positive step that these challenges are being acknowledged and brought into the conversation. Offshore wind development is a complex undertaking, and it's encouraging to see efforts being made to address not only the technical aspects but also the broader social and environmental implications. With some adjustments, this assessment has the potential to set a strong example of how large-scale projects can be approached responsibly and inclusively. Ultimately, I feel there's a good foundation here, but it's important to make sure these concerns are addressed in a way that builds trust and credibility among all stakeholders.</p>	
773	<ul style="list-style-type: none"> • Recognize the significant effort put forth by the RA committee through this process and applaud the quality and comprehensiveness of the draft report. • Appreciate the efforts made by the committee to consider stakeholder inputs and concerns related to the interim report and address these concerns in the draft report recommendations. • Concur with committee's view of the scale of the opportunity for Nova Scotia and support the recommendation for the development of a regional or national roadmap to effectively support the sector's sustainable growth. 	Acknowledged.
774	<p>The TRP team's efforts have also extended to building constructive relationships with commercial industry associations, lowering tensions on and off the water between KMK-supported First Nations and Commercial stakeholders. This ongoing relationship has opened avenues for dialogue and mutual understanding, promoting a shared commitment to sustainable fisheries and economic development.</p>	Noted.
775	<p>Despite these successes, challenges remain, particularly in the current Canadian political climate, where the recognition of Mi'kmaw self-governance rights and authorities continues to be an ongoing hurdle. Mi'kmaw communities are working towards broader acknowledgment and support from Canada and its departments for their inherent rights to manage and regulate their own fisheries. This commitment to self-governance and recognition of rights-based fisheries remains crucial for the full realization of Mi'kmaw inherent Aboriginal rights and Treaty rights as recognized and affirmed under the Constitution Act, 1982.</p>	Noted.
776	<p>Our office recommends that future offshore wind developers with projects happening in Mi'kma'ki contact KMK's Benefits Department as early as possible to start the early engagement process. This may lead to the establishment of a Memorandum of Understanding with the Assembly of Nova Scotia Mi'kmaq Chiefs, with the development of an Impact Benefits Agreement to follow. The Benefits Department could also assist in connecting developers to the Indigenous employment officers closest to the project for Mi'kmaw looking for employment in offshore wind projects. As the offshore wind sector develops, there is a huge opportunity for the Mi'kmaq of Nova Scotia to be active players as rights holders as well as for potential equity ownership on these projects. As this industry develops, proponents and regulators must look at the nearby Mi'kmaw Communities and ensure Mi'kmaw owned</p>	<p>Comments noted as is the signing of an MOU between the proponents of the Nova East Wind project and the Assembly of NS Mi'kmaw Chiefs referencing a pending Benefits Agreement (https://novaeastwind.ca/wp-content/uploads/2024/11/PRINT-READY-professional-NovaEastWind-Newsletter-Nov12-2024.pdf). The RA Report contains multiple references to the importance of Indigenous participation to the successful development of the industry and this is also discussed in the 21FSP</p>

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	businesses are being contracted and/or subcontracted for opportunities where available. This industry has major potential to participate in economic reconciliation and ensure The Mi'kmaq are well represented and informed from the beginning as this industry develops.	Report where gaps in the existing supply chain and anticipated labour deficiencies are noted. The Report notes that Government policy around industrial benefits can be reflected in the establishment of licensing bid criteria. Specific issues related to rightsholders are outside the scope of the RA.
777	The size of the area affected by OWE activities, the duration and frequency of OWE activities, the magnitude of change as a result of OWE activities, the important biodiversity areas, and their legal status should be assessed.	The RA is meant to be high level and broad. Details related to project specific considerations will be assessed as part of the impact assessment process.
778	The possible alternatives, which among others include location alternatives, scale alternatives, and technology alternatives should be assessed.	Alternatives are considered as part of the impact assessment process.
779	Distinction and priority should be respectively made among avoidance, mitigation, and compensation measures.	The RA is meant to be high level and broad. Distinction and priorities cannot be identified at this time.
780	We request that the final report includes a detailed analysis of how future climate change scenarios could affect OSW projects and the PFDA's. Additionally, we request that the final report outlines how climate change will be considered during the impact assessment phase, as well as how it will influence design considerations and the development of mitigation and monitoring programs.	A detailed analyses of climate change scenarios is outside the scope of the RA. Reference to consideration of climate change is provided and considered throughout the report.
781	Was anyone within the Federal or Provincial government or OSW industry advised or consulted prior to the draft report being released?	The draft report was provided to partnering agencies 24 hours prior to posting on the Registry. There was no government consultation.
782	Why wasn't a representative for the Nova Scotia offshore commercial fishery appointed to the RA committee considering the largest impact of OSW would affect the offshore commercial fisheries.	The RA Committee cannot speak to the process of selection of Committee members. This was done by IAAC and was based on specific criteria, one of which was avoidance of bias. A member of the commercial fishery would not have met this criterion.
783	Anxiety exists that industry's last resort of appeal against OSW impacts is to rely on a petition to a hierarchical regulatory energy compensation process to determine the future of their fishery.	Noted.
784	We recommend that the Committee look at the climate risk index (Boyce et al. 2022; 2024) and explore climate change scenario planning for commercial and at-risk marine species that has case studies focused on Atlantic Canada. Buffer zones and scenario planning are also ways to mitigate the effects of the lack of tangible stock assessment in some areas for forage fish stocks and will incorporate a precautionary approach to species risk management in the face of climate change.	Noted. While looking at this climate risk index could have been interesting, a climate change scenario planning for commercial and at-risk marine species is outside the scope of the RA.
785	Additionally, we recommend that the Regional Assessment also incorporates climate resilience strategies for offshore wind infrastructures and how resilient those infrastructures will be to climate change. The Regional Assessment should	Noted. While incorporation of climate resilience strategies for offshore wind infrastructures and how resilient those infrastructures will be to climate change

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	consider the region's harsh weather and ensure that all future wind installations must be climate-proof to enable their long-term viability and minimize risks to marine life in case of structural failures or accidents.	could have been interesting, it is outside the scope of the RA.
786	We commend the inclusion and application of Two-Eyed Seeing throughout the Regional Assessment process and encourage the Committee to maintain this approach as the project moves forward.	Please note that there is no project at this time. The Regional Assessment, which ends with the submission of the final report in January 2025, has incorporated Two-Eyed Seeing throughout the process and encouraged this approach to continue.
787	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.	Noted. The timeline for public comment periods are typically 30-45 days. The public comment period for the RA was 50 days.
788	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 ² 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.	Specifics related to government policy are outside the scope of the RA. Information on the province's roadmap is available on their website.
789	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 ² 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.	While appreciated, there was never an expectation from the Committee that GCIFA monitor any of the ocean space. Information on specific areas that are fished and traversed by fishing vessels is important and will inform specific projects but will be needed as part of the project impact assessment process. The TC tool for tracking details on fishing and vessel movements will be useful at that phase. See recommendation T4 requiring improved baseline delineation of fishing activity once WEAs are established.
790	It does not feel like we are any further ahead in this process by expanding the areas under consideration?	The justification for enlarging PDA boundaries is provided in section 6.5.
791	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, losing 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.	Noted. These potential impacts are related to specific projects and will need to be addressed, once wind energy areas are defined and then as part of the project specific impacts assessment processes.

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792	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 process has been very open and transparent. The letter that GCIFA is referring to was posted to the Registry immediately after receipt and participants were informed of the posting and provided the link. GCIFA is directed to: https://iaac-aeic.gc.ca/050/documents/p83514/158345E.pdf
793	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 ² of ocean space.	The Committee's mandate did not refer to a GW target but required the identification of potential locations for OSW development. Restricting the area available for OSW at this time before there is a fulsome understanding of substrate and sea bottom characteristics is not a feasible approach to a new industry and more data needs to be collected to address this (see section 10). The intent of the areas defined in the Interim Report was (as noted in the Interim Report), to spur feedback from all participants. The final PDAs provide more flexibility around siting of projects and, at the project level, micro-siting of individual turbines. The Committee was very clear on this approach.
794	We feel the fishing industry should have refused to participant 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, mislead and deceived.	The RA process greatly benefited from the extensive engagement with fishers and fishing associations throughout the RA process and GCIFA was one of the most involved groups. Participation funding was provided to fund this participation and direct outcomes from discussions with GCIFA and other fishery representatives were a large part of the Committee's deliberations and informed the recommendations. Research completed by GCIFA was done independently and was not requested by the Committee.
795	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	The potential benefits and costs for this industry are currently unknown because it is still in the very early stages. Further studies (as noted in the Committee's recommendations in section 10) will help to inform

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#	Comment	Committee Response
Not Applicable (N/A)		
	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.	multiple facets of an OSW industry including the identification of benefits to Nova Scotians.
796	The report's structure, level of detail, and citations could be reviewed for consistency, as there is some redundancy in sections and unclear linkages between science points and the associated literature. Further, hyperlinking to specific documents provided by agencies is recommended over links to the IAAC registry.	The overall structure of the report will not be changed for the final edition. Hyperlinking to documents on the Registry follows the IAAC process for RAs and is consistent with how the Committee has shared information throughout the RA. Edits to clean up references has been done.

#	Comment	Committee Response
Other		
797	One highly important prey fish species known as sand lance was never mentioned in the text of the report (in Tables 6.8, Appendix 4.4, 4.6) and as the name implies it is strongly associated with sandy bottoms where it buries itself during daylight and emerges at night for feeding. It is normally very abundant and a dominant prey item for most groundfish on the Scotian Shelf as well as many marine mammals (seals and whales) and seabirds. In Appendix 4.6a, sand lance was omitted from the description of the Emerald/Western/Sable Island bank complex. Why? Same could be said for capelin.	Both species (sand lance and capelin) are noted. in the Report in Appendix 4.6. Data received from DFO did not include either species in the Emerald/Western/Sable Island EBSA.
798	The different types of zones identified in the RA should be included in the glossary (i.e. exclusion, safety, navigation). DFO uses terminology such as a "mitigation zone" as an area that is monitored before and during the conduct of a work, undertaking, or activity (WUA) to ensure that marine animals are not present. The mitigation zone boundaries vary depending on the WUA, project location, species and other considerations. The term "safety zone" may be interpreted differently by the life cycle regulator in the future so it is recommended to verify terminology with them as well.	Terms added to Glossary.
799	Glossary: Mollusks are not considered mobile species but are normally sessile (re: term Artificial Reef Effects).	Amendments have been made to the Glossary.
800	Appendix 4.2: Regarding the green crab, note that there are active commercial fisheries in Southwest Nova Scotia, Eastern Nova Scotia, and a new fishery that might be approved for Southwest New	Amendments have been made to Appendix 4.2.

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Other		
	Brunswick soon. Please follow up directly with DFO for additional information on these fisheries if required.	
801	Appendices 4.1, 4.4 and 4.5: Consider including either a 'Life History Characteristics' or 'Habitat and Distribution' column.	Noted.
802	Appendix 4.6: Additional information to include here: <ul style="list-style-type: none"> • Scallop abundance on Browns Bank, Western/Emerald Bank, Sable Island Bank Complex, and Middle Bank. • All these above-mentioned areas have, or have had in the recent past, sufficient productivity for sizable fisheries and annual science surveys. 	Amendments have been made to Appendix 4.7A (previously labeled Appendix 4.6).
803	Appendix 4.6A: The Appendix Table states that the Eastern Shoal EBSA supports Atlantic surf clam however in the original documents (King et al. 2013 and Doherty and Horsman 2007), no species is specified. This should be verified. While both Arctic and Atlantic are used, the common name used in recent DFO reports is Arctic Surf Clam (<i>Mactromeris polynyma</i>). See the latest Science Response: https://www.dfo-mpo.gc.ca/csas-sccs/Publications/ScR-RS/2024/2024_038-eng.html Also see: https://www.dfo-mpo.gc.ca/fisheries-peches/ifmp-gmp/clams-palourdes/offshore-hauturieres-eng.html	Amendments have been made to Appendix 4.7A (previously labeled Appendix 4.6).