



*tabled by the member
for Jura Nova - with
leave
K Hawley George
March 11, 2025*

Government of Newfoundland and Labrador
Department of Industry, Energy and Technology
Office of the Minister

FEB 19 2025

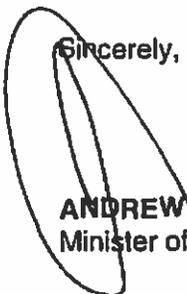
Dwan Street
President, FFAW-UNIFOR
368 Hamilton Ave., PO Box 10, Stn C
St. John's, NL, A1C 5H5
president@ffaw.ca

Dear Ms. *Dwan* Street.

Thank you for your letter of February 4, 2025, regarding renewable energy development for the Newfoundland and Labrador offshore and the establishment of a Fisheries Advisory Committee.

Offshore Renewable Energy (ORE) development in this province will only occur through meaningful engagement with the fishing industry, as well as with project developers, governments, and other stakeholders. We are still in the early stages of ORE development, and I want to assure you that we will continue our ongoing engagement with the FFAW as we advance work on this new industry. My department also sees the value of establishing a Fisheries Advisory Committee to enhance communications with fishers and we are happy to continue discussions to determine the best approach to operationalize such a group.

I look forward to continuing to work with you on these and other areas of interest to your members.

Sincerely,


ANDREW PARSONS, KC
Minister of Industry, Energy and Technology



FFAW | UNIFOR
Fish, Food & Allied Workers

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President

JASON SPINGLE
Secretary-Treasurer

February 4, 2025

Honourable Andrew Parsons, KC
Minister of Industry, Energy, and Technology

Nena Abundo
Executive Director, Oil and Gas

Susan Wilkins
Executive Director, Renewable Energy

Nadine Avery Vey
Secretary to Associate Deputy Minister

Nadine,

On December 10th, 2024, FFAW-Unifor met with Minister Parsons and company to discuss prospective plans for the Newfoundland offshore and renewable energy development. At this meeting, FFAW re-emphasized the direct impacts offshore wind energy expansion will have on fish harvesters faced with competition for ocean space and affected by new infrastructure. Further, co-location of the existing commercial fishery and new offshore wind energy represents a major concern for the Newfoundland and Labrador fishing industry. This feedback was well received, as it has been in previous conversations with the Department of IET. Both parties agreed to actively strive for respectful and productive co-existence.

It was recognized at this December meeting, and in previous engagements with the Department of IET throughout 2024, that the Canada-Nova Scotia Offshore Petroleum Board (C-NSOPB) has a Fisheries Advisory Committee for fisheries consultations, yet no such entity exists in NL or within the Canada-Newfoundland and Labrador Offshore Petroleum Board (C-NLOPB). Currently, we have no mechanism in our province to support dedicated, imperative consultations for offshore wind and fishing industries despite an acknowledged need for such.

FFAW is appreciative of the positive reception from both the Government of NL and the C-NLOPB to work collaboratively to find a solution to fill this engagement opportunity gap. In previous meetings with the C-NLOPB in 2024, representatives affirmed the need for this forum as well. Given the intricacies of renewable energy jurisdictions, the choice needs to be made and made swiftly

on who will house this forum, the Provincial government or the Offshore Petroleum Board. These critical conversations are already taking place in Nova Scotia and strategic, proactive planning in NL will only strengthen the future and coexistence potential of our ocean industries.

The fishing industry must be deeply engaged in the earliest phases of offshore renewable energy to increase trust and understanding and to ensure all avoidance mitigations can proceed.

FFAW is eager to work collaboratively with the Department of IET and the Government of NL to ensure a just transition to renewable technologies while balancing and protecting natural resources and our longstanding successful, fishing industry. We appreciate routine and regular communications with the Department, as continued, meaningful engagements instil confidence and awareness of mutual industries. We look forward to future discussions and hope they can occur in a timely manner by way of a Fisheries Advisory Committee.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Dwan Street', is positioned above the typed name.

Dwan Street
President, FFAW-UNIFOR

FFAW UNIFOR ADDRESS | Standing Senate Committee on Energy, the Environment and Natural Resources
Bill C-49
5 minutes

Thank you, Mr. Chair. On behalf of our over 14,000 members from Newfoundland and Labrador, thank you for the opportunity to address the Standing Senate Committee on Bill C-49.

The Fish, Food, and Allied Workers Union represents every inshore fish harvester in our province, encompassing approximately 3,000 owner-operator enterprises and their over 7,000 crew members.

As the Union representing fish harvesters and processing workers, FFAW is a primary advocate for the economic and social growth of coastal communities throughout our province.

FFAW, too, does not support the haste with which the Senate is expected to process this Bill. Informed and responsible decision-making takes time, and one would expect this to be especially true for a bill intended to pioneer a new industry. In FFAW meetings with our Provincial Government, they too have expressed concerns with Federal pressure to pursue this industry too quickly.

Our inshore fishery contributes over \$1 billion annually to the provincial economy from a renewable and historically significant marine resource. Offshore wind energy expansion has a direct impact on fish harvesters who will be faced with competition for ocean space and absolutely affected by new infrastructure. In the absence of the appropriate consultation framework not currently built into this bill for adherence, undue conflict amongst fisheries stakeholders, other ocean user-groups, future investors, and developers of offshore wind is inevitable.

The fishing industry is sustainable, increasingly profitable, and successful. Yet, year after year, fishing activities and patterns are forced to change because of new developments offshore. This is frustrating for commercial harvesters who regularly see oil and gas related expansion proceed without their due consideration. Substantial ocean real estate has already been claimed in the Jeanne d'Arc Region by oil companies; four oil fields within this region are located on traditional prime cod fishing grounds. There is no economic opportunity to fish

in areas the oil industry has acquired offshore, and our members are justifiably concerned offshore wind will even further reduce their economically viable areas.

FFAW has been thoroughly engaged in the ongoing Regional Assessment for Offshore Wind. However, this Assessment so far, and near completion, is deeply flawed and consultation and community engagement wholly insufficient.

The Regional Assessment Committee has no mandate to consider the impacts of subsea cable to shore systems, the increased navigational challenges and dangers associated with transiting through wind farms with proven radar deficiencies and will give no consideration to the lost livelihoods of commercial fishers when their designated fishing areas are completely abandoned due to offshore wind. Fishing industry representatives in the US have publicly stated offshore wind farms in their jurisdictions become de facto exclusionary zones for commercial fishing and, in their cases, improper consideration and rushed legislation all but guarantees litigation.

The impossible timelines imposed on the Regional Assessment Committee and government Committees are rushed and dismissive and do not allow sufficient time to appropriately engage and thoughtfully consider. The RA mandate renders itself ineffective in capturing fisheries impacts such as historical fishing patterns and long-term oceanographic changes. FFAW members in small, coastal communities will be disproportionately, negatively affected if their fishing grounds are displaced by offshore wind, and without a robust plan for potential workforce transitions, these communities risk collapse.

While we appreciate the acceptance of amendments thus far acknowledging fisheries, more robust safeguards and assurances are necessary. The impacts of offshore wind development are already being felt by our membership. Fish harvesters are anxious about the unknown longevity of their industry. Young harvesters are apprehensive about the risk of purchasing new enterprises. I myself, have significantly reduced bandwidth since taking on this offshore wind file and it leaves less resources available for other equally important fisheries issues.

Our Province is unique in many ways, perhaps the most prolific being our geography as an island. Our rural, coastal communities have relied on fish harvesting to provide sustenance and economic stability for generations, and this

practice continues as a vibrant industry. As government officials, you have a fundamental responsibility to protect the valuable resources. Insights and experiential knowledge provided by fish harvesters will serve as an invaluable resource throughout the planning process to mitigate risk and to ensure sound implementation. It is therefore reckless and irresponsible to jeopardize rural reliance on renewable seafood resources given the vast uncertainty of potential negative effects.

FFAW has met with existing players in offshore wind to better understand the realities of fisheries interactions. We met with Xodus Group, a global energy consultancy, with interests in Boston and Scotland. Their take home message was entirely in hindsight, explaining that they had done things wrong, and in Canada we have a great opportunity to learn from their mistakes. They emphasized the fishing industry must be deeply engaged in the earliest phases of offshore wind to increase trust and understanding and to ensure all avoidance mitigations can proceed. The fishing industry will be the most disrupted, as the succession of the industry relies on sustainable practices that preserve biodiversity and sensitive habitat conditions. Subversion of this habitat, which is often irrevocable, will directly cause the displacement of valuable fisheries.

FFAW in its representation of the owner-operator fishery in Newfoundland and Labrador, had not been consulted or engaged by governments, or otherwise, on the proposed legislation in question ahead of the bill's First Readings. Since sounding this alarm, there has been a reactive approach from Federal and Provincial governments to engage with our membership. The fishing industry cannot and will not be an afterthought.

FFAW does not oppose the development of renewable industries; our Union opposes any harmful impacts imposed on our industry. We do fear the Committee may pass this Bill without sufficient and necessary consultations. As a key stakeholder, FFAW is committed to all consultation that will be required moving forward in support of a just transition to greener, less fossil fuel dependent technologies, however, the growth of one industry cannot be at the expense of another. We will support productive partnerships and a goal of coexistence that thoughtfully and meaningfully consider fisheries as a priority. Thank you.