

# Offshore Wind Call for Information NS25-1R

## What We Heard Report

Prepared by:  
Canada-Nova Scotia Offshore Energy Regulator

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**CNSOER**  
CANADA - NOVA SCOTIA OFFSHORE ENERGY REGULATOR

The Canada-Nova Scotia Offshore Energy Regulator (CNSOER) is an independent joint agency created by the Governments of Canada and Nova Scotia. The CNSOER is the independent lead and lifecycle regulator, responsible for the regulation of offshore energy development in the Canada-Nova Scotia offshore area. To learn more about who we are and what we do, [visit our website](#).

The CNSOER respectfully acknowledges that our office in Dartmouth, Nova Scotia, is located in Mi'kma'ki, the traditional and ancestral territory of the Mi'kmaq people, who have lived on this territory for millennia.

The CNSOER also recognizes the people of African descent and the members of the more than 50 African Nova Scotia communities throughout our region who have made Nova Scotia their home for more than 400 years.



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## Introduction

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On April 11, 2022, the Governments of Canada and Nova Scotia [announced their intention to expand the CNSOER's mandate](#) to include the regulation of offshore renewable energy development. Effective January 31, 2025, the *Accord Acts* were amended to expand the Canada-Nova Scotia Offshore Petroleum Board's (CNSOPB) mandate to include offshore renewable energy. On this date, the [CNSOPB became the CNSOER](#).

On July 29, 2025, governments jointly identified suitable potential areas for future offshore wind Calls for Bids and possible developments, known as Wind Energy Areas (WEAs). The [government designated WEAs](#) provided clarity and direction on where future offshore wind Calls for Bids could happen, where future Submerged Land Licences could be issued, and where offshore wind developments could proceed. The precise location of future offshore wind Calls for Bids, Submerged Land Licences and subsequent wind developments within these WEAs is determined by additional steps within the CNSOER's land tenure and authorization processes.


The process of identifying WEAs began in 2023 when governments appointed an independent assessment committee to undertake a [Regional Assessment of Offshore Wind Development in Nova Scotia](#). This committee's final report was published on January 23, 2025. Their report identified eight potential development areas separated into two tiers based on "the overall understanding of conditions within each area and uncertainties for potential offshore wind development to take place." In March of 2025, as a further step toward designating WEAs, governments requested public feedback on the five modified Tier 1 areas identified within the Regional Assessment of Offshore Wind Development in Nova Scotia final report. This request for feedback was supported by two documents: an [Offshore Wind Energy Areas Summary](#) and an [Offshore Wind Energy Areas Discussion Paper](#).

On September 18, 2025, the [CNSOER received joint Strategic Direction from governments](#) to formally initiate the process to issue a Call for Bids for offshore wind within the Canada-Nova Scotia offshore area. Strategic Direction from the federal and provincial Ministers is part of the [offshore renewable energy land tenure process](#) and occurs prior to the CNSOER commencing the offshore wind Call for Information and Prequalification processes.

The CNSOER [announced offshore wind Call for Information NS25-1R and offshore wind Prequalification NS25-1R](#) on October 18, 2025, two offshore renewable energy land tenure processes that remained open for 90 days until January 13, 2026. As part of the offshore wind Call for Information NS25-1R, the CNSOER welcomed feedback on the governments' Strategic Direction letter and invited Indigenous groups and rights holders, the fishing sector, industry, governments, the public, and other interested stakeholders to provide their feedback on:

- The WEAs being considered and the location(s) of potential parcel(s) within these WEAs.
- The possible evaluation criteria to be used as part of the Call for Bids process.
- The possible draft terms and conditions for a Submerged Land Licence.

This What We Heard report summarizes key themes captured during the offshore wind Call for Information NS25-1R public engagement. The CNSOER will use the feedback received to prepare an offshore renewable energy recommendation to assist the federal and provincial Ministers in making an offshore wind Call for Bids and determining the terms and conditions of a Submerged Land Licence.



# Approach to Engagement

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## Engagement Structure

The CNSOER conducted public engagement opportunities for offshore wind Call for Information NS25-1R for a 90-day period between October 16, 2025, and January 13, 2026.

Offshore wind Call for Information NS25-1R public engagement activities included:

- Letters sent by email to Indigenous groups and rights holders in Nova Scotia, Prince Edward Island, New Brunswick, Newfoundland and Labrador, and Quebec, with reminders sent to each group.
- Emails sent to CNSOER contact lists, including Indigenous communities, the CNSOER Fisheries Advisory Committee, those who have subscribed to receive emails from the CNSOER, and municipalities throughout Nova Scotia.
- Small group meetings with Indigenous groups and rights holders, the CNSOER Fisheries Advisory Committee, the fishing sector and industry.
- External presentations to industry.
- Information posted on the CNSOER website and a news release.
- Information and reminders posted on CNSOER social media accounts.
- Providing an opportunity for public written feedback via a [digital feedback form](#).
- A CNSOER [public information webinar](#) that included information provided to participants as well as space to ask questions prior to and during the webinar.

## Engagement Opportunities – Method-specific

### Written Feedback

As part of the offshore wind Call for Information NS25-1R, the CNSOER invited Indigenous groups and rights holders, the fishing sector, industry, governments, the public, and other interested stakeholders to provide written feedback on the details shared in the Strategic Direction letter from governments.

During offshore wind Call for Information NS25-1R, the CNSOER sought feedback on the possible terms and conditions of the Submerged Land Licence, coexistence, fisheries compensation, Participant Funding Program, and an opportunity to provide general feedback.

Written feedback was submitted for offshore wind Call for Information NS25-1R using a [digital feedback form](#).

### Virtual and In-Person Meetings

Throughout the offshore wind Call for Information NS25-1R process, CNSOER staff met with or presented to, in some capacity, all identified groups.

### Public Information Webinar



The CNSOER hosted [a public information webinar](#) that took place on Tuesday, November 25, 2025.

The purpose of the public information webinar was to share details about the offshore wind Call for Information NS25-1R process with Indigenous groups and rights holders, the fishing sector, industry, governments, the public, and other interested stakeholders. Attendees had an opportunity to ask questions to CNSOER staff during the webinar. This event was recorded and posted on [our website](#) for future reference.

### **Parcel Identification**

The CNSOER also sought information on possible parcel locations within the government designated WEAs. There were three WEAs identified by governments in their Strategic Direction letter: Sydney Bight, Middle Bank, and French Bank.


People were asked to nominate an area within the WEAs noted in Appendix C of the Strategic Direction letter for the CNSOER to consider, following instructions described in the [offshore wind nomination form](#).

### **Engagement Opportunities – Stakeholder-specific**

More than 35 smaller group meetings for specific topics occurred with CNSOER staff between October 16, 2025, and January 13, 2026, including discussions with Indigenous groups and rights holders, the fishing sector, industry, supply chain, energy organizations, federal and provincial government departments, environmental organizations, among others, on topics including, but not limited to, introductory meetings, process overviews, the CNSOER's regulatory role, marine protected areas, global market updates, fishing data, and transportation and infrastructure.

Below is a summary of official information sessions and webinars that occurred during the offshore wind Call for Information NS25-1R process:

- Indigenous groups and rights holders:
  - CNSOER staff notified Indigenous groups throughout Nova Scotia, Prince Edward Island, New Brunswick, Newfoundland and Labrador, and Quebec who were informally identified by the governments' Crown Oversight Committee with respect to offshore wind Call for Information NS25-1R. This was done through individually emailed letters with follow-up occurring 30 days later. The correspondence included information about the offshore wind Call for Information NS25-1R process, the Participant Funding Program specific to offshore wind Call for Information, and engagement opportunities offered to Indigenous groups and rights holders during the process.
  - CNSOER staff met with and provided a presentation to the Atlantic Policy Congress of First Nation Chiefs Secretariat and the Kwilmu'kw Maw-klusuaqn (KMK). The presentations included an overview of the offshore wind land tenure process, the offshore wind Prequalification NS25-1R process, the offshore wind Call for Information NS25-1R process, and the Participant Funding Program offered during the offshore wind Call for Information NS25-1R process and in the future.
  
- Fishing sector:

- CNSOER staff hosted a dedicated Fisheries Advisory Committee (FAC) and fishing sector information session on October 27, 2025, and provided attendees with information on an overview of the offshore wind land tenure process, the offshore wind Prequalification NS25-1R process, the offshore wind Call for Information NS25-1R process, and the Participant Funding Program offered during the offshore wind Call for Information NS25-1R process and in the future.
  - A meeting took place on November 13, 2025, with Area 22 crab fishing representatives from the Sydney Bight area.
  - On November 19, 2025, CNSOER staff provided similar information to the FAC during their regular FAC meeting and answered questions in relation to the offshore wind Call for Information and Prequalification NS25-1R processes.
  - On January 6, 2026, during a regular FAC meeting, CNSOER staff answered questions related to the closing of the offshore wind Call for Information NS25-1R.
- Government – Municipalities:
    - CNSOER staff met virtually with the Nova Scotia Federation of Municipalities on December 17, 2025. The presentation included an overview of the offshore wind land tenure process, the offshore wind Prequalification NS25-1R process, the offshore wind Call for Information NS25-1R process, community benefits and the Participant Funding Program offered during the offshore wind Call for Information NS25-1R process and in the future.
    - As a result of this meeting, CNSOER staff held a virtual follow-up meeting with the Cape Breton Regional Municipality (CBRM) on January 9, 2026. The same presentation was provided to the CBRM mayor, senior staff members, and councilors.
- Industry:
    - On December 2, 2025, CNSOER's Director, Resources and Rights, presented to Marine Renewables Canada as part of their Ask the Expert webinar series. Kris Kendell provided attendees with an overview of the offshore wind land tenure process, the offshore wind Prequalification NS25-1R process, and the offshore wind Call for Information NS25-1R process and answered questions. Attendees of this webinar were primarily industry.
- General:
    - On November 25, 2025, CNSOER hosted a public information webinar. CNSOER's Director, Resources and Rights, Kris Kendell, and CEO, Christine Bonnell-Eisnor, presented the information, while Advisor, Communications, Colleen Fiske, facilitated the meeting. The presentation included an overview of the offshore wind land tenure process, the offshore wind Prequalification NS25-1R process, the offshore wind Call for Information NS25-1R process, and the Participant Funding Program offered during the offshore wind Call for Information NS25-1R process. The public information session was recorded, posted on the CNSOER website, shared with all registrants, and shared on CNSOER social media channels. A total of 205 registrations were submitted, with 137 in attendance for the webinar. This event was recorded and posted on the CNSOER website for future reference.
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# Purpose, Methodology, and Format of the What We Heard Report

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## Purpose of the What We Heard Report

The purpose of the offshore wind Call for Information NS25-1R What We Heard report is to transparently document and synthesize feedback received through the offshore wind Call for Information NS25-1R process. This report will demonstrate how input from Indigenous groups and rights holders, the fishing sector, industry, governments, the public, and other stakeholders was collected, considered, and reflected in decision-making, without advocating for a specific outcome. This report is intended to illustrate the themes in each of the ten questions asked through the Call for Information digital feedback form.

The offshore wind Call for Information NS25-1R What We Heard report:

- Summarizes key themes and perspectives expressed by Indigenous groups and rights holders, the fishing sector, industry, government, the public, and other stakeholders.
- Provides transparency and accountability, as well as builds trust and credibility, by showing that feedback was accurately captured.
- Creates a shared record of themes, issues, concerns, suggestions, and areas of alignment or divergence raised through the submissions.
- Supports informed decision making by distilling complex and sometimes conflicting input into structured, accessible insights for use by the CNSOER and the federal and provincial governments.

*It is important to note that the What We Heard report does not evaluate, prioritize, or respond to feedback in detail; rather it focuses on accurately reflecting and summarizing feedback from Indigenous groups and rights holders, the fishing sector, industry, governments, the public, and other interested stakeholders, and setting the foundation for subsequent analysis, actions, and next steps.*

## Methodology and Format of the What We Heard Report

CNSOER staff undertook a thematic analysis of all information received through written feedback, virtual and in-person meetings, the virtual public information webinar, and parcel identification to compile the offshore wind Call for Information NS25-1R What We Heard report. It must be emphasized that every submission, comment, letter, and attachment was read in entirety by both CNSOER staff and Members of the Regulator.

Feedback was sorted into ten categories: one for each of the questions asked in the offshore wind Call for Information NS25-1R written feedback digital form. CNSOER staff were assigned categories based on their subject matter expertise. Staff subsequently conducted a review of each category to identify and summarize the key themes.

AI, specifically Microsoft Copilot, was also used to assist in synthesizing the submissions received and to help identify themes for inclusion in the What We Heard report. It assisted by condensing and organizing detailed feedback into clear, theme-based summaries that reflected the substance of what respondents said, while preserving neutrality and avoiding interpretation beyond the content. It also helped to distinguish feedback by respondent type – Indigenous groups and rights holders, the fishing sector, industry, governments, and other interested stakeholders – and ensured themes were grounded directly in what was expressed, rather than inferred. Draft outputs generated by Microsoft Copilot were thoroughly reviewed and refined by CNSOER staff to confirm accuracy, completeness, and appropriate tone before being finalized.

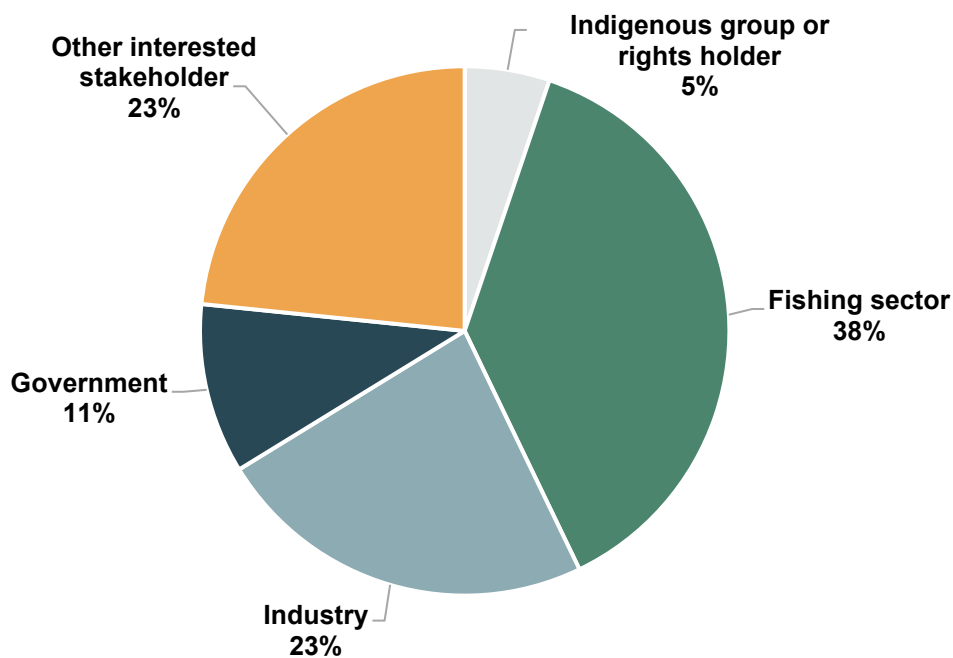
## Overview of Respondents

### Summary of Responses for Offshore Wind Call for Information NS25-1R Written Feedback

The offshore wind Call for Information NS25-1R was open for written comment from October 16, 2025, to January 13, 2026. The CNSOER received 77 written feedback submissions – 71 responses via the digital feedback form and six responses via email.

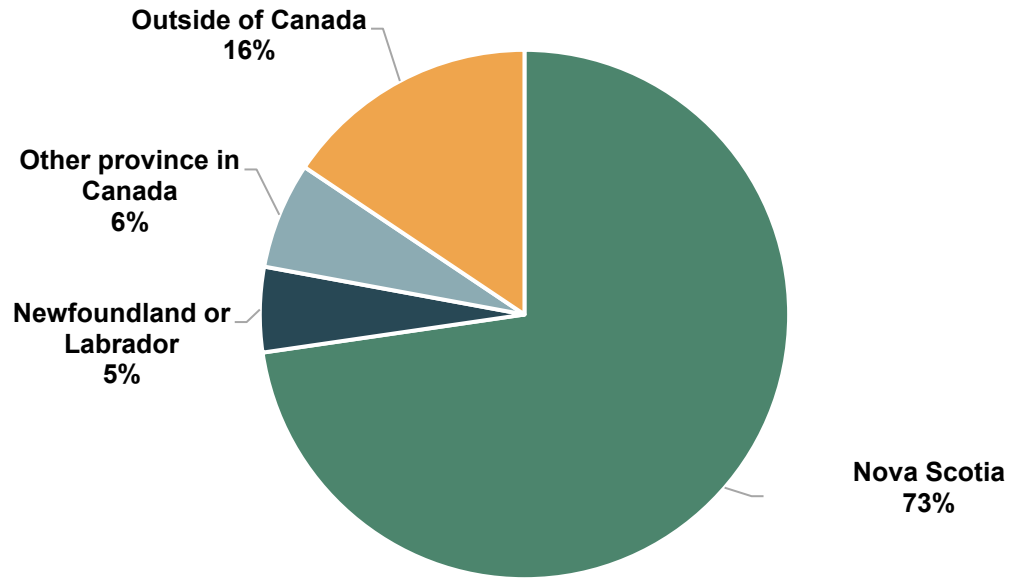
As Figure 1 shows, the highest number of respondents identified themselves as those from the fishing sector, closely followed by industry and other interested stakeholders. People who responded and identified themselves as other interested stakeholder further self-identified as public; energy or technical research; environmental law charity; environmental registered charity; firm; environmental non-profit; or conservation group.

- Indigenous group or rights holder: 4 (5% of responses)
- Fishing sector: 29 (38% of responses)
- Governments: 8 (11% of responses)
- Industry: 18 (23% of responses)
- Other interested stakeholder: 18 (23% of responses)



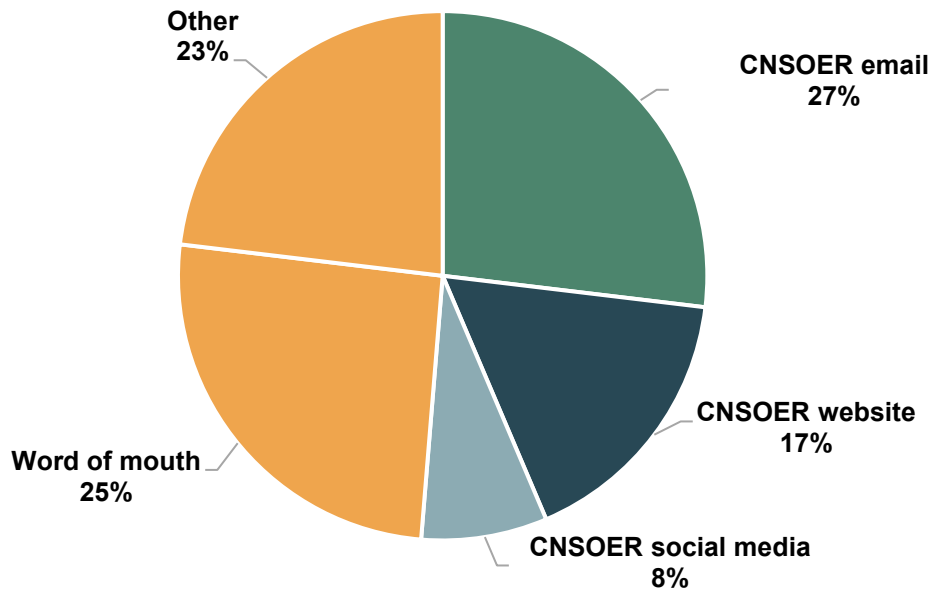
**Figure 1 – Identified respondent groups**

Most respondents reside in Nova Scotia, with some from Newfoundland and Labrador, other provinces in Canada, and outside of Canada also represented. No respondents indicated they reside in New Brunswick or Prince Edward Island. Figure 2 highlights where respondents indicated they reside.



**Figure 2 – Respondent location**

The CNSOER used a variety of methods to inform Indigenous groups and rights holders, the fishing sector, industry, governments, the public, and other interested stakeholders of the opportunity to submit feedback for consideration during the offshore wind Call for Information NS25-1R process. Figure 3 highlights how respondents indicated they heard about the opportunity to provide feedback.



**Figure 3 – How respondents were informed**

## What We Heard

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This What We Heard report is organized by the ten categories and subsequent key themes for each that emerged across all engagement activities during the offshore wind Call for Information NS25-1R process. Thematic sections synthesize input from all respondents to highlight areas of shared experience, concern, and opportunity, while also noting where perspectives differed. Within each theme, respondent-specific insights are identified to ensure diverse viewpoints are accurately reflected. This approach emphasizes overall patterns and insights while maintaining transparency about the range of perspectives heard.

### > Identifying Parcels within the Government-designated Wind Energy Areas

Across submissions, respondents provided extensive and detailed feedback on the identification of WEAs and the factors that should guide parcel design for offshore wind development in Nova Scotia. There was broad agreement that parcel identification is a pivotal decision point with long-term implications for Indigenous rights, fisheries, environmental protection, navigation safety, infrastructure planning, and public confidence in the regulatory process. While respondents expressed varying levels of support for offshore wind development, there was strong alignment on the need for precaution, meaningful engagement, avoidance of high-conflict areas, and a phased, learning-based approach that reflects data limitations and cumulative effects.

#### Theme: Protection of Indigenous and Treaty Rights and Meaningful Engagement

Respondents emphasized that offshore wind planning and parcel identification occur within Mi'kma'ki and directly intersect with constitutionally protected Indigenous and treaty rights. Feedback underscored that parcel design decisions have the potential to impair these rights if undertaken without meaningful engagement, free, prior, and informed consent, and early involvement of Indigenous rights holders. Many submissions stressed that respecting Indigenous rights must be treated as a foundational requirement of the parcel identification process, rather than a consideration to be addressed later at the project stage.

- **Indigenous groups and rights holders** consistently emphasized that the WEAs overlap with waters used to exercise treaty-protected fishing rights, including moderate-livelihood fisheries. Respondents stressed that parcel identification must avoid impairing current and future fishing activity and assume that Indigenous fisheries will expand over the licence term as access, capacity, and species diversity continue to grow. Submissions highlighted concerns about displacement from culturally important fishing areas, impacts to sacred sites and benthic habitats, and the need for early cultural heritage assessments.

Throughout submissions, it was emphasized that compensation is not an adequate substitute for maintaining access to fishing grounds. Where overlap cannot be avoided, submissions called for co-design of parcel layouts, turbine spacing, and navigation corridors to preserve access and safety. Several submissions stressed the importance of Nation-to-Nation engagement frameworks and governance approaches that reflect Mi'kmaq laws, values, and stewardship systems, rather than relying solely on conventional environmental or planning tools.

- **The fishing sector** broadly supported the need to respect Indigenous rights and emphasized that

commercial and Indigenous fisheries often rely on the same marine spaces. Several submissions noted that inadequate engagement with Indigenous rights holders risks compounding conflict and undermining coexistence for all ocean users. Fishers emphasized the importance of early, good-faith consultation with Indigenous communities prior to parcel finalization.

- **Industry** submissions recognized Indigenous engagement and rights protection as essential to project certainty, regulatory durability, and social acceptance. Early engagement with Indigenous communities was framed as critical to informing parcel constraints and reducing downstream risk.
- **Government** submissions acknowledged Indigenous rights as a required consideration in parcel design and emphasized collaboration, science-based planning, and integration of Indigenous use alongside other ocean users. Submissions generally framed Indigenous engagement as an essential input into marine spatial planning and cumulative effects assessment.
- **Other interested stakeholders** reinforced the importance of Indigenous engagement, particularly within precautionary and ecosystem-based marine spatial planning approaches. Several emphasized that Indigenous knowledge should be treated as a distinct and essential evidence base.

### Theme: Fisheries Protection, Access, and Displacement Risk

Respondents consistently raised concerns that the WEAs overlap with long-established and highly productive fishing grounds. Feedback emphasized that parcel identification has the potential to displace fishing activity, reduce access to functional fishing space, and create cumulative economic, safety, and sustainability impacts for coastal communities. Many submissions stressed that fisheries protection should prioritize avoidance of active fishing areas and reflect the dynamic and evolving nature of fishing activity.

- **Indigenous groups and rights holders** echoed concerns about fisheries displacement but framed them through treaty rights, moderate-livelihood fisheries, and long-term stewardship responsibilities. Submissions emphasized the need to preserve space for future expansion of Indigenous fisheries and to account for climate-driven shifts in species distribution.
- **The fishing sector** emphasized that the WEAs are intensively used by multiple fleets, gear types, and species, and form the economic backbone of many coastal and rural communities. Fishers stressed that fishing activity is spatially and temporally dynamic and cannot be accurately captured using static historical landings data alone. Concerns focused on displacement, crowding into adjacent areas, reduced catch rates, safety risks, and long-term impacts on fishery sustainability.

Submissions repeatedly stated that parcel identification should not proceed before completion of multi-year, fisheries-specific baseline research and direct engagement with harvesters to validate fishing footprints and operational realities. Many fishers emphasized that compensation, while necessary where impacts are unavoidable, is secondary to maintaining access to fishing grounds.

- **Industry** submissions acknowledged that interactions with fisheries are unavoidable and emphasized the importance of early identification of conflicts, buffers, navigation corridors, and clear parcel boundaries to provide certainty for both developers and fishers.
- **Government** submissions recognized fisheries as a critical parcel-design factor and emphasized

balancing fisheries with offshore wind development through marine spatial planning, surveys, and cumulative effects assessment. Submissions focused on incorporating fisheries considerations into broader decision-making frameworks.

- **Other interested stakeholders** supported strong fisheries protection through precautionary parcel design, avoidance of sensitive areas, and transparent compensation frameworks where displacement cannot be avoided.

### Theme: Data Gaps, Uncertainty, and the Need for Precaution

Many submissions highlighted significant data gaps and uncertainty affecting parcel identification, including incomplete fisheries data, limited understanding of wildlife use, seabed conditions, and future climate-driven changes. Respondents cautioned that proceeding with parcel boundaries under current uncertainty risks embedding long-term conflict and undermining confidence in the regulatory process. A precautionary and adaptive approach was widely supported.

- **Indigenous groups and rights holders** emphasized that Mi'kmaq knowledge must be treated as a distinct and equally valid evidence base and not inferred through generalized datasets. Submissions stressed that failure to meaningfully incorporate Indigenous knowledge early undermines both accuracy and legitimacy.
- **The fishing sector** highlighted gaps in data related to small-vessel fleets, mobile species, historically important fishing grounds, and recently reopened fisheries. Many stressed that existing datasets systematically underrepresent fishing activity and risk unfair displacement.
- **Industry** submissions recognized uncertainty but emphasized the need for parcels to be sufficiently large and flexible to accommodate exclusions identified during later site investigations, framing flexibility as essential to project viability.
- **Government** submissions acknowledged uncertainty and supported precautionary, risk-based parcel design, adaptive management, and flexibility to adjust parcels as new information becomes available.
- **Other interested stakeholders** emphasized transparency regarding data sources, limitations, and uncertainty, and supported coordinated regional monitoring to improve cumulative effects understanding.

### Theme: Environmental and Ecological Protection

Environmental and ecological protection emerged as a central concern across submissions. Respondents emphasized that many of the banks and nearshore areas identified for offshore wind are also ecologically productive and support biodiversity, fisheries, and culturally important species. There was broad support for applying the mitigation hierarchy, with avoidance of sensitive habitats prioritized at the parcel-design stage.

- **Indigenous groups and rights holders** emphasized the interconnectedness of ecological protection and cultural values, cautioning against assumptions that conventional conservation tools fully reflect Indigenous priorities and stewardship responsibilities.

- **The fishing sector** focused on habitat protection as it relates to stock productivity, spawning areas, and long-term fishery sustainability, raising concerns about seabed disturbance, cabling effects, and cumulative impacts alongside existing marine protected areas.
- **Industry** generally supported avoidance of sensitive habitats but emphasized the need for clearly mapped environmental constraints to inform bids and project design.
- **Government** submissions highlighted wildlife risk screening, proximity to protected areas, and cumulative effects as key parcel-design considerations.
- **Other interested stakeholders** strongly advocated for ecosystem-based planning, precautionary buffers, and cumulative impact assessment across WEAs.


### Theme: Navigation, Safety, and Marine Traffic

Safety and navigation concerns were raised across submissions, particularly regarding increased marine traffic, constrained maneuverability, and interactions between fishing vessels, shipping, and offshore wind infrastructure. Respondents emphasized that navigation and safety considerations must be addressed early through parcel layout and corridor design.

- **Indigenous groups and rights holders** linked safety concerns to the ability to safely exercise fishing rights and maintain access to traditional fishing areas.
- **The fishing sector** emphasized risks related to gear conflicts, ghost gear, increased vessel traffic, and safety hazards, particularly in heavily trafficked areas such as Middle Bank and nearshore Sydney Bight.
- **Industry** and **Government** submissions emphasized the importance of navigation corridors, buffers, and alignment with existing vessel routes as core parcel-design parameters.

### Theme: Phasing, Scale, and Learning-Based Development

Many respondents emphasized that early offshore wind development should proceed cautiously and be treated as a learning phase. Submissions highlighted the importance of assessing lessons learned before expanding capacity, identifying additional parcels, or increasing development scale.

- **Indigenous groups and rights holders** strongly supported phased development tied to demonstrated coexistence and adaptive management.
  - **The fishing sector** emphasized starting small, assessing real-world impacts, and avoiding large-scale build-out before coexistence measures are proven.
  - **Industry** submissions vary, with some advocating for larger parcels to ensure commercial viability but still acknowledging the value of regulatory clarity and phased expansion.
  - **Government** submissions often referenced adaptive management and future scenario planning.
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### Theme: Infrastructure, Ports, and Onshore Implications

Submissions emphasized that offshore parcel design cannot be separated from onshore infrastructure considerations, including ports, transmission corridors, landfalls, and grid capacity. Respondents highlighted both potential impacts and economic opportunities associated with enabling infrastructure.

- **Indigenous groups and rights holders** sought clarity on onshore impacts and benefits, including local use of power and infrastructure siting, further stating that associated impacts must be considered as part of parcel design and project planning.
- **The fishing sector** focused on avoiding additional displacement from cable routes and shore-based impacts.
- **Industry** submissions strongly emphasized proximity to ports and grid as essential to feasibility and cost control.
- **Government** submissions framed infrastructure as part of integrated marine and energy planning.

### Theme: Compensation, Equity, and Public Benefit

Respondents recognized that where impacts cannot be avoided, compensation frameworks must be clear, fair, and transparent. At the same time, many questioned whether early offshore wind development delivers sufficient public benefit to justify impacts to existing industries and communities.

- **Indigenous groups and rights holders** emphasized that compensation cannot replace access or rights and that equity must be addressed through avoidance, co-design, and governance.
- **The fishing sector** reiterated that harvesters want to continue fishing and that compensation should only apply where impacts are unavoidable.
- **Industry** generally viewed compensation clarity as part of de-risking development and supporting social acceptance.
- **Other interested stakeholders** called for structured, regulator-supported compensation frameworks.

### Theme: Supplemental Information about Government-designated WEAs

In addition to cross-cutting themes, many submissions provided location-specific feedback on the government-identified WEAs. Respondents emphasized that while some issues apply across all areas, the context, intensity of use, sensitivities, and perceived suitability vary significantly by location. The following section summarizes supplemental feedback organized by WEA, reflecting how respondents view each area based on its unique characteristics, uses, and constraints.

#### Sydney Bight WEA



Feedback on the Sydney Bight WEA was extensive and varied, reflecting its proximity to shore, importance to fisheries and Indigenous communities, ecological sensitivity, and strategic relevance for infrastructure and port access. While some submissions identified Sydney Bight as a logical and potentially advantageous location for early offshore wind development, others expressed strong concerns about impacts to fishing activity, Indigenous rights, marine ecosystems, and safety. As a result, Sydney Bight emerged as one of the most contested WEAs in the feedback received.

- **Indigenous groups and rights holders** emphasized that Sydney Bight lies within waters used by Mi'kmaq fishers to exercise treaty-protected fishing rights, including moderate-livelihood fisheries. Respondents highlighted the area's proximity to Mi'kmaq communities in Cape Breton and its importance for lobster, snow crab, scallop, and emerging moderate-livelihood fisheries. Concerns focused on displacement from nearshore fishing grounds, interference with future expansion of Indigenous fisheries, and impacts to culturally important marine and benthic habitats.

Respondents stressed that parcel placement toward the outer edge of the WEA would be necessary to minimize impacts and that parcel boundaries should avoid shallow reefs and sensitive habitats. Submissions emphasized that compensation is not an adequate substitute for maintaining access and that any development in Sydney Bight would require early, meaningful Nation-to-Nation engagement and co-design to protect rights and safety.

- **The fishing sector** was particularly critical of Sydney Bight, frequently describing it as a heavily and continuously fished area that supports inshore and offshore fleets, including lobster, snow crab, halibut, and groundfish. Many respondents stated that there is little to no area within Sydney Bight that is not actively fished and expressed concern that offshore wind development would result in significant displacement, safety risks, and long-term harm to fishing livelihoods.

Concerns included loss of access due to exclusion zones, increased vessel traffic, gear conflicts, ghost gear, and potential impacts to fish stocks from seabed disturbance, electromagnetic fields from cabling, and noise. Several submissions emphasized that Sydney Bight's importance to smaller vessels and its proximity to shore heighten both safety risks and socio-economic impacts. Some fishers questioned whether Sydney Bight should be considered suitable for offshore wind development at all, given its fishing intensity.

- **Industry** generally identified Sydney Bight as a strong candidate for early offshore wind development, citing its proximity to shore, favourable wind resource, suitable water depths for fixed-bottom foundations, and access to existing port and grid infrastructure in the Sydney Harbour area. Several respondents emphasized that Sydney Bight offers advantages in terms of constructability, transmission efficiency, and cost control compared to more distant or deeper areas.

Industry feedback often supported designating at least one commercial-scale parcel in Sydney Bight, typically around 500 MW, while emphasizing the need for flexibility in parcel boundaries to accommodate site investigations, fisheries interactions, navigation corridors, and future expansion. Some submissions cautioned that pushing development into deeper waters to address other constraints could increase project risk and deter experienced developers.

- **Government** submissions focused on specific sensitivities associated with Sydney Bight, particularly its proximity to Cape Breton Highlands National Park and the sensitivity of coastal and seascape

viewscales. Feedback highlighted that offshore wind turbines could remain visible from key park lookoffs at distances beyond 25 kilometres and that larger buffers – potentially greater than 45 kilometres – would be more effective in reducing visual impacts.

Government feedback emphasized that parcel design in Sydney Bight would need to carefully account for visual impacts, turbine height and spacing, proximity to shore, fisheries use, navigation routes, and cumulative effects. Several submissions framed parcel identification as a critical stage for mitigating impacts that may not be fully addressable at the project level.

- **Other interested stakeholders** expressed mixed views on Sydney Bight. Some supported its identification as a WEA based on regional assessment work and infrastructure proximity, while emphasizing the need for precaution due to ecological sensitivity, fisheries use, and proximity to shore. Others questioned whether development in Sydney Bight appropriately balances climate objectives with environmental protection and impacts on existing ocean users.

Several submissions stressed that if development proceeds in Sydney Bight, parcel design must prioritize avoidance of the most sensitive areas, apply precautionary buffers, and be informed by robust data and cumulative effects assessment.

### Middle Bank WEA

Feedback on the Middle Bank WEA focused on its ecological and economic importance as a biologically productive offshore bank that supports multiple active fisheries, as well as its perceived potential for large-scale offshore wind development due to its size and water depths. While some respondents identified Middle Bank as offering flexibility for parcel design and future expansion, many others raised strong concerns about displacement of fishing activity, cumulative impacts, and the risk of treating the area as low-conflict due to data limitations rather than actual use patterns.

- **Indigenous groups and rights holders** emphasized that Mi'kmaq fishers exercise treaty-protected rights within Middle Bank and may expand fishing activity in this area over time. Respondents noted that Middle Bank supports commercial and moderate-livelihood fisheries, including scallop and groundfish, and stressed that parcel identification must preserve access for current and future Indigenous fishing activity.

Concerns were raised about the cumulative effects of large-scale development on Mi'kmaq rights, particularly if multiple parcels or future expansions are contemplated within the same WEA. Indigenous respondents emphasized that parcel design should consider smaller or more flexible parcels, co-designed layouts, and adaptive management approaches that allow impacts to be assessed before additional capacity is added.

- **The fishing sector** consistently described Middle Bank as a highly productive and intensively used fishing area supporting multiple fleets and gear types, including scallop, groundfish, halibut, snow crab, and pelagic species. Fishers emphasized that Middle Bank is not a marginal or low-use area and cautioned against relying on incomplete datasets that may under-represent actual fishing intensity and operational patterns.

Submissions highlighted that Middle Bank functions as an important biological area, including scallop

habitat and potential larval source areas, and that parcel placement could have implications beyond the immediate footprint due to displacement and cumulative effects. Many fishers stressed that large parcels or multiple developments within Middle Bank could significantly constrain fishing activity and safety, particularly given the area's role as a navigation and transit corridor. Several submissions questioned whether Middle Bank should be developed at all before more comprehensive baseline research and engagement are completed.

- **Industry** generally viewed Middle Bank as offering significant potential for offshore wind development due to its size, depth profile, and flexibility for parcel configuration. Several respondents identified Middle Bank as the most adaptable of the WEAs, with the ability to support one or more large-scale projects while accommodating future expansion if designed carefully.

Feedback emphasized the importance of aligning parcel size, orientation, and spacing to manage wake effects, transmission planning, and constructability. Some submissions advocated for larger parcels to improve project economics, while others supported dividing the area into multiple parcels depending on licensing and auction design. Industry generally emphasized the need for early clarity on parcel boundaries and development scenarios to manage risk.

- **Government** submissions identified Middle Bank as one of the WEAs informed by prior regional assessment work and interdepartmental collaboration. Feedback emphasized that parcel design in Middle Bank would need to account for multiple existing ocean uses, including fisheries, fisheries science surveys, navigation routes, and sensitive habitats.

Submissions highlighted the need for site-specific, science-based marine spatial planning and cumulative effects assessment, particularly if more than one parcel or future expansion is contemplated. Some submissions referenced the use of spatial planning tools to identify lower-conflict areas within Middle Bank while balancing technical feasibility.

- **Other interested stakeholders** expressed mixed views on Middle Bank. Some supported its identification as a WEA based on technical suitability and prior assessment work, while emphasizing the need for precaution due to ecological importance and fisheries use. Others questioned whether Middle Bank is appropriate for early development given its biological significance and the concentration of fishing activity.

Several submissions emphasized that if development proceeds in Middle Bank, parcel design must be informed by robust, up-to-date data, apply conservative assumptions about cumulative effects, and prioritize avoidance of the most sensitive and heavily used areas.

## French Bank WEA

Feedback on the French Bank WEA highlighted strong concerns about overlap with established fishing grounds, ecological sensitivity, and the technological and economic uncertainty associated with floating offshore wind. While some respondents supported French Bank as part of a longer-term offshore wind strategy, many cautioned against early development in this area due to high conflict risk, unresolved fisheries concerns, and the need for careful sequencing and learning from other WEAs first.

- **Indigenous groups and rights holders** expressed significant concern regarding parcel identification

within French Bank due to its strong connection to commercial, communal, and treaty-protected Mi'kmaq fisheries. Indigenous submissions emphasized that French Bank is used for moderate-livelihood tuna, swordfish, groundfish, and other fisheries, and that overlap with offshore wind development poses a high risk to Indigenous rights.

Submissions stressed that these concerns have been raised previously with both federal and provincial governments and remain unresolved. Feedback emphasized that engagement on French Bank must occur on a Nation-to-Nation basis and that parcel design must account for cumulative effects, future expansion, and the evolving nature of Indigenous fisheries. Several submissions cautioned that French Bank should not be prioritized until coexistence measures are proven elsewhere.

- **The fishing sector** was particularly critical of French Bank, frequently describing it as overlapping with highly productive fishing grounds, including silver hake, halibut, snow crab, pelagic species, and mobile groundfish fleets. Fishers emphasized that fishing operations in French Bank often require wide vessel movement and drifting patterns, making the area particularly sensitive to spatial constraints imposed by turbine arrays and exclusion zones.

Concerns focused on displacement, limited ability for fishers to shift activity due to management regimes, impacts on spawning areas, and cumulative effects of multiple developments. Several submissions criticized the expansion and renaming of the WEA to include previously protected or high-value fishing grounds and questioned whether French Bank should be considered suitable for development at this stage, particularly given floating wind's higher cost and uncertainty.

- **Industry** presented mixed views on French Bank. Some respondents identified French Bank as offering long-term potential for offshore wind development, particularly due to its size and proximity to existing or decommissioned energy corridors that could support transmission. Others cautioned that floating offshore wind remains less mature and more costly than fixed-bottom development and recommended excluding French Bank from early Calls for Bids in favour of lower-risk areas.

Feedback emphasized the importance of buffers around pipelines, realistic assumptions about floating technology, and alignment with transmission planning. Several submissions stressed that premature development in French Bank could increase risk and undermine investor confidence.

- **Government** submissions generally supported the identification of French Bank as a WEA but emphasized that parcel design must be precautionary and informed by cumulative effects assessment, wildlife risk screening, and integration with broader marine spatial planning objectives. Some submissions highlighted the need to respect buffers around existing infrastructure, such as abandoned pipelines, and to carefully consider interactions with fisheries, marine mammals, and seabirds.

Feedback also emphasized that French Bank is deeper than other areas and would rely primarily on floating offshore wind technology, which introduces additional uncertainty and complexity that must be reflected in parcel design and sequencing.

- **Other interested stakeholders** expressed concern about developing French Bank in early phases, citing ecological sensitivity, fisheries overlap, and cumulative impacts. Some emphasized the

proximity of French Bank to conservation areas and the need for precautionary buffers, while others supported its inclusion only as part of a longer-term, phased offshore wind strategy.

Several submissions stressed that if French Bank is advanced, parcel design must prioritize avoidance of sensitive habitats, robust baseline data collection, and clear justification for why impacts can be managed acceptably.

## ➤ Potential Evaluation Criteria for Bids Submitted as Part of the Offshore Wind Call for Bids Process

Overall, feedback indicated strong interest in the offshore wind Call for Bids process and general support for a structured, criteria-based evaluation framework. At the same time, submissions consistently emphasized that the effectiveness and credibility of the process will depend on clear, transparent, and well-defined evaluation criteria. Respondents highlighted the importance of clearly distinguishing between mandatory requirements and scored criteria, explaining how criteria will be weighted and assessed, and ensuring that evaluation frameworks are proportionate to the early, leasing-stage nature of the process.

Across respondent groups, there was broad agreement that bid evaluation should extend beyond price to include non-price considerations such as technical capability, financial strength, environmental sustainability, coexistence with fisheries and other ocean users, engagement quality, and community benefits. Many submissions stressed that these criteria must meaningfully influence bid outcomes, while also cautioning against placing undue weight on early-stage commitments that cannot yet be substantiated. Engagement, coexistence, and environmental stewardship were identified as particularly important, reflecting the existing uses and ecological value of the offshore area.

While there is broad alignment on the importance of transparency, non-price criteria, engagement, coexistence, and environmental protection, respondents differ in their views on appropriate weighting, sequencing, and readiness. These perspectives underscore the importance of a balanced approach that advances policy objectives, protects existing ocean uses and ecosystems, and supports a credible, investable offshore wind sector.

### **Theme: Transparency, Clarity, and Rigor of Bid Evaluation Frameworks**

Throughout submissions, there was strong emphasis on the need for a clearly defined, transparent, and well-articulated bid evaluation framework. Respondents consistently noted that high-level or illustrative criteria are insufficient to support meaningful participation, credible bid preparation, or public confidence in outcomes. Many emphasized that evaluation criteria must clearly specify whether they are pass/fail, qualitative, or scored; how criteria are weighted relative to one another; and how tradeoffs will be assessed. Without this clarity, submissions warned that bid quality, comparability, and trust in the process could be undermined.

Submissions repeatedly stressed that transparency should extend beyond the identification of criteria to include advanced publication of scoring methodologies, weighting, evaluation thresholds, and, where applicable, evaluation panels or moderation processes. Several respondents highlighted the importance of publishing draft evaluation approaches for public comment prior to finalizing the offshore wind Call for Bids, noting that this is standard practice in other jurisdictions and essential for procedural fairness. There was also

concern that unclear frameworks risk discretionary decision-making, legal challenge, and difficulty demonstrating that socio-economic, environmental, and coexistence considerations meaningfully influence outcomes.

- **Indigenous groups and rights holders** supported transparent frameworks but emphasized that clarity must extend to how Indigenous rights, engagement quality, and reconciliation-related criteria are reflected, weighted, and verified within evaluation processes.
- **The fishing sector** echoed the need for transparency but focused particularly on how fisheries impacts, coexistence, and compensation would be evaluated, expressing concern that without explicit weighting and scoring methods, these issues could be sidelined in favour of technical or economic considerations.
- **Industry** strongly emphasized the need for advance disclosure and predictability, noting that unclear or late-stage changes to criteria, weighting, or scoring undermine proponents' ability to prepare credible, investable bids. Industry respondents generally favoured structured but flexible frameworks that distinguish between threshold requirements and scored criteria, with clear standards for evaluation.
- **Government** feedback highlighted transparency as a means of ensuring consistency, comparability, and regulatory alignment, particularly for environmental and biodiversity-related requirements.
- **Other interested stakeholders** broadly aligned with calls for clarity and transparency, often linking these principles to accountability, public trust, and defensibility of bid outcomes.

### Theme: Weighting and Role of Non-Price Criteria

A dominant cross-cutting theme was strong support for the use of non-price criteria in bid evaluation, paired with detailed discussion about their appropriate weighting, role, and design. Submissions consistently argued that price alone is an insufficient proxy for long-term project success, particularly given the technical, environmental, and social complexity of offshore wind development. Many emphasized that non-price criteria should carry meaningful weight to ensure that project deliverability, environmental protection, coexistence, and community outcomes are not secondary considerations.

At the same time, respondents expressed differing views on how ambitious non-price criteria should be at the leasing stage. Several cautioned against over-scoring early-stage plans or commitments that cannot yet be substantiated, while others argued that without strong weighting, non-price criteria risk becoming symbolic rather than influential. A recurring recommendation was to balance qualitative assessment of intent and experience with enforceable mechanisms that ensure commitments are carried forward post-award.

- **Indigenous groups and rights holders** emphasized that non-price criteria related to engagement, rights recognition, and community benefits must be substantive and influential, not outweighed by price or technical considerations. Criteria assessing community expectations and feedback, socioeconomic considerations, biodiversity protection, adaptive management plans, cultural heritage plans involving Mi'kmaw communities, rights-based engagement plans, and vessel traffic management, should be considered.
- **The fishing sector** supported non-price criteria but argued that fisheries-related considerations

should carry significantly higher weight than currently proposed, given the scale, longevity, and economic importance of fishing activity in Nova Scotia waters.

- **Industry** generally supported non-price criteria weighted in the range of approximately 25% to 35%, with greatest emphasis placed on technical expertise and financial strength. Many cautioned against heavily scoring early-stage community or environmental commitments, preferring experience-based assessments at the bidding stage.
- **Government** perspectives generally supported non-price criteria as tools to advance policy objectives but stressed the importance of clear minimum standards and regulatory consistency.
- **Other interested stakeholders** largely aligned with international practice references, supporting meaningful non-price weighting to advance environmental, social, and economic objectives beyond cost efficiency.

### Theme: Engagement, Rights Recognition, and Social Licence

Engagement emerged as a foundational theme across submissions, with widespread agreement that meaningful, early, and ongoing engagement with affected communities and ocean users is essential to project success. Many submissions stressed that engagement should be evaluated not as a procedural checkbox, but as a demonstrated capability grounded in past experience, documented outcomes, and accountability mechanisms. There was concern that high-level engagement plans, without evidence of effectiveness or enforceability, are insufficient at the bidding stage.

Submissions also highlighted the importance of distinguishing between different types of respondents within engagement criteria. Several emphasized that Indigenous Nations must be recognized as rights holders rather than grouped with general stakeholders, and that this distinction must be reflected explicitly in evaluation design, weighting, and governance. Engagement was repeatedly linked to social licence, risk mitigation, and long-term project viability.

- **Indigenous groups and rights holders** strongly emphasized rights-based engagement, co-development of criteria, and Indigenous participation in evaluation and governance, including representation on evaluation committees. Engagement quality, outcomes, and respect for Indigenous knowledge were viewed as central, not supplementary.
- **The fishing sector** emphasized engagement that is operational, evidence-based, and grounded in real understanding of fisheries activity, rather than abstract consultation processes.
- **Industry** generally supported engagement criteria but cautioned against scoring premature commitments, preferring assessments based on past performance and demonstrated capability.
- **Government** feedback supported engagement as a core criterion but emphasized alignment with regulatory processes and clarity on expectations.
- **Other interested stakeholders** reinforced engagement as essential to trust, inclusivity, and long-term acceptance, particularly for underserved or historically excluded groups.

### Theme: Coexistence with Fisheries and Existing Ocean Users



Coexistence with fisheries was one of the most prominent and detailed themes across submissions. Respondents repeatedly emphasized that Nova Scotia's offshore waters are heavily and diversely used, particularly by commercial fisheries, and that bid evaluation must meaningfully assess proponents' ability to avoid, minimize, and manage conflicts. Many submissions argued that coexistence should be a core, heavily weighted criterion rather than a secondary consideration.

Feedback highlighted the need for proponents to demonstrate detailed understanding of fishing activity, including spatial, temporal, and operational dimensions, and to assess impacts beyond individual parcels to adjacent areas and cumulative effects. Several submissions cautioned that without explicit evaluation standards, coexistence risks being addressed through vague commitments rather than enforceable plans.

- **Indigenous groups and rights holders** aligned closely on coexistence, particularly where fisheries intersect with Indigenous rights and livelihoods, emphasizing incorporation of Indigenous knowledge and lived experience.
- **The fishing sector** strongly emphasized coexistence as a prerequisite for project acceptability, calling for demonstrable pre-bid engagement, clear mitigation strategies, and the ability to reject projects where impacts cannot be adequately addressed. Several submissions emphasized developers need to understand the type of fishing, how harvesters interact with the area, and how displacement will impact various fisheries.
- **Industry** generally supported coexistence requirements but emphasized the need for proportionality and feasibility at the leasing stage.
- **Government** feedback supported coexistence through structured criteria and alignment with regional assessments and navigation safety considerations.
- **Other interested stakeholders** reinforced coexistence as central to environmental stewardship and social licence.

### Theme: Environmental Sustainability and Biodiversity Protection

Environmental sustainability, particularly biodiversity protection, emerged as a core theme with strong support for robust, enforceable requirements. Many submissions argued that biodiversity considerations should be treated as foundational expectations rather than optional enhancements, with clear minimum standards applied consistently across bids. The mitigation hierarchy – avoidance, minimization, mitigation, and monitoring – was frequently referenced as a guiding principle.

Respondents emphasized the importance of early baseline studies, cumulative impact assessment, adaptive management, and transparent reporting. Several recommended separating mandatory biodiversity requirements from optional, scored enhancements to improve comparability and avoid substituting innovation claims for baseline protection.

- **Indigenous groups and rights holders** emphasized integration of Indigenous knowledge and stewardship into biodiversity planning and monitoring.
- **The fishing sector** linked biodiversity protection directly to fisheries sustainability and long-term

ecosystem health.

- **Industry** generally supported biodiversity criteria but cautioned against over-prescription at early stages, favouring flexible frameworks supported by credible monitoring and adaptive management.
- **Government** submissions emphasized mandatory biodiversity plans assessed on a pass/fail basis, regulatory alignment, and consistency with future assessment processes.
- **Other interested stakeholders** strongly supported net-positive biodiversity outcomes, cumulative impact assessment, and nature-inclusive design, often advocating for higher ambition beyond regulatory minimums.

### Theme: Technical Capability, Financial Strength, and Deliverability

A recurring theme across submissions was the importance of prioritizing technical capability, financial strength, and proven deliverability in bid evaluation. Respondents consistently emphasized that offshore wind projects involve high capital costs, complex marine construction, long development timelines, and significant regulatory and execution risk. As a result, many submissions stressed that bid evaluation frameworks must be designed to identify proponents with the experience, organizational capacity, and financial resilience required to advance projects through development, construction, operation, and decommissioning.

Several respondents emphasized the need to distinguish between demonstrated capability and aspirational project concepts. Submissions noted that while innovation and ambition are important, early-stage bids should be grounded in evidence of past performance, proven delivery of comparable projects, and credible financing strategies. There was also discussion about the relationship between bid evaluation and prequalification, with some respondents suggesting that bid criteria should build on prequalification requirements rather than duplicating them, while others emphasized the need for continued screening at the bidding stage to reduce the risk of speculative or under resourced proponents securing seabed rights.

Across submissions, there was general support for evaluation criteria that prioritize offshore wind experience, marine construction expertise, financial strength, and realistic project planning, while treating early-stage project designs and timelines as indicative rather than binding. Respondents also highlighted the importance of ensuring that capability and deliverability criteria are sufficiently robust to protect public confidence, existing ocean users, and the credibility of the offshore wind sector.

- **Indigenous groups and rights holders** generally supported strong capability and deliverability requirements but emphasized that these criteria should not inadvertently exclude Indigenous participation or partnership opportunities. Several submissions highlighted the importance of evaluating proponents' experience working in partnership with Indigenous Nations, supporting Indigenous equity participation, and integrating Indigenous knowledge into project planning and delivery. Capability was viewed not only in technical and financial terms, but also in relation to governance, relationship building, and long-term accountability.
- **The fishing sector** supported robust deliverability criteria as a means of reducing risk to fisheries and marine ecosystems. Submissions emphasized that proponents lacking experience or financial resilience may be more likely to delay projects, change designs, or seek concessions later in the process, increasing uncertainty and potential impacts on fisheries. From this perspective, strong capability screening was seen as a way to minimize disruption and ensure proponents can follow

through on coexistence and mitigation commitments.

- **Industry** placed strong emphasis on proven offshore wind experience, balance sheet strength, and access to capital as critical indicators of deliverability. Many industry respondents recommended that technical and financial capability criteria carry the highest weighting, arguing that experienced proponents are better positioned to manage risk, meet regulatory requirements, and deliver projects on schedule. Some submissions also cautioned against over prescriptive project planning requirements at the leasing stage, preferring flexibility supported by demonstrated experience and financial capacity.
- **Government** feedback aligned with the importance of prioritizing capable and well-resourced proponents to reduce regulatory burden and project failure risk. Submissions highlighted the value of clear, objective capability criteria that support defensible decision making and align with prequalification requirements, while ensuring that bid evaluation does not reward speculative or unrealistic proposals.
- **Other interested stakeholders** generally supported strong technical and financial screening, often linking deliverability to broader public interest outcomes such as environmental protection, community confidence, and long-term economic benefits. Some submissions emphasized that credible proponents are better positioned to invest in environmental studies, engagement, and local capacity building over the life of a project.

### Theme: Community Benefits, Local Content, and Workforce Development

Community benefits and local economic participation featured prominently across submissions, with emphasis on ensuring offshore wind development delivers tangible, long-term value to Nova Scotia communities. Respondents highlighted workforce development, local supply chain participation, and inclusive economic opportunities as key objectives, while cautioning against unrealistic or unenforceable commitments at the bidding stage.

Many submissions recommended structured, accountable approaches to community benefits, including clear governance, measurable targets, and mechanisms to avoid consultation fatigue. There was also emphasis on aligning commitments with Nova Scotia's actual strengths and capacity.

- **Indigenous groups and rights holders** emphasized community benefits as instruments of reconciliation, economic participation, and long-term stewardship, advocating for co-developed agreements and revenue-sharing mechanisms.
- **Industry** feedback generally supported community benefits but cautioned against competitive scoring of early-stage commitments, favouring binding but achievable obligations post-award.
- **Government** feedback supported inclusion of community benefits to support municipal capacity and acceptance.
- **Other interested stakeholders** emphasized inclusivity, equity, and long-term workforce pathways, particularly for underserved groups.


### Theme: Process Timing, Readiness, and Sequencing



Process timing, readiness, and sequencing emerged as a cross-cutting concern across submissions, with respondents emphasizing that the pace and order of decisions will materially influence outcomes for offshore wind development. Many submissions cautioned that advancing an offshore wind Call for Bids without sufficient baseline information, regulatory clarity, or shared understanding of evaluation frameworks could increase risk, exacerbate conflict, and undermine confidence in the process. Timing was frequently linked to the availability of environmental, fisheries, and spatial data, as well as to proponents' ability to meaningfully engage with affected communities.

Several respondents emphasized that sequencing matters as much as timing. Submissions highlighted the importance of completing key planning and assessment steps – such as regional or cumulative effects analyses, refinement of parcel design, and clarification of bid evaluation criteria – before initiating competitive processes. Others noted that compressed timelines may disproportionately disadvantage certain stakeholder groups by limiting their capacity to review information, participate in engagement, or prepare submissions.

At the same time, some submissions acknowledged the need for momentum and regulatory certainty, emphasizing that prolonged uncertainty or repeated delays could affect investment interest and sector credibility. These respondents generally supported proceeding with an offshore wind Call for Bids once minimum information thresholds are met, provided that expectations are clear and that early phases are treated as learning opportunities with scope for adaptation.

- **Indigenous groups and rights holders** highlighted timing and sequencing as central to meaningful, rights-based engagement. Feedback emphasized that rushed timelines could undermine Nation-to-Nation consultation, limit the ability of Indigenous Nations to assess impacts or participate effectively, and increase the risk of decisions being made before rights and interests are fully understood.
  - **The fishing sector** consistently emphasized readiness and sequencing, expressing concern that insufficient baseline data and unresolved questions about coexistence could lead to irreversible impacts on fisheries. Many submissions advocated for delaying or staging the Call for Bids until additional research, mapping, and engagement are completed, viewing timing as a risk-management tool to protect existing livelihoods.
  - **Industry** generally supported realistic and predictable timelines aligned with the complexity of evaluation requirements. While some industry respondents cautioned against proceeding without sufficient clarity, others emphasized that prolonged uncertainty or repeated deferrals could affect investment planning. Several submissions supported phased or staged approaches that balance readiness with the need for forward progress.
  - **Government** feedback focused on procedural robustness, regulatory alignment, and defensibility. Submissions emphasized the importance of sequencing decisions in a manner that supports consistent application of regulatory processes, reduces legal risk, and ensures that sufficient information is available to support decision-making.
  - **Other interested stakeholders** often aligned with calls for greater readiness, emphasizing the need for transparency about what information is available, what remains uncertain, and how gaps will be addressed over time.
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## > Coexistence

Across all submissions, coexistence is widely recognized as essential but there is deep disagreement about whether, where, and how it is achievable. Respondents consistently called for early definition, meaningful engagement, avoidance first planning, practical safety considerations, and enforceable monitoring frameworks. Differences emerge primarily around confidence in feasibility, degree of regulatory prescription, and the balance between flexibility and certainty, but there is strong alignment that coexistence must be real, demonstrable, and grounded in shared decision making rather than assumed outcomes.

### Theme: Coexistence Must Be Clearly Defined, Operational, and Established Upfront

Across submissions, coexistence is repeatedly described as poorly defined, inconsistently applied, and inadequately operationalized. Many respondents stressed that coexistence cannot remain an aspirational concept or rhetorical principle; instead, it must be clearly defined, jointly determined and agreed upon upfront, and embedded as a binding and enforceable requirement early in the offshore wind planning and land tenure process. Several submissions framed coexistence as shared decision-making, continuity of existing uses, and enforceable rights, not simply spatial overlap or compensation after the fact.

A recurring concern is that the absence of a shared definition creates uncertainty about how, where, when, and under what conditions offshore wind development can occur alongside existing ocean uses. Several submissions emphasized that without an upfront, functional definition, coexistence risks being assessed only after key decisions – such as parcel identification or licensing – are already made, thereby limiting meaningful influence by affected parties.

There is also strong emphasis on methodology. Respondents called for proponents to be required, as part of bid submissions, to clearly articulate how they define coexistence, how it will be assessed, which interactions and users are included, what data sources are relied upon, and how collaboration has occurred to date. Clear articulation is seen as essential for regulators to evaluate credibility, inclusiveness, and robustness.

There is broad alignment within the submissions that coexistence cannot rely on voluntary commitments. Respondents called for legally binding coexistence requirements embedded in Submerged Land Licences, clear roles and responsibilities for developers, regulators, and ocean users, independent review and third-party assessment of coexistence plans, and transparent, public access to monitoring and reporting data.

- **Indigenous groups and rights holders** emphasized that coexistence must explicitly recognize and uphold Mi'kmaq asserted and established rights, particularly treaty protected fisheries. Coexistence is framed not merely as shared use, but as a rights-based obligation that must be applied consistently across planning, construction, operation, monitoring, and decommissioning. There is strong emphasis on early involvement, co-development, and respect for Indigenous knowledge systems.
- **The fishing sector** was the most critical of the current lack of definition of coexistence. Many expressed skepticism that coexistence is being treated as a procedural placeholder rather than a demonstrable condition. Fishers emphasized that coexistence must be defined collaboratively, negotiated prior to bid approval, and grounded in enforceable arrangements. Several stressed that advancing development without a clear definition fundamentally undermines trust and credibility.

- **Industry** generally agreed that coexistence must be clearly defined but emphasized flexibility rather than prescriptiveness. Developers supported requiring proponents to articulate their understanding of coexistence in bids, while cautioning against rigid, one size fits all definitions that could limit site specific solutions or adaptive management.
- **Government** perspectives acknowledged the importance of coexistence as a guiding principle but tended to frame definition setting as part of broader marine spatial planning and regulatory evolution. While recognizing uncertainty, government submissions emphasized evidence based planning and intergovernmental coordination rather than stakeholder negotiated definitions at the bid stage.
- **Other interested stakeholders** strongly reinforced the need for a shared, early definition, often linking it to legitimacy, transparency, and public trust. Several emphasized that coexistence must be co-created and co-owned by affected communities rather than imposed through top-down regulatory language.

### Theme: Early, Continuous, and Meaningful Engagement Is Essential

A dominant theme across all submissions is that early and sustained engagement is a prerequisite for meaningful coexistence. Respondents consistently emphasized that engagement must begin before parcels are finalized or bids approved and must continue throughout the full project lifecycle. Many submissions criticize the current process as too advanced for the level of information available, citing concern that parcel identification and licensing are proceeding before baseline science and engagement are completed, and that consultation timelines are restrictive and one directional.

Engagement is described not simply as consultation, but as active participation in decision making, including parcel design, turbine layout, cable routing, construction timing, and monitoring frameworks, operations and decommissioning. Many submissions stressed that late-stage engagement – after major decisions are made – creates conflict, erodes trust, and limits the ability to avoid or mitigate impacts.

There is also strong emphasis on structured engagement mechanisms, such as advisory councils, liaison officers, working groups, and co-planning or management arrangements, to ensure engagement is resourced and accountable rather than ad hoc, and continuous through the lifecycle of a project.

- **Indigenous groups and rights holders** framed engagement as an expression of the Crown's duty to consult and accommodate, not a discretionary activity. Engagement must be early, meaningful, and ongoing, with Indigenous communities having genuine influence over outcomes, with several Indigenous responses stating they were not engaged early enough. Integration of Mi'kmaq knowledge and participation in monitoring were repeatedly highlighted.
- **The fishing sector** emphasized that they were often not engaged early enough, and in some cases had to organize collectively to be heard. They stressed that engagement must be continuous, transparent, and free from artificial deadlines that limit participation. Many called for formal commitments to engagement at every stage of development.
- **Industry** strongly supported early and ongoing engagement, citing international experience where fisheries liaison officers, dedicated communication programs, and standing working groups reduced conflict. However, industry also noted that engagement must be appropriately timed to avoid forcing discussions before project details are sufficiently defined.

- **Government** perspectives emphasized continued engagement with fishing communities and Indigenous authorities, particularly to identify conflicts and mitigation measures. Engagement was framed as a mechanism to support evidence based planning and regulatory certainty.
- **Other interested stakeholders** reinforced engagement as foundational to legitimacy, social acceptance, and orderly development. Several emphasized that engagement quality – not just frequency – should be a criterion in bid evaluation.

### Theme: Avoidance and Mitigation Must Be Prioritized Over Compensation


A strong and consistent theme is the application of a mitigation hierarchy: first avoid impacts, then minimize and mitigate where avoidance is not possible, and use compensation only as a last resort. Many submissions stressed that compensation alone cannot replace lost access, safety, fishing, harvesting and cultural practices, or long-term economic viability.

Avoidance is most frequently linked to spatial planning, including siting decisions, parcel design and boundaries, turbine density, buffers, and routing of cables and vessel traffic. Mitigation measures discussed include navigation corridors, construction timing, fishing-friendly layouts, and adaptive management.

Compensation, while acknowledged as necessary in some cases, is widely viewed as insufficient if coexistence fundamentally displaces fishing or undermines rights. Submissions state that it must be preapproved, binding, transparent, and sufficient, rather than negotiated after impacts occur.

Fishing is repeatedly described as a foundational economic and cultural pillar of Nova Scotia, particularly in Cape Breton and rural coastal communities. Respondents expressed concern about long-term loss of livelihoods and intergenerational impacts, displacement of shore-based processing, labour, and investment, and competition for ports, labour, and marine services.

Some submissions support offshore wind for its economic potential but insist benefits must be locally retained and not come at the expense of existing industries.

- **Indigenous groups and rights holders** emphasized that avoidance is critical where treaty rights are at stake. Coexistence should not diminish or override Aboriginal and treaty rights fisheries, which must be prioritized above economic considerations. Compensation is not seen as an adequate substitute for rights-based access.
  - **The fishing sector** strongly supported the avoidance mitigation compensation hierarchy. Many stressed that compensation is a last resort and does not address loss of fishing grounds, safety risks, or community impact, that compensation is not an acceptable substitute for lost access, safety risks, or long-term ecological uncertainty. Several expressed concern that compensation frameworks are being discussed separately from coexistence, increasing uncertainty.
  - **Industry** generally endorsed the mitigation hierarchy, highlighting design-based solutions and engineering measures to reduce impacts. Some industry stakeholders emphasized that regional or government-led compensation frameworks could help ensure fairness and consistency.
  - **Government perspectives** acknowledged compensation as one tool among many, while emphasizing planning approaches that minimize disruption. Some submissions noted unresolved questions about insurance, liability, and compensation mechanisms.
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- **Other interested stakeholders** reinforced the hierarchy and stressed that compensation frameworks should be codeveloped with affected communities and designed to support long-term viability rather than short-term payouts.

### Theme: Safety, Access, and Operational Feasibility Are Central to Coexistence

Many submissions emphasized that coexistence cannot be assumed simply because fishing is technically permitted within offshore wind areas. Operational feasibility – particularly spatial planning, safety, navigation, gear deployment, weather conditions, and operational efficiency – is a central concern.

Fishers repeatedly highlighted risks related to turbine density, floating turbine mooring lines, dynamic cables, construction exclusion zones, increased vessel traffic, and emergency response. Several argued that these factors may lead to an effective loss of access, even where formal exclusion does not exist.

Industry and government submissions also emphasized safety, particularly for navigation, search and rescue operations during foul weather, and interaction with existing infrastructure such as ferry routes and shipping lanes.

- **Indigenous groups and rights holders** linked safety and access to the ability to exercise treaty rights. Any coexistence approach must ensure safe and reliable access for Indigenous fisheries and cultural practices.
- **The fishing sector** expressed the greatest concern about safety and feasibility, particularly for mobile and fixed-gear fisheries. Many argued that in certain areas and at certain scales of development, coexistence may simply not be achievable within wind farm areas.
- **Industry** acknowledged safety constraints and emphasized design solutions such as wide, clearly marked navigation corridors, turbine alignment, lighting alignment that minimizes interference, and early coordination with coast guard and search and rescue authorities. Some noted that coexistence may differ between fixed bottom and floating technologies.
- **Government** perspectives emphasized coordinated planning of transit corridors, turbine spacing, and exclusion zones to address safety and navigation risks, while recognizing unresolved uncertainties.
- **Other interested stakeholders** echoed concerns about safety and emphasized that forcing coexistence where risks cannot be acceptably managed could undermine public confidence.

### Theme: Monitoring, Transparency, and Adaptive Management Are Critical

There is broad agreement that coexistence commitments must be supported by robust monitoring, transparent reporting, and adaptive management. Respondents emphasized that impacts may evolve over time and that coexistence frameworks must be capable of responding to new information.

A common concern is the lack of adequate baseline data on fisheries, habitat connectivity, and cumulative effects. Submissions highlighted insufficient fisheries science and overreliance on historical data, unknown long-term effects on species distribution, migration, and stock connectivity, and risks associated with subsea cables, seabed disturbance, and increased vessel traffic.

Many submissions called for shared access to environmental data, fisheries data, and monitoring results, with Indigenous and fishing participation in data collection. Transparency is seen as essential to building trust and ensuring accountability.

Adaptive management is frequently linked to clear thresholds and mechanisms to modify or halt operations if impacts exceed acceptable levels.

- **Indigenous groups and rights holders** emphasized Indigenous-led or co-led monitoring, data sovereignty, and participation in research to ensure trust and credibility.
- **The fishing sector** stressed the need for baseline data, control sites, and long-term monitoring to attribute impacts. Many expressed concern that coexistence measures cannot be evaluated without clear monitoring and enforcement mechanisms.
- **Industry** highlighted international experience with long-term monitoring and adaptive management and emphasized that clear expectations reduce delivery risk. Some also highlighted international evidence of potential biodiversity benefits (e.g., reef effects) while stressing that these outcomes are context dependent and uncertain, requiring long-term monitoring and adaptive management.
- **Government** perspectives emphasized evidence-based planning, integration of monitoring into future planning stages, and intergovernmental coordination.
- **Other interested stakeholders** strongly supported transparency, public access to data, and adaptive frameworks that allow coexistence measures to evolve.

## ➤ Considerations for Fisheries' Compensation

Submissions consistently emphasized that the continuation of fishing activity is the priority in the context of offshore wind development, with broad agreement that compensation should be considered only as a last resort after avoidance, mitigation, and coexistence measures have been fully pursued. Across submissions, compensation was not viewed as a substitute for careful project design, siting, timing, and engagement intended to minimize impacts on fisheries. Many respondents stressed that compensation should not function as a mechanism to normalize or enable displacement of fishing activity, noting that fishing livelihoods are long-standing, intergenerational, and central to the social, cultural, and economic fabric of coastal and Indigenous communities.

Feedback also highlighted strong concern regarding the absence of clear, advanced, and enforceable fisheries compensation frameworks. Submissions emphasized the need for frameworks to be established before key regulatory milestones, including bid acceptance and the issuance of Submerged Land Licences, to reduce uncertainty and risk for fishing interests, communities, and developers. Submissions stressed that compensation frameworks must clearly define eligibility, compensable impacts, valuation methodologies, governance and administration, and dispute resolution processes. Many submissions underscored that fisheries impacts may be direct, indirect, cumulative, and long-term, extending beyond short-term construction disruption to include loss of access, displacement, increased operating costs, and longer-term

effects on fishing enterprises and licence value. There was strong support for transparent, independently administered compensation mechanisms, with meaningful involvement of fishing and Indigenous representatives, and recognition that compensation approaches must be embedded within a broader commitment to coexistence, regulatory clarity, and long-term sustainability.

### Theme: Compensation as a Last Resort Within a Mitigation Hierarchy

Across submissions, there was broad agreement that compensation should not be the primary tool for addressing fisheries' impacts from offshore wind development. Instead, respondents consistently emphasized a hierarchy that prioritizes avoidance of impacts first, followed by mitigation and coexistence measures, with compensation applied only where residual impacts cannot reasonably be avoided. Compensation was frequently described as necessary but undesirable, reflecting a shared concern that financial payments cannot fully replace access to fishing grounds, livelihoods, or cultural continuity tied to fishing activity.

Many submissions stressed that framing compensation too early, or as a default mechanism, risks undermining incentives to design projects in ways that genuinely minimize impacts on fisheries. Respondents highlighted that compensation should not function as a mechanism to “pay off” fishing interests to enable development, nor should it be a substitute for careful siting, parcel design, construction timing, or operational practices that reduce interference with fishing activity. Respondents stressed careful, site-specific assessment of impacts, considering that effects may extend well beyond the immediate project area, and that compensation frameworks must be broad enough to include all affected parties.

- **Indigenous groups and rights holders** strongly supported the avoidance-first principle, emphasizing that compensation cannot replace the protection of rights-based fishing activities. Compensation was framed as a safeguard only after all feasible measures to avoid and mitigate impacts on Mi'kmaw fisheries had been exhausted and not as a discretionary or goodwill measure.
- **The fishing sector** repeatedly stated that harvesters “want to fish, not be compensated.” Compensation was consistently characterized as a last resort, necessary only if development proceeds in ways that displace fishing activity despite best efforts to avoid impacts. Fishers expressed concern that an over-reliance on compensation could normalize the loss of fishing grounds rather than prevent it.
- **Industry** also endorsed the mitigation hierarchy, emphasizing that compensation should be limited to demonstrable, project-attributable impacts that remain after avoidance and mitigation. Several industry respondents cautioned against blanket or premature compensation mechanisms, arguing instead for evidence-based, site-specific approaches.
- **Government** feedback aligned with the principle that compensation is one tool among many and should be considered alongside mitigation and engagement. However, government submissions generally did not articulate a detailed hierarchy or thresholds for when compensation would apply.
- **Other interested stakeholders** echoed that compensation should follow avoidance and minimization measures and be justified, proportionate, and evidence-based. Compensation was framed as part of a broader regulatory framework rather than a standalone solution.

### Theme: Need for Clear, Advance, and Enforceable Compensation Frameworks

A dominant theme was the need for clearly defined fisheries compensation frameworks established in advance of key regulatory milestones, particularly before bids are accepted or Submerged Land Licences are issued. Submissions repeatedly identified the absence of finalized federal or provincial frameworks as a major source of uncertainty, risk, and mistrust for fishing interests and coastal communities.

Respondents emphasized that compensation frameworks must clearly define what triggers compensation, who is eligible, what impacts are compensable, how losses are valued, and how disputes are resolved. Many respondents argued that leaving these questions to be negotiated after impacts occur, or on a project-by-project basis, places an unfair burden on fishers and undermines confidence in the regulatory process.

- **Indigenous groups and rights holders** were explicit that compensation frameworks must be finalized and agreed upon before licences are issued, with compensation plans treated as a condition of approval rather than an afterthought. Frameworks were expected to be rights-based, legally sound, and developed in collaboration with affected Mi'kmaw communities.
- **The fishing sector** consistently called for compensation frameworks to be in place before bids or seabed tenure are granted. Fishers emphasized that without advance clarity, they face unacceptable financial and livelihood risks and lack confidence that compensation discussions conducted later would be fair or credible.
- **Industry** respondents also supported advance clarity, noting that defined frameworks allow developers to integrate compensation costs into project planning and reduce the risk of prolonged negotiations or delays. However, industry feedback tended to emphasize predictability and cost certainty alongside fairness.
- **Government** feedback acknowledged the importance and complexity of fisheries compensation and highlighted ongoing engagement, but did not provide detailed positions on timing, scope, or enforceability of frameworks.
- **Other interested stakeholders** supported early definition of foundational elements of compensation frameworks to improve predictability and alignment across regulators, developers, and fishing communities.

### Theme: Scope of Compensable Impacts and Long-Term Effects

Respondents emphasized that compensation must address the full scope of impacts associated with offshore wind development, including direct, indirect, cumulative, and long-term effects. Impacts identified went well beyond immediate construction disruption to include loss of access, displacement into other fishing areas, increased operating costs, reduced catch efficiency, gear damage, habitat disturbance, and long-term devaluation of fishing licences and enterprises.

Many submissions stressed that impacts may persist or evolve over the full lifecycle of offshore wind projects, which can span decades. As a result, compensation models limited to short-term or one-time payments were widely viewed as inadequate, particularly where fishing livelihoods, retirement plans, and intergenerational continuity are at stake.

- **Indigenous groups and rights holders** emphasized that compensation must recognize the unique and evolving nature of Mi'kmaw fishing activities, including treaty-protected fisheries and future expansion into new areas. Compensation frameworks were expected to account for cumulative and long-term impacts on rights-based harvesting.
- **The fishing sector** strongly emphasized long-term and cumulative impacts, including spillover effects where displaced fishers move into adjacent areas, affecting others who were not directly excluded. Many fishers stated that if compensation is required, it must be fair, ongoing (not one-time), and reflect both direct and indirect impacts, such as displacement and effects on the value of fishing licences and assets. Compensation should account for the broader ripple effects across neighbouring fishing sectors and communities.
- **Industry** generally distinguished between construction-phase impacts (seen as most significant) and operational impacts (viewed as more limited and gear-specific). Some industry respondents cautioned against assuming long-term impacts in the absence of evidence, advocating for compensation based on demonstrated losses.
- **Government** feedback did not elaborate in detail on the scope of compensable impacts but recognized fisheries compensation as complex and requiring early and ongoing engagement to inform processes, build trust, and allow community to communicate perspectives and concerns effectively.
- **Other interested stakeholders** supported compensation approaches that consider cumulative impacts and operate within broader impact assessment and adaptive management frameworks.

### Theme: Governance, Administration, and Independence of Compensation Mechanisms

A recurring theme was concern about who should administer fisheries compensation and how governance structures should ensure fairness, transparency, and accountability. Many submissions argued against developer-led or ad hoc, project-by-project negotiations, citing power imbalances, inconsistency, and lack of trust.

There was strong support for government-led or independent, third-party administered compensation mechanisms, potentially standardized province-wide, with clear rules and inclusive governance that involves fishing and Indigenous representatives. Independent administration was viewed as critical to credibility and to avoiding conflicts of interest.

- **Indigenous groups and rights holders** emphasized the need for compensation mechanisms that are separate from commercial fisheries processes and that include Indigenous-defined approaches reflecting treaty rights and community priorities.
- **The fishing sector** strongly favored independent or government-administered mechanisms, with forensic accounting, transparent valuation, and sector-by-sector application. Many fishers expressed distrust of developer-controlled processes.
- **Industry** also supported centralized or independent administration, noting that standardized approaches reduce transaction costs, ensure consistency, and provide clearer accountability.

- **Government** feedback referenced engagement in discussions but did not articulate a preferred governance model or administrative structure.
- **Other interested stakeholders** emphasized collaborative, co-created governance models involving fishing communities, particularly where compensation is intended to support long-term resilience rather than short-term loss recovery.

### Theme: Recognition of Rights, Culture, and Community Continuity

Many submissions framed fisheries compensation not merely as an economic issue, but as one deeply connected to rights, culture, identity, and community continuity. Respondents emphasized that fishing livelihoods are multi-generational and community-defining, and that compensation frameworks must recognize this broader context rather than treating impacts as purely financial losses. Respondents stress that compensation should not be viewed as a means to displace one industry for the benefit of another.

There was strong resistance to narratives that portray fisheries as an interest that can be displaced or offset through payment. Instead, respondents emphasized coexistence that maintains both ecological integrity and the social and economic foundations of coastal and Indigenous communities.

- **Indigenous groups rights holders** centered treaty rights, cultural continuity, and stewardship responsibilities, stressing that compensation must recognize rights, not goodwill, and support long-term community viability.
- **The fishing sector** highlighted family livelihoods, retirement security tied to licences, and the irreplaceable nature of fishing as a way of life. Many expressed that no amount of compensation could fully offset the loss of access to the ocean. Several emphasized ensuring the continuance of commercial fishing activities as the highest priority when considering offshore wind development.
- **Industry** acknowledged the cultural and economic importance of fisheries and emphasized coexistence, though generally framed compensation in economic and operational terms rather than rights-based language.
- **Government** feedback recognized the importance of fisheries to municipalities and communities but did not elaborate on cultural or rights-based dimensions.
- **Other interested stakeholders** emphasized community-managed and flexible compensation models that support long-term resilience and shared marine space.

## > Proposed Fees for all Bid Submissions and Successful Bidders

Respondents provided extensive and detailed feedback on the proposed bid submission and licence issuance fees for offshore wind development, reflecting a strong shared interest in ensuring the offshore wind Call for Bids process is credible, competitive, and aligned with public-interest outcomes. Across submissions, there was broad agreement that fees play an important role in signaling seriousness of intent and discouraging speculative participation. However, respondents expressed sharply differing views on the appropriate magnitude, timing, and structure of those fees, particularly in the context of Nova Scotia's emerging offshore wind market and prevailing uncertainties related to offtake, transmission, permitting pathways, and project timelines.

A recurring concern across all respondent groups was that large, upfront, non-refundable fees could create unintended barriers to participation, reduce competition, and favour large, well-capitalized incumbents over smaller, innovative, Indigenous-led, or community-based proponents. At the same time, several respondents emphasized the need for mechanisms that ensure proponents have the financial capacity to meet long-term obligations, including environmental protection, coexistence with fisheries, and decommissioning. Many submissions suggested that financial guarantees, milestone enforcement, and licence conditions may be more effective than sunk fees in achieving these objectives.

Another dominant cross-cutting theme was the use of fee revenues. Respondents consistently called for greater transparency and accountability regarding how fees are calculated and how revenues would be used. There was widespread expectation that bid and licence fees should deliver tangible benefits to affected regions, Indigenous communities, and fisheries, rather than flowing into general revenues without clear linkage to offshore wind impacts. Overall, feedback emphasized the importance of designing a fee framework that balances seriousness and accountability with accessibility, fairness, and long-term public trust.

### Theme: Transparency, Accountability, and Use of Fee Revenues

Across all submissions, there was a strong and consistent call for transparency in both the design and application of bid submission and licence issuance fees. Respondents emphasized that clear public disclosure of fee amounts, calculation methodologies, and intended uses is essential to building confidence in the offshore wind Call for Bids process. Many submissions cautioned that without transparency, fees risk being perceived as arbitrary or revenue-generating tools rather than mechanisms that support effective regulation and responsible development.

Respondents frequently argued that fee revenues should be explicitly linked to identifiable and publicly communicated outcomes. These included regulatory oversight capacity, environmental assessment and monitoring, fisheries science and engagement, community benefits, and long-term decommissioning and remediation assurance. Several submissions recommended that revenues be placed into dedicated, arm's-length funds with defined purposes and governance structures, rather than flowing into consolidated government revenues. International examples were cited where earmarked funds improved accountability and strengthened social licence.

- **Indigenous groups and rights holders** emphasized that transparency is foundational to respecting Indigenous rights and jurisdiction. Indigenous respondents called for clear articulation of whether and how fee revenues would support Mi'kmaw priorities, including capacity funding, stewardship, and community benefits. Several submissions noted that transparency around fee use is essential to informed consent and meaningful participation in offshore wind decision-making.
- **The fishing sector** strongly supported transparent disclosure of how fees would be used, particularly where revenues could offset the real and ongoing costs borne by the fishing sector. These included costs associated with engagement, participation in science and monitoring programs, and long-term coexistence and compensation mechanisms. Transparency was viewed as critical to trust, given historical experiences with offshore development.
- **Industry** generally supported transparent fee frameworks as a means of improving predictability and investment certainty. Submissions emphasized that clarity on the purpose, timing, and allocation of fees is necessary for accurate financial modelling and competitive bidding. Several respondents cautioned that opaque or discretionary use of fees could increase perceived regulatory risk.

- **Government** emphasized transparency as essential to public confidence and regulatory legitimacy. Several submissions highlighted the importance of clearly communicating the rationale for fees, the authority under which they are set, and how revenues align with regulatory mandates and public policy objectives.
- **Other interested stakeholders** focused on transparency as a prerequisite for social licence. Many emphasized the need for publicly reported funds and accessible information demonstrating how fee revenues translate into tangible community and environmental outcomes.

### Theme: Level and Structure of Bid Submission Fees

A central focus of respondent feedback was the proposed CAD \$250,000 non-refundable bid submission fee. Many respondents argued that a large, non-refundable upfront payment is poorly aligned with the early-stage risk profile of offshore wind development in Nova Scotia. Submissions highlighted ongoing uncertainty related to market conditions, policy frameworks, and enabling infrastructure, suggesting that significant sunk costs at the bidding stage could deter participation and suppress competition.

Respondents frequently noted that non-refundable bid fees are uncommon in international offshore wind regimes and more closely resemble legacy offshore oil and gas systems. As alternatives, many proposed refundable bid deposits, bid bonds, letters of credit, or other guarantee-based mechanisms that would discourage speculative bids without imposing disproportionate financial risk on unsuccessful proponents. Several submissions suggested limiting non-refundable fees to nominal administrative costs, with seriousness demonstrated through enforceable post-award obligations. Some suggested fee levels should be considered alongside bid evaluation criteria that emphasize demonstrated technical capability and project delivery readiness, so that the process continues to attract proponents with both financial capacity and credible offshore execution experience.

- **Indigenous groups and rights holders** expressed concern that high non-refundable bid fees could act as a barrier to Indigenous-led or Indigenous-partnered projects. Submissions recommended reduced fees, exemptions, or alternative financial instruments to support equitable access and participation, noting that fee structures should not undermine broader reconciliation and economic participation objectives.
- **The fishing sector**, while less directly affected by bid submission fees, generally supported the principle that fees should screen out non-serious proponents. However, they cautioned against fee structures that allow speculative entry without downstream accountability for impacts, emphasizing that seriousness must extend beyond the bid stage.
- **Industry** widely opposed large non-refundable bid fees, arguing that they could reduce bidder participation, limit innovation, and disadvantage smaller or newer developers. Many advocated strongly for refundable or guarantee-based approaches that preserve competition while still discouraging speculative behaviour. There should be clear communication surrounding how fees align with project life cycle milestones.
- **Government** submissions were divided, with some viewing a substantial bid fee as an appropriate signal of seriousness and administrative cost recovery, while others raised concerns that excessive upfront costs could deter participation in an emerging market.

- **Other interested stakeholders** often echoed concerns about accessibility and competition, cautioning that high non-refundable fees may concentrate participation among a small number of large proponents and reduce diversity of approaches and benefits.

### Theme: Licence Issuance Fees and Timing of Payments

Respondents provided extensive feedback on the proposed CAD \$750,000 fee payable upon issuance of a Submerged Land Licence. The primary concern centered on the timing of this payment and whether large upfront cash requirements are appropriate before key project risks are resolved. Many submissions argued that early licence fees could strain project financing and undermine viability, particularly where developers have limited control over permitting timelines or market readiness.

A common recommendation was for milestone-based or phased licence fees tied to demonstrable progress, such as securing a power purchase agreement, achieving permitting approvals, reaching final investment decision, or commencing construction. Several submissions indicated that licence fees may be more acceptable if route-to-market certainty and enabling conditions are clearly established.

- **Indigenous groups and rights holders** generally supported licence fees that demonstrate seriousness of intent but emphasized that fee structures must respect Indigenous rights and include mechanisms for benefit sharing. Some submissions linked licence fees to broader expectations around consent, accommodation, and long-term partnership.
- **The fishing sector** emphasized that licence fees should reflect the true costs of coexistence, including fisheries compensation, monitoring, and adaptive management. Some suggested that licence fees could contribute to dedicated mitigation or reserve funds.
- **Industry** strongly favoured milestone-based licence fees and opposed large upfront payments disconnected from project maturity or factors outside developer control. Phased approaches were viewed as more consistent with international best practice.
- **Government** generally supported licence fees as a signal of commitment and a means of ensuring regulatory cost recovery, but several emphasized the importance of aligning payment timing with development milestones to avoid unintended barriers.
- **Other interested stakeholders** focused on the downstream implications of licence fee timing, particularly where early payments could delay or discourage projects that might otherwise deliver community or environmental benefits.

### Theme: Deterring Speculative Bidding While Maintaining Competition

There was broad agreement that bid and licence fees should help deter speculative participation and ensure that only credible, capable proponents advance through the process. However, respondents differed on how best to achieve this objective. Many argued that high upfront fees are a blunt instrument that may not effectively screen for long-term capability or commitment.


Alternative mechanisms proposed included enforceable development milestones, performance bonds, and clear licence revocation provisions for non-performance. Several submissions warned that excessive upfront fees could unintentionally favour large incumbents with access to capital, reducing diversity, innovation, and competition in the offshore wind sector.

- **Indigenous groups and rights holders** supported mechanisms that ensure serious participation while avoiding structures that disadvantage Indigenous or community-based proponents. Equity of access and long-term accountability were emphasized.
- **The fishing sector** stressed the importance of financially robust proponents capable of meeting long-term obligations, including cleanup and compensation, noting past experiences with offshore project abandonment.
- **Industry** consistently argued that milestone enforcement and financial guarantees are more effective than non-refundable fees in ensuring seriousness without suppressing competition.
- **Government** highlighted the need to balance effective screening with policy objectives related to competition, innovation, and timely project delivery.
- **Other interested stakeholders** expressed concern that overly restrictive fee structures could limit participation and reduce the range of project models and community outcomes.

### Theme: Allocation of Fees to Community, Regional, and Fisheries Benefits

A prominent theme across submissions was the expectation that fee revenues should deliver tangible benefits to affected regions and sectors. Respondents emphasized that communities and industries bearing the impacts of offshore wind development should see direct returns from bid and licence fees.

Proposed uses included port and marine infrastructure upgrades, workforce training, local supply-chain development, fisheries coexistence programs, and enhanced environmental monitoring. Several submissions framed regional reinvestment as essential to social licence and warned against repeating extractive models that provide limited local benefit.

- **Indigenous groups and rights holders** strongly advocated for direct financial benefits, revenue sharing, and investments in Indigenous employment, training, procurement, and ownership opportunities. Several submissions stressed that to have meaningful and fair opportunities, treaty rights should be reference, and affirmative measures required to include Mi'kmaq and participation metrics and ensure the protection of fishing interests. Penalties and/or licence termination should be implemented if the above conditions are not met.
  - **The fishing sector** emphasized dedicating revenues to fisheries compensation, science, monitoring, and sustained engagement capacity to support long-term coexistence.
  - **Industry** was generally open to earmarking revenues for infrastructure and community benefits where this supports project readiness and reduces long-term risk.
  - **Government** frequently supported regional reinvestment where aligned with provincial priorities, economic development goals, and host-community impacts.
  - **Other interested stakeholders** emphasized community-level benefits, local decision-making, and ensuring that revenues are visible and meaningful to affected coastal communities.
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## Theme: Financial Security, Decommissioning, and Long-Term Liability

Respondents consistently emphasized the importance of ensuring that offshore wind developers bear full financial responsibility for decommissioning, remediation, and potential project failure. Many submissions recommended robust financial security mechanisms, such as performance bonds or guarantees equal to estimated decommissioning costs and updated overtime.

Several respondents argued that proposed bid and licence fees are small relative to total project costs and insufficient on their own to address long-term liability. There was broad support for linking licence conditions, financial security, and enforcement mechanisms to prevent future public or industry exposure.

- **Indigenous groups and rights holders** emphasized protecting rights, lands, and waters through enforceable financial and regulatory safeguards that ensure long-term stewardship.
- **The fishing sector** strongly supported guaranteed funds for cleanup and compensation to avoid long-term impacts on fisheries and marine ecosystems.
- **Industry** generally accepted the need for robust financial security but advocated for non-cash instruments and phased approaches aligned with evolving project risk.
- **Government** supported measures to ensure taxpayers are not exposed to long-term liabilities and that regulatory and remediation costs are fully recovered.
- **Other interested stakeholders** emphasized precaution and long-term accountability, noting the importance of clear responsibility should projects fail or be abandoned.

## ➤ Principles Listed in the Accord Acts

Across submissions, respondents consistently emphasized that the principles set out in the *Accord Acts* should meaningfully guide offshore wind development, particularly through enforceable requirements rather than high-level statements of intent. While there was broad support for applying the *Accord Acts* principles to offshore wind, respondents differed significantly in how prescriptive, flexible, or precautionary that application should be.

Core areas of focus included the Crown's duty to consult with Indigenous Peoples, the interpretation of "importance" with respect to fishing activities, transparency and accountability in governance and decision-making, and how principles related to equity, participation, and Canadian content should be operationalized through bid criteria and licensing.

Distinctions emerged between respondents regarding roles, responsibilities, and acceptable levels of discretion. Collectively, submissions underscored that the credibility of the offshore wind regime will depend on whether these principles translate into measurable actions, clear governance accountability, and durable coexistence with existing ocean users.

## Theme: Interpreting and Operationalizing *Accord Act* Principles

Respondents widely agreed that the *Accord Acts* provide the appropriate legislative foundation for offshore wind governance but diverged on whether principles should be embedded as binding, enforceable requirements early in the process or applied flexibly as projects mature. Many submissions stressed that principles such as fairness, transparency, accountability, and balanced joint governance must be reflected consistently across strategic planning, Calls for Bids, and licensing decisions, rather than applied selectively or deferred to later permitting stages. Concerns were raised that treating principles as aspirational risks weakening their practical effect and undermining confidence in orderly resource development.

Several submissions emphasized that the term “importance,” as used in the *Accord Acts*, requires a substantive, evidence-based interpretation. This includes demonstrating how principles influence actual decisions related to site selection, bid evaluation, licensing conditions, and ongoing oversight. Others cautioned that overly rigid or prescriptive requirements at early stages could create uncertainty, discourage investment, or impose obligations before proponents have sufficient project-specific information.

- **Indigenous groups and rights holders** argued that the *Accord Acts* principles, as currently applied, fail to account for the Crown’s duty to consult across the full sequence of offshore wind decisions. They emphasized that strategic-level decisions – such as legislative amendments, ministerial directions, and land tenure frameworks – shape outcomes in ways that directly affect Indigenous rights, and that consultation cannot be deferred to project-specific stages without undermining constitutional obligations.
- **The fishing sector** focused on whether the principles are being applied in a way that genuinely protects established ocean uses. Fishers expressed concern that the current approach risks narrowing the scope of consideration to defined WEAs or individual projects, rather than reflecting the interconnected nature of marine ecosystems and fishing activities.
- **Industry** generally supported the existing application of *Accord Acts* principles, noting that they are reflected in the proposed land tenure and Call for Bids framework. However, they emphasized the need for clarity, predictability, and proportionality, warning that uncertainty or excessive prescription could increase costs and delay development.
- **Government** emphasized that the *Accord Acts* principles provide a flexible but robust framework that can be adapted to offshore wind while maintaining consistency with existing offshore energy governance. Governments highlighted the importance of balancing policy objectives – such as economic development, reconciliation, and environmental protection – within a joint management context and noted that some discretion is necessary to respond to evolving information and market conditions.
- **Other interested stakeholders** broadly supported applying *Accord Acts* principles as a unifying governance lens, emphasizing transparency, evidence-based decision-making, and consistency across the regulatory lifecycle. However, they often expressed concern that without clearer articulation of how principles are applied in practice, discretion could undermine accountability.

## Theme: Indigenous Consultation, Rights, and Reconciliation

A central theme across submissions was whether offshore wind governance adequately reflects the Crown's duty to consult and aligns with reconciliation commitments. Several respondents emphasized that consultation must occur early, meaningfully, and throughout the continuum of decisions that shape offshore wind development, not solely at the project or permitting stage. Submissions highlighted the cumulative nature of offshore wind decisions and the risk that early strategic choices effectively predetermine outcomes before Indigenous concerns are addressed.

Respondents also stressed that participation of Indigenous communities should go beyond engagement to include concrete, resourced pathways for economic participation, governance involvement, and long-term benefits. This included calls for clearly defining under-represented groups, embedding commitments in licence conditions, and requiring measurable outcomes, reporting, and accountability.

- **Indigenous groups and rights holders** raised constitutional concerns, asserting that insufficient consultation at earlier stages risks infringing asserted and established rights under section 35 of the *Constitution Act, 1982*. They called for alignment with the *United Nations Declaration on the Rights of Indigenous Peoples Act* and for *Accord Acts* principles to be explicitly used to remedy current gaps in consultation and decision-making.
- **Industry** generally supported increased Indigenous participation and reconciliation objectives but cautioned that requirements should remain principle-based and adaptive, allowing commitments to evolve as project details, relationships, and technical information become clearer.
- **Government** submissions emphasized their responsibility to balance constitutional duties with orderly resource development. They highlighted existing and planned engagement mechanisms, noting that consultation approaches may evolve over time and vary by decision type. Some governments underscored the importance of distinguishing between strategic-level policy decisions and project-specific regulatory approvals when designing consultation processes.
- **Other interested stakeholders** emphasized that Indigenous participation and consultation are foundational to legitimacy and public confidence, supporting the use of bid criteria, participant funding, and binding licence terms to ensure commitments are implemented in practice.

## Theme: Consideration of Fishing Activities and Coexistence

Consideration of fishing activities emerged as one of the most detailed and strongly expressed themes. Many submissions argued that giving "importance" to fishing under the *Accord Acts* requires a broad, holistic understanding of fishing activities, extending beyond harvesting to include transit routes, seasonal patterns, safety, ecosystem dependencies, and interactions between fleets. Respondents emphasized that impacts cannot be assessed solely within Wind Energy Area boundaries and must account for displacement, cumulative effects, and indirect consequences.

Numerous submissions highlighted gaps in baseline data and monitoring, noting that without a robust understanding of existing fishing activities and marine ecosystems, it is difficult to assess impacts or demonstrate compliance with *Accord Acts* principles. Calls were made for early, proactive monitoring programs and ongoing consultation with fishing interests to inform licensing and project design.

- **Indigenous groups and rights holders** linked fisheries impacts to treaty and rights-based considerations, emphasizing that continuation of fishing livelihoods and cultural practices must be prioritized over displacement, particularly in areas with cumulative pressures.
- **The fishing sector** expressed concern that current processes risk minimizing or fragmenting consideration of fishing impacts. They emphasized the need for early engagement, fisheries-specific bid criteria, meaningful weighting in evaluations, clear buffer requirements, navigational safety measures, and avoidance-first approaches, with compensation viewed as a last resort rather than a substitute for coexistence.
- **Industry** generally agreed that fishing impacts should be considered early in the Submerged Land Licence process and supported design-based and engineering solutions to avoid or minimize impacts. However, they cautioned against requirements that assume impacts without evidence or impose obligations disproportionate to likely effects.
- **Government** submissions highlighted the need to balance protection of fishing activities with broader public interest considerations, including renewable energy development and climate objectives. Governments emphasized that coexistence frameworks, monitoring, and adaptive management would be key tools to manage impacts over time.
- **Other interested stakeholders** supported embedding fisheries considerations in non-price bid criteria and licence terms, emphasizing avoidance, mitigation, monitoring, and adaptive management to support long-term coexistence.

### Theme: Equity, Participation, and Canadian Content

Many submissions addressed how *Accord Acts* principles related to full and fair participation, under-represented groups, and Canadian involvement should be applied in offshore wind development. Respondents broadly supported the objective of increasing equitable access to economic opportunities but differed on how prescriptive requirements should be and how regional equity should be addressed.

Several submissions emphasized that participation commitments must be measurable and enforceable, with clear definitions of under-represented groups and transparent reporting mechanisms. Others highlighted the importance of early clarity to allow proponents to integrate workforce development, procurement, and supply-chain strategies into project planning.

- **Indigenous groups and rights holders** stressed that participation must translate into tangible benefits for communities most affected by offshore wind development, including localized procurement, training, and long-term employment pathways, particularly in regions such as Cape Breton.
- **Industry** supported Canadian participation and supplier development but cautioned that overly restrictive local content requirements could increase costs and reduce project viability. They emphasized proportionality, flexibility, and regional collaboration to balance economic benefits with competitiveness.

- **Government** emphasized that equity and Canadian content objectives should be advanced in a manner consistent with trade obligations, market realities, and project viability. They highlighted the role of bid criteria and licence conditions in setting expectations while retaining flexibility to adapt over time.
- **Other interested stakeholders** supported using bid criteria and licence conditions to advance equity objectives, noting that enforceable commitments and participant funding can help ensure inclusion is practical rather than symbolic.

### Theme: Governance, Transparency, and Regulatory Certainty

Governance and regulatory clarity were repeatedly identified as critical to delivering *Accord Acts* principles. Respondents emphasized the need for clear roles and responsibilities between governments and the regulator, transparent decision-making processes, and predictable timelines. Concerns were raised that concentrating policy promotion, regulation, and dispute resolution within the same institutions could create perceptions of bias and undermine public confidence.

Several submissions stressed that offshore wind should be governed with rigor comparable to other offshore energy activities under the *Accord Acts*, warning against parallel or fragmented processes that could weaken protections for existing ocean users. Others highlighted the importance of strategic direction from governments, with the regulator acting transparently and within clearly defined mandates.

- **Indigenous groups and rights holders** emphasized that weak governance and unclear accountability exacerbate risks to asserted and established rights, consultation obligations, and trust, particularly where cumulative impacts are not addressed.
- **The fishing sector** emphasized that weak governance and unclear accountability exacerbate risks to livelihoods, safety, and long-term access to fishing grounds, particularly where cumulative impacts and displacement effects are not adequately addressed.
- **Industry** emphasized that regulatory certainty, clear evaluation criteria, and predictable processes are essential to maintaining investor confidence and enabling orderly development.
- **Government** underscored the importance of maintaining joint federal–provincial management, clear statutory mandates, and transparent decision-making processes. They highlighted public reporting, guidance documents, and regulatory consistency as key tools to maintain confidence in the regime.
- **Other interested stakeholders** supported strong oversight, public reporting, and adaptive management as necessary to balance economic development with environmental protection and social legitimacy.

## > Community Benefits

Across submissions, there was strong consensus that community benefits must be a core, credible, and integral component of offshore wind development in Nova Scotia, rather than an ancillary or symbolic consideration. Respondents emphasized that community benefits should be clearly defined, grounded in evidence, and proportionate to the scale, duration, and impacts of offshore wind projects. While there was broad support for offshore wind as an economic opportunity, stakeholders consistently stressed that benefits must flow directly to communities and marine users directly impacted – particularly Indigenous communities, coastal and fishing-dependent communities, and rural regions – through mechanisms that are transparent, enforceable, and responsive to local priorities.

Many submissions cautioned against premature or overly prescriptive benefit commitments at early project stages, while others argued that minimum standards and enforceable frameworks are necessary to ensure equity, accountability, and social licence. Overall, feedback highlighted the need for a balanced, phased, and justice-oriented approach that delivers long-term, place-based value and supports reconciliation, coexistence, and durable community prosperity.

### **Theme: Defining Community Benefits and Who Should Benefit**

A dominant theme across submissions was the need for clarity, accountability, and precision in how community benefits are defined, who qualifies as a beneficiary, and how benefits are distinguished from compensation for losses. Many respondents stressed that community benefits should represent additional, positive value generated by offshore wind development, rather than vague promises, generalized provincial gains, or substitutes for impact mitigation.

There was widespread agreement that benefits should be geographically impact-based, prioritizing communities and marine users closest to development areas and those experiencing the greatest socio-economic, cultural, or livelihood impacts. This was framed as an issue of fairness and impact, rather than preferential treatment, with strong emphasis on coastal and rural communities. Several submissions emphasized that rural, coastal, and fishing-dependent communities are underrepresented in decision-making yet face disproportionate risks and therefore must be explicitly recognized as host or affected communities within any benefits framework. Others cautioned that overly narrow definitions could exclude communities indirectly affected through supply chains, labour markets, or regional infrastructure pressures, underscoring the importance of a transparent and principled approach to eligibility.

Submissions also highlighted the importance of distinguishing community benefits from compensation frameworks, noting they should be defined and enforceable, and that community benefits should complement – not substitute for – impact mitigation and safeguards. While compensation was widely supported where offshore wind causes demonstrable losses – such as employment impacts, reduced municipal revenues, or displacement of fishing activity – many respondents stressed that compensation alone does not constitute a community benefits program. There was strong emphasis that benefits should not replace or precede proper impact assessment, coexistence planning, or compensation where harm occurs. Instead, benefits should deliver forward-looking, long-term value that endures beyond construction and is not framed as a trade-off for accepting harm.

- **Indigenous groups and rights holders** consistently emphasized that community benefits must be understood in the context of unceded Mi'kmaw territory and grounded in recognition of Indigenous rights, title, and stewardship responsibilities. Benefits were framed not as discretionary contributions but as a necessary component of economic reconciliation, requiring parity with provincial-scale benefits derived from offshore wind. Submissions underscored that Mi'kmaw communities should be recognized as primary beneficiaries and decision-makers, with benefits reflecting long-term community priorities, cultural continuity, and intergenerational well-being.
- **The fishing sector** focused strongly on proximity and demonstrated impact as the basis for determining beneficiaries. Fishers emphasized that communities adjacent to WEAs, ports, and cable routes experience the most direct risks and disruptions and therefore should be explicitly prioritized. Many expressed concern that overly broad definitions of “community” could dilute benefits and divert resources away from fishing-dependent regions that face tangible livelihood and cultural impacts.
- **Industry** generally supported inclusive definitions of community benefits but emphasized the practical challenges of identifying affected communities early in the development process. Submissions highlighted uncertainty around final project footprints, landfalls, and onshore infrastructure and cautioned against rigid beneficiary definitions before these elements are known. Industry feedback stressed the importance of flexibility to allow benefits to align with actual impacts as projects evolve.
- **Government** submissions emphasized the importance of clearly identifying host and affected municipalities, particularly where onshore infrastructure, ports, transmission corridors, or increased service demands are anticipated. Governments highlighted that benefits should align with local planning priorities and reflect the fiscal and service pressures associated with industrial-scale development.
- **Other interested stakeholders** emphasized evidence-based definitions rooted in energy justice and fairness. These contributors stressed the importance of clearly distinguishing between baseline economic activity, such as general employment, and intentional benefit-sharing mechanisms designed to deliver additional, community-specific value.

### Theme: Timing, Phasing, and the Role of Socio-Economic Assessment

Many submissions underscored that community benefits programs must be informed by a robust understanding of offshore winds socio-economic impacts. A recurring view was that benefits should not be finalized until comprehensive federal or provincial socio-economic assessments are completed, particularly for coastal and fishing communities. Community benefits were framed as essential in building trust, reducing conflict, and supporting long-term success of offshore wind development.

Several respondents cautioned that committing to detailed or binding benefits too early – such as at the Submerged Land Licence or Call for Bids stage – risks misalignment with actual impacts, unrealistic expectations, and inequitable outcomes. At the same time, others argued that deferring benefits entirely undermines trust and social licence, especially where communities have experienced past development processes that failed to deliver promised value.

As a result, many submissions supported a phased approach: establishing clear principles, minimum standards, and expectations early in the process and aligned with project maturity, while allowing project-

specific benefit design to evolve later once affected communities, revenues, and infrastructure requirements are better understood. Early engagement was consistently emphasized as essential, even if final benefit mechanisms are developed later. Commitments that influence decisions are ultimately enforceable. Respondents stressed that community benefits must extend beyond short-term construction activity. Offshore wind projects are viewed as multi-decade developments, and benefits should reflect that timeframe through sustained employment, ongoing funding, and lasting economic participation. One-time payments or symbolic gestures were widely seen as insufficient.

- **Indigenous groups and rights holders** supported early clarity on overarching principles and expectations but stressed that meaningful benefits must be co-developed over time through sustained, relationship-based engagement. Submissions emphasized the need for adequate participant funding, access to technical expertise, and capacity support to enable informed decision-making throughout the project lifecycle.
- **The fishing sector** strongly advocated for socio-economic assessments to precede benefit design. Fishers emphasized that benefits must be grounded in documented impacts on fisheries, coastal economies, and municipal tax bases, and cautioned that premature commitments risk overlooking sector-specific losses or cumulative effects.
- **Industry** consistently cautioned against early financial commitments before project feasibility, revenues, and impacts are well understood. Submissions supported high-level statements of intent and principles at the bidding stage, with detailed benefit plans to follow once licences are awarded, and project parameters are clearer.
- **Governments** emphasized the importance of early engagement to identify potential infrastructure, housing, and service impacts, even if benefit agreements are finalized later. Submissions highlighted the value of early dialogue to support local planning and budgeting.
- **Other interested stakeholders** generally supported a phased approach but stressed that minimum standards, transparency, and clear expectations are still required early in the process to avoid ad hoc, inconsistent, or inequitable outcomes.

### Theme: Governance, Transparency, and Accountability

Strong emphasis was placed on the need for transparent, well-governed community benefits frameworks, with many submissions calling for provincial leadership in establishing clear and consistent community benefits frameworks. Many submissions expressed concern that without clear governance structures, benefit commitments risk being inconsistent, uncertain, difficult to administer, or vulnerable to power imbalances between communities and developers. Suggested approaches included provincial guidance, minimum standards, shared principles, and coordination to ensure equitable and predictable outcomes across projects.

Respondents frequently called for clear articulation of how benefits would be financed, collected, governed, and distributed, including eligibility criteria, oversight mechanisms, and reporting requirements. Many respondents emphasized that well-designed, transparent, and community-driven benefits can improve project acceptance and reduce delays, while poorly defined or symbolic approaches risk opposition and loss of social licence.

There was also significant support for a province-led or regulator-enabled framework that sets baseline expectations and principles, rather than leaving individual communities to negotiate alone. Respondents stated that consistent frameworks can still allow flexibility and innovation while ensuring fairness across regions and projects.

- **Indigenous groups and rights holders** emphasized Indigenous-led governance, self-determination, and community control over benefit mechanisms. Many highlighted the importance of Indigenous-managed trusts or agreements that reflect community priorities, cultural values, and long-term stewardship responsibilities.
- **The fishing sector** highlighted the need for accountable and transparent frameworks that prevent coercion or imbalance in negotiations. Submissions stressed that benefits should not be used to obscure, offset, or substitute for compensation related to demonstrable economic losses.
- **Industry** supported clear, predictable governance frameworks that reduce uncertainty and investment risk. However, submissions cautioned against overly prescriptive models that could limit flexibility, particularly in early or emerging offshore wind markets.
- **Government** feedback supported the use of Community Benefit Agreements or similar instruments, particularly where municipal infrastructure and services are affected. Submissions emphasized indexing benefits to project size, duration, and local impacts.
- **Other interested stakeholders** strongly advocated for enforceable requirements, public reporting, and embedding benefit obligations in licence conditions or regulatory instruments to ensure accountability and consistency and commitments are delivered over the life of a project.

### Theme: Economic Participation, Employment, and Local Supply Chain Development

Economic participation emerged as a central pillar of community benefits. Submissions consistently highlighted local employment, fair wages, workforce training, and supply chain participation as tangible, durable benefits that can extend beyond construction and support long-term regional development.

Many respondents emphasized the importance of a majority Canadian workforce, local hiring commitments, and partnerships with regional institutions ensure local workers can access jobs during construction and operations. Creating pathways for under-represented groups into skilled and long-term employment was noted. A recurring theme was the need for offshore wind to support local and regional businesses. Respondents emphasized opportunities in marine services, ports, fabrication, logistics, operations, and maintenance. Many called for clear expectations around local procurement and capacity-building, so offshore wind contributes to durable regional economic development rather than relying primarily on external suppliers.

- **Indigenous groups and rights holders** strongly supported targeted training programs, apprenticeships, and scholarships, in addition to pathways into skilled trades, professional, and leadership roles. Participants emphasized Indigenous-owned businesses, joint ventures, and procurement opportunities as key mechanisms for lasting economic participation.


- **The fishing sector** questioned whether offshore wind employment can realistically replace fishing livelihoods, emphasizing the cultural, intergenerational, and place-based nature of fisheries work. Fishers stressed that employment benefits must be assessed in relation to permanent impacts on coastal economies.
- **Industry** emphasized workforce development and supply chain participation as core benefits, while cautioning that employment numbers should be realistic, phased, and aligned with construction, operations, and maintenance timelines.
- **Government** submissions highlighted the importance of economic benefits that help offset infrastructure, housing, and service pressures associated with increased industrial activity and population growth.
- **Other interested stakeholders** supported economic benefits that are inclusive, place-based, and aligned with long-term regional development and just transition objectives.

### Theme: Revenue Sharing, Funds, and Financial Mechanisms

Many submissions discussed financial mechanisms such as community benefit funds, revenue sharing, and equity participation as key tools for delivering long-term value. Respondents emphasized that financial benefits should be predictable, transparent, and scaled to project size and duration.

Views differed on the appropriate mechanisms. Some strongly supported revenue sharing or equity participation, particularly for Indigenous communities, as a means of economic reconciliation and shared prosperity. Others cautioned that shared ownership can be complex and may not be appropriate for all communities, advocating instead for well-governed benefit funds.

There was broad agreement that financial benefits should be enforceable, clearly administered, and not treated as discretionary or goodwill gestures.

- **Indigenous groups and rights holders** strongly supported revenue sharing, equity participation, and Indigenous-controlled trusts as central to reconciliation, long-term self-determination, and economic sustainability.
  - **The fishing sector** focused primarily on compensation and direct financial benefits tied to demonstrated losses, expressing concern that generalized funds may not adequately address sector-specific impacts.
  - **Industry** generally favoured community benefit funds over shared ownership models, citing financing complexity and risk, and emphasized proportionality and predictability in financial obligations.
  - **Government** feedback supported Community Benefit Agreements with payments linked to capacity, production, or revenues to support local infrastructure and services.
  - **Other interested stakeholders** supported a continuum of financial models – from funds to ownership – provided they are transparent, equitable, and aligned with community capacity and governance.
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## Theme: Justice, Reconciliation, and Long-Term Community Value

Many submissions framed community benefits within broader principles of energy justice, reconciliation, and just transition. Respondents emphasized procedural justice (meaningful participation), distributive justice (fair allocation of benefits), and recognitional justice (respect for rights, culture, and lived experience). Many submissions emphasized the importance of including African Nova Scotian communities, rural coastal communities, and other under-represented or underserved groups, noting historical inequities and the importance of inclusive benefit design. Respondents noted that some communities face disproportionate impacts and limited political representation, and community benefits frameworks should be designed to address these inequities through targeted training, employment pathways, and community-directed investments.

Overall, participants stressed that community benefits should deliver long-term, locally held value that supports community resilience, cultural continuity, and intergenerational prosperity.

- **Indigenous groups and rights holders** explicitly framed benefits as instruments of reconciliation, stewardship, and self-determination, emphasizing long-term community control and intergenerational outcomes.
- **The fishing sector** emphasized cultural continuity, community identity, and the central role of fisheries in coastal heritage, stressing that benefits must be reflected more than economic metrics alone.
- **Industry** acknowledged justice-based principles but focused on practical, implementable approaches that align with project delivery and regulatory certainty.
- **Government** submissions emphasized fairness, consistency, and equitable treatment across communities and regions.
- **Other interested stakeholders** strongly advanced justice-based frameworks and enforceable standards to ensure lasting community empowerment and resilience.

## > Terms and Conditions to be Potentially Included in the Draft Submerged Land Licence


Across submissions, respondents emphasized that Submerged Land Licences (SLLs) for offshore wind must operate as enforceable performance-based instruments rather than passive tenure grants. While there was broad alignment on the value of clear, standardized licence terms to provide regulatory certainty and enable offshore wind development, respondents diverged significantly on how prescriptive, precautionary, and front-loaded those terms should be.

Overall, feedback underscored that SLL terms and conditions are viewed as foundational decisions that will materially shape project feasibility, environmental outcomes, and social licence throughout the full offshore wind lifecycle.

## Theme: Licence Duration, Structure, and Milestones

Respondents consistently identified licence duration and milestone design as fundamental to balancing long-term investment certainty with protection against speculative seabed holding. Many submissions cautioned that extended licence terms, if not paired with enforceable milestones and structured review points, could allow marine space to be tied up without assurance of development, benefits, or accountability. Others emphasized that offshore wind projects are capital-intensive and inherently long-term, requiring licence durations that realistically accommodate site assessment, permitting, financing, construction, operations, potential life extensions, and decommissioning.

Submissions reflected differing perspectives on the appropriateness of a minimum 35-year term and the option to extend up to 48 years. Several respondents stressed that licence duration should be clearly justified, transparent, and explicitly linked to credible project timelines rather than applied uniformly. There was also emphasis on defining discrete licence phases, with clear conditions for progression, extension, suspension, or termination, particularly where delays arise from factors beyond a proponent's control such as regulatory approvals, transmission availability, or broader policy decisions.

- **Indigenous groups and rights holders** expressed concern that long licence durations, such as 48 years, without mandatory review points could entrench adverse impacts on Aboriginal and treaty rights. Long-term tenure without reassessment risks locking in impacts across generations, particularly where baseline conditions, cumulative effects, or community priorities may change over time. Many respondents advocated for clearly phased licences with mandatory review, renewal, suspension, or revocation points tied to project progression, each requiring renewed consultation and Indigenous participation in decision-making. Several submissions stressed that licence milestones should be explicitly linked to demonstrated performance on consultation, environmental protection, and coexistence, rather than purely technical or financial progress.
  - **The fishing sector** strongly opposed long or inflexible licence durations that could enable speculative holding of marine space without active development. Submissions emphasized that extended licence terms could effectively remove fishing grounds from use for decades, even where projects do not advance. Many called for strict “use-it-or-lose-it” milestones, automatic termination or downsizing where milestones are missed, and clear authority to require relinquishment of unused portions of licensed areas. Fishers emphasized that milestone design must prioritize certainty for existing ocean users, not only project proponents.
  - **Industry** generally supported longer licence durations in the range of 35–48 years, arguing these are necessary to reflect the full offshore wind project lifecycle and to support financing, investment certainty, and long-term asset planning. Submissions emphasized the need for flexibility within and between licence phases, including extension mechanisms and protections against termination where delays result from factors outside developer control, such as regulatory approvals, grid availability, or government policy decisions. Industry respondents cautioned that overly rigid milestones or termination provisions could undermine bankability and deter investment.
  - **Government** submissions focused on ensuring that licence duration and milestone frameworks align with enforceable environmental, monitoring, and biodiversity obligations across the full lifecycle. Respondents emphasized the importance of clear phase definitions, regular review points, and the ability to adapt licence conditions over time in response to monitoring results, cumulative effects, or evolving policy objectives.
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- **Other interested stakeholders** generally viewed extended licence terms as acceptable only if paired with strong performance requirements and accountability mechanisms. Submissions emphasized the importance of clear authority to suspend, modify, or revoke licences in cases of environmental harm, failure to meet commitments, or non-delivery, and stressed that long tenure should not reduce regulatory leverage.

### Theme: Consultation, Engagement, and Decision-Making Authority

Many submissions emphasized that consultation and engagement should be treated as core components of licence design and oversight, rather than procedural requirements addressed later in project development. Respondents expressed concern that key SLL parameters may be determined too early – through strategic planning or bid-stage decisions – without sufficient opportunity for affected parties to meaningfully influence outcomes. Transparency around draft terms and conditions, timelines, and decision-making rationales was repeatedly highlighted as essential, with many respondents wanting to have the opportunity to comment on the draft terms and conditions before finalization since the ones presented were viewed as too general.

Submissions also reflected differing views on whether engagement plans and obligations should be embedded directly in SLL terms or addressed through subsequent permitting and authorization processes. While opinions varied on form and timing, there was broad agreement that meaningful, ongoing engagement is essential to maintaining social licence, regulatory legitimacy, and trust.

- **Indigenous groups and rights holders** emphasized that engagement must constitute formal consultation consistent with the Crown's duty to consult, including explicit recognition of Section 35 rights, with several submissions called for Indigenous representation in decision-making bodies. Respondents note that free, prior, and informed consent should be required, obtained, and enforced prior to activities and licences should be revoked for non-compliance. Submissions should be ongoing and tied to each licence.
- **The fishing sector** stressed the importance of early, informed, and continuous engagement, beginning before licence terms are finalized. Submissions emphasized that fishers must have access to draft SLL conditions, clear timelines, and understandable decision rationales. Many supported embedding enforceable consultation requirements in SLLs, alongside independent oversight, dispute resolution, or appeal mechanisms to address conflicts or unresolved concerns.
- **Industry** supported engagement in principle but cautioned against embedding highly prescriptive engagement obligations in SLL terms, suggesting these are better addressed through permitting and project-specific authorization processes where they can be tailored to site-specific contexts and evolve as projects advance. Industry respondents cautioned that overly rigid licence-level engagement requirements could introduce uncertainty or duplication.
- **Government** submissions highlighted the importance of inter-regulatory coordination and clarity regarding how consultation and engagement obligations under SLLs align with those in other regulatory processes. Respondents emphasized the need for clearly defined roles, responsibilities, and enforcement mechanisms to ensure engagement requirements are meaningful and consistent.
- **Other interested stakeholders** framed engagement as central to transparency, accountability, and

public confidence. Some advocated for third-party or arm-length oversight mechanisms to ensure engagement commitments are implemented consistently and credibly.

### Theme: Fisheries Coexistence, Compensation, and Access

Fisheries coexistence emerged as one of the most detailed and strongly articulated areas of feedback within this question. Respondents consistently emphasized that SLLs should not presume exclusive use of marine space and must explicitly protect existing fishing access, safety, and livelihoods. Many submissions argued that coexistence, mitigation, monitoring, and compensation frameworks should be defined and enforceable at the licensing stage, rather than deferred to later approvals.

Submissions emphasized robust baseline fisheries data collection, transparent and ongoing monitoring, adaptive management, and compensation mechanisms triggered by defined thresholds rather than post-hoc claims. There was also significant discussion of licence suspension or modification mechanisms, with differing views on appropriate triggers and safeguards. Across submissions, coexistence was framed as a priority objective, with displacement of fishing activity treated as a last resort.

- **Indigenous groups and rights holders** emphasized the requirement for co-developed coexistence frameworks that recognize Indigenous fisheries and food, social, and ceremonial uses. Submissions highlighted the importance of Indigenous participation in fisheries monitoring, data governance, and decision-making, and stressed that coexistence obligations should be enforceable through SLL conditions. Many Indigenous submissions also emphasized the need for financial assurance to cover decommissioning and environmental liabilities that could affect fisheries.
- **The fishing sector** called for fisheries-specific baseline research prior to licence issuance, predefined compensation frameworks, minimized exclusion zones, and enforceable coexistence obligations, compensation plans, and environmental assessments to be embedded directly in SLL terms. Submissions emphasized that coexistence should be measurable and enforceable, with clear triggers for mitigation, compensation, or licence suspension where impacts occur. Fishers stressed that compensation should not replace access wherever continued fishing is feasible.
- **Industry** generally supported coexistence principles but cautioned against rigid or overly detailed early-stage requirements, emphasizing the need for flexibility as project design, technology, and data evolve. Submissions stressed alignment between SLL terms and conditions and broader requirements related to coexistence, supply chain development, and monitoring to support efficient execution. Industry expressed concern about licence suspensions triggered by factors outside developer control, such as offtake mechanisms.
- **Government** submissions focused on environmental effects monitoring and coordination with fisheries regulators to ensure appropriate oversight. Respondents emphasized the need for coherent regulatory approaches that integrate SLL conditions with fisheries management frameworks.
- **Other interested stakeholders** emphasized that coexistence must be measurable, enforceable, and supported by clear accountability mechanisms, with transparent reporting and regulatory follow-through.

### Theme: Environmental Protection, Monitoring, and Adaptive Management



Respondents broadly agreed that SLLs must include clear, enforceable environmental protection measures across all licence phases. Submissions emphasized the importance of baseline data collection, ongoing monitoring, and adaptive management to address cumulative effects, seabed disturbance, sensitive habitats, and species at risk. Transparency in environmental monitoring and public reporting were repeatedly identified as key components of environmental accountability.

There was debate over when detailed environmental plans should be required, with differing views on whether these belong at licence issuance or later permitting stages, with some submissions noting they should be tied to activities, not the SLL. Despite these differences, respondents generally agreed that environmental obligations must be legally binding and not discretionary.

- **Indigenous groups and rights holders** emphasized precautionary approaches, clearly defined adaptive management triggers, and Indigenous participation in environmental monitoring and decision-making. Submissions stressed the importance of Indigenous access to environmental data and the inclusion of Indigenous knowledge in monitoring and management frameworks.
- **The fishing sector** focused on fisheries-relevant monitoring, protection of sensitive periods, and strict enforcement of activity restrictions. Several submissions emphasized the need for environmental contingency plans and agreed-upon compensation measures prior to licence issuance. Respondents noted that assessment of environmental effects should be done by a qualified third party and impacts to commercial species should be considered during all authorization stages.
- **Industry** supported environmental objectives but advocated for phased, proportionate requirements aligned with environmental assessment and permitting processes. Submissions cautioned against overly generic licence-level requirements and emphasized the need for site-specific, meaningful environmental plans developed through permitting.
- **Government** submissions emphasized mandatory biodiversity requirements, alignment with impact assessment decision statements, and clear data management and reporting obligations.
- **Other interested stakeholders** framed environmental monitoring as a core accountability tool, stressing transparency, public access to information, and enforceability.

### Theme: Financial Assurance, Decommissioning, and Long-Term Liability

Financial assurance and decommissioning obligations were widely viewed as essential safeguards to prevent long-term public and environmental liabilities. Many submissions emphasized that financial security must be sufficient, enforceable, and structured to cover full decommissioning, remediation, and potential environmental or socioeconomic damages, including in cases of insolvency.

Respondents also discussed the timing and structure of financial assurance, noting the need to balance early protection with the realities of long project lifecycles and evolving risk profiles.

- **Indigenous groups and rights holders** strongly supported upfront financial assurance covering full
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decommissioning and restoration. Submissions emphasized that financial security is essential to protecting rights, territories, and future generations, and stressed the need for robust enforcement mechanisms. Coexistence should be required and financial assurance to cover decommissioning and environmental liabilities should be included.

- **The fishing sector** emphasized requirements for early bonding and dedicated funds to address pollution, gear damage, and long-term impacts. Many stressed that financial assurance should be demonstrated prior to SLL issuance and include clear compensation provisions and should outline compensation packages and cover the cost of decommissioning.
- **Industry** supported financial assurance in principle but recommended phased or revenue-based approaches to reduce upfront burdens. Financial assurance should be reasonable and cover decommissioning over time.
- **Government** submissions highlighted the need for flexibility to accommodate evolving environmental obligations and changing risk over the project lifecycle.
- **Other interested stakeholders** viewed financial assurance as fundamental to public trust, accountability, and social licence.

### Theme: Fees, Rentals, Royalties, and Economic Structure

Respondents provided extensive feedback on seabed rentals, fees, and royalties, particularly regarding their timing and impact on early-stage project risk. Many argued that high early-stage costs could deter investment in an emerging market, while others emphasized the need to prevent speculation and ensure fair public value capture.

Several submissions supported staged or tiered payment models, with increased emphasis on operational-phase royalties rather than early development rent.

- **Indigenous groups and rights holders** placed focus on ensuring that fee structures support economic benefits, accountability, and rights protection. Submissions emphasized that financial frameworks should not undermine Indigenous participation or exacerbate inequities.
  - **The fishing sector** emphasized that fee structures should not incentivize speculative holding of marine space or shift financial risk onto fisheries or coastal communities. Several respondents suggested including royalty funded environmental effects models.
  - **Industry** strongly advocated deferring rental fees until construction or operation and aligning payments with revenue and route-to-market certainty, citing financial assurance should be reasonable, due at year end, and cover decommissioning over time. Submissions emphasized the importance of predictability and competitiveness. Some respondents noted there should be low royalty rates for locally provided electricity, and higher royalty rates for exported electricity.
  - **Government** submissions considered fees within broader policy and regulatory objectives, including public value capture and market development.
  - **Other interested stakeholders** linked fees to performance, local benefits, and the prevention of land banking.
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## Theme: Community Benefits, Workforce, and Supply Chain Development

Respondents consistently emphasized that SLLs are a key policy lever for ensuring offshore wind development delivers tangible, place-based benefits, particularly for communities most directly affected. Many submissions stressed that community benefits should be supported by clear expectations, transparency, and accountability mechanisms, rather than framed solely as aspirational commitments.

While recognizing that early-stage projects may have limited immediate impacts, respondents emphasized the importance of setting clear benefit pathways at the licensing stage to shape long-term outcomes. Views differed on the level of prescription appropriate within SLL terms, but there was shared emphasis on clarity regarding how benefits will be defined, measured, reported, and enforced.

- **Indigenous groups and rights holders** consistently emphasized that community benefits must be grounded in Indigenous rights, partnership, and long-term participation rather than treated as discretionary outcomes. Submissions highlighted Indigenous equity participation, procurement opportunities, employment pathways, and capacity-building as central expectations. Respondents stressed that benefits should be co-developed, reflective of Indigenous priorities, and extend beyond construction into long-term operational and governance roles, with clear accountability mechanisms.
- **The fishing sector** generally framed community benefits through the lens of livelihood continuity and economic stability rather than broader regional development objectives. Submissions emphasized that benefits should not be used to offset or justify adverse impacts on fisheries. Where broader benefits were discussed, respondents highlighted localized investments – such as port infrastructure or marine services – that directly support fishing communities, stressing that these should complement, not replace, coexistence and compensation measures.
- **Industry** supported the objective of delivering community benefits but emphasized flexibility, proportionality, and alignment with project maturity. Submissions cautioned that highly prescriptive or front-loaded benefit requirements at the SLL stage could introduce risk and uncertainty, particularly given the limited development of domestic supply chains in early phases. Respondents supported phased commitments that evolve as project certainty increases.
- **Government** submissions generally framed community benefits within broader policy objectives, including regional economic development, workforce transition, and alignment with *Accord Acts* principles. Respondents emphasized transparency, consistency across projects, and coordination with labour, training, and economic development programs to ensure benefits are measurable and aligned with public interest outcomes.
- **Other interested stakeholders** advocated for stronger, enforceable community benefit requirements embedded directly in SLL terms. Submissions emphasized binding commitments related to local employment, supply chain participation, and regional economic retention, with clear benchmarks, reporting templates and obligations, and enforcement mechanisms. Community benefits were framed as a core component of social licence and public trust.

## Theme: Transparency, Accountability, and Enforcement



Across submissions, respondents emphasized that transparency and enforcement are foundational to the credibility and effectiveness of SLLs. Many respondents stressed that SLL terms and conditions must be clear, public, and enforceable to allow regulators, rights holders, and other ocean users to understand expectations and assess compliance. Transparency was repeatedly linked to public trust, social licence, and confidence in offshore wind governance.

Submissions also emphasized the importance of robust enforcement tools, including the ability to modify, suspend, or revoke licences in response to non-compliance, unanticipated impacts, or failure to deliver on commitments. While respondents generally supported strong enforcement mechanisms, views diverged on the degree of discretion that should be afforded to regulators versus the need for clear, predictable triggers to avoid uncertainty.

- **Indigenous groups and rights holders** emphasized accountability mechanisms tied to consultation, rights protection, and environmental performance. Submissions stressed that transparency around compliance and enforcement is essential to trust, and that clear consequences must exist where commitments related to consultation, mitigation, or monitoring are not met.
- **The fishing sector** supported public registries of licence conditions, monitoring results, and commitments, as well as automatic or clearly defined consequences for non-performance. Submissions emphasized that transparency is necessary to understand how fisheries impacts are being managed and to ensure timely corrective action where harms occur.
- **Industry** supported clarity and consistency in enforcement but cautioned against discretionary or open-ended powers that could undermine financing and bankability. Submissions emphasized the importance of clearly defined terms in the SLL, outcome-focused milestones, and enforcement mechanisms aligned with realistic development timelines and site-specific conditions.
- **Government** submissions focused on aligning enforcement with existing regulatory frameworks and ensuring coordination across agencies. Respondents emphasized the need for clear authority, consistency, and proportionality in enforcement actions to maintain regulatory credibility.
- **Other interested stakeholders** framed SLLs as performance contracts requiring real consequences for failure. Submissions emphasized that transparency, public reporting, and enforceable conditions are essential to ensuring offshore wind development delivers intended environmental, social, and economic outcomes.

## ➤ Participant Funding Program

Feedback received for a Participant Funding Program (PFP) demonstrated broad support for the establishment and expansion of program with strong convergence around the need for adequate, accessible, long-term, and independently administered funding. Differences among respondent groups tended to relate to the perceived sufficiency of the current program specifically in place for offshore wind Call for Information NS25-1R, and the scale of funding required, rather than the underlying principle that participant funding is essential to meaningful, equitable participation in offshore wind decision-making.

## Theme: Adequacy of Participant Funding to Enable Meaningful Participation

Across submissions, respondents consistently emphasized that meaningful participation in offshore wind planning and regulatory processes depends on access to sufficient financial resources. Many respondents argued that the current or introductory PFP, focused primarily on reimbursing travel, honoraria, and translation, does not reflect the real costs of engagement in complex, technical, and long-term offshore wind processes. Submissions highlighted that reviewing large volumes of technical material, responding to compressed timelines, participating in multiple regulatory stages, and engaging communities require sustained staff time, specialized expertise, and organizational capacity.

Several respondents framed adequate funding as a prerequisite for legitimacy, fairness, and credibility of the overall process. Without it, participation was described as symbolic or procedural rather than substantive. Others noted that insufficient funding risks excluding those most affected – particularly Indigenous communities, fisheries, and coastal communities – while privileging well-resourced groups who could absorb participation costs internally.

- **Indigenous groups and rights holders** strongly emphasized that adequate funding is essential to uphold meaningful engagement and participation. Submissions stressed the need for funding to secure independent legal, technical, and scientific expertise, and noted that inadequate resources undermine the ability of Mi'kmaq communities to respond effectively as offshore wind initiatives progress. Funding was framed as foundational to respecting rights and supporting informed decision-making.
- **The fishing sector** consistently described existing funding as inadequate and misaligned with actual participation costs. Fishing organizations and individual harvesters highlighted the significant unfunded burden of staff time, data analysis, technical review, and member engagement, noting that without adequate compensation, continued participation is not financially feasible.
- **Industry** generally supported the concept of participant funding to improve the quality and efficiency of engagement and regulatory outcomes. While many industry submissions acknowledged the importance of sufficient funding to enable informed participation by others, some indicated that the current program already meets its intended purpose or expressed concern about proportionality and scope.
- **Other interested stakeholders** strongly supported adequate funding, emphasizing that without it, participation by affected communities and public-interest groups would be constrained. Several framed funding adequacies as central to equity and inclusive decision-making.

## Theme: Scope of Eligible Expenses and Cost Coverage

A dominant theme across submissions was the need to expand the scope of eligible expenses beyond basic reimbursement. Many respondents argued that meaningful participation requires coverage for professional fees, staff time, technical and scientific analysis, legal advice, community engagement activities, and administrative costs. Limiting eligibility to travel, meetings, and translation was widely described as insufficient given the complexity and duration of offshore wind development.

Submissions emphasized that participation often involves preparatory work outside formal meetings,

including reviewing guidance and documentation, commissioning independent studies, consulting with members or communities, and synthesizing feedback. Without recognition of these costs, respondents reported absorbing substantial unrecovered expenses.

- **Indigenous groups and rights holders** called for eligible expenses to include independent advisors, traditional knowledge studies, translation beyond written submissions, and staff or organizational capacity costs. Several submissions emphasized the importance of funding culturally appropriate engagement and Indigenous knowledge holders.
- **The fishing sector** placed strong emphasis on covering staff time, data acquisition and analysis, expert technical review, and organizational overhead. Fishing stakeholders highlighted that the current reimbursement model does not reflect the operational realities of fishing organizations or individual harvesters.
- **Industry** generally supported broader eligibility, particularly for independent technical, legal, and environmental expertise, noting that this can improve the quality of feedback and regulatory efficiency. Some industry respondents emphasized the need for clearly defined and scoped eligible costs.
- **Other interested stakeholders** strongly supported expanded eligible expenses, including technical experts, community engagement facilitation, accessibility supports, and administrative costs, to ensure informed and inclusive participation.

### Theme: Timing, Duration, and Long-Term Nature of Funding

Many submissions emphasized that participation in offshore wind development is not a one-time activity but a long-term commitment spanning planning, bidding, assessment, construction, operations, monitoring, and decommissioning. Respondents argued that short-term or one-off funding tied only to early engagement stages is inadequate.

Respondents highlighted the need for multi-year – or in some cases, multi-decade – funding structures that reflect the lifecycle of offshore wind projects. Early access to funding was also identified as critical to allow participants to prepare informed submissions and engage proactively rather than reactively.

- **Indigenous groups and rights holders** emphasized the importance of funding that extends beyond initial engagement and consultations to support ongoing engagement, capacity building, and long-term involvement throughout project lifecycles.
- **The fishing sector** strongly supported multi-year funding, noting that offshore wind development will require sustained monitoring, data analysis, and engagement over many years. Several submissions suggested minimum funding periods (e.g., five years or longer).
- **Industry** generally supported extending funding beyond initial engagement and consultation stages to enable continuity in technical working groups and monitoring, while emphasizing alignment with key regulatory milestones.
- **Other interested stakeholders** emphasized that long-term funding is essential to avoid engagement fatigue and to ensure that participation remains informed as projects evolve.

### Theme: Funding Delivery Model (Advance Funding vs. Reimbursement)

A significant cross-cutting theme was criticism of reimbursement-only funding models. Many respondents argued that requiring participants to incur costs upfront creates barriers for communities and organizations with limited financial capacity. Advance or upfront funding was widely recommended to level the playing field and enable equitable participation.

Several submissions referenced the Impact Assessment Agency of Canada's participant funding model as a preferred approach, citing its use of upfront funding, rolling intakes, and broader eligible expenses.

- **Indigenous groups and rights holders** strongly favored advance funding, noting that reimbursement models place undue financial risk on communities and undermine the ability to engage meaningfully.
- **The fishing sector** consistently opposed reimbursement-only approaches, highlighting that fishing organizations and harvesters cannot absorb upfront costs for extended engagement.
- **Industry** submissions supported advance or partial upfront funding to ensure equitable participation, though some emphasized the need for accountability and clear program design.
- **Other interested stakeholders** broadly supported upfront funding, framing it as essential to reducing participation barriers and supporting inclusive engagement.

### Theme: Equity, Accessibility, and Local-First Participation

Equity emerged as a central theme, with many respondents stressing that participant funding should prioritize those most directly affected by offshore wind development. Submissions emphasized the importance of accessibility, clear communication, and eligibility criteria that do not disadvantage smaller, under-resourced, or regionally based groups.

Several respondents argued for a "local-first" approach, particularly in relation to Cape Breton and the Sydney Bight, cautioning against centralized or Halifax-centric engagement models.

- **Indigenous groups and rights holders** emphasized equitable distribution of funding among Mi'kmaq communities, with priority for those closest to proposed development areas, while ensuring all communities can participate.
- **The fishing sector** highlighted inequities between well-resourced government or NGO stakeholders and fishing organizations, calling for funding models that recognize the sector's limited financial capacity.
- **Industry** generally supported participant funding as a mechanism to broaden participation and ensure a diversity of voices, while emphasizing clarity and consistency in eligibility.
- **Other interested stakeholders** strongly emphasized local-first funding, accessibility, and transparency, particularly for Cape Breton communities, African Nova Scotian communities, and other historically underserved groups.

## Theme: Governance, Transparency, and Independence of the Program

Many submissions stressed the importance of transparent, regulator-administered participant funding that is independent of project proponents. Respondents argued that funding controlled or influenced by developers could undermine trust, create conflicts of interest, and limit participants' ability to critique or negotiate effectively.

Clear eligibility criteria, transparent decision-making, public reporting on funding allocations, and predictable timelines were commonly cited as necessary elements of good program governance.

- **Indigenous groups and rights holders** emphasized independence from developers and, in some cases, joint or Indigenous-informed governance structures to ensure trust and legitimacy.
- **The fishing sector** supported regulator-administered funding and called for clarity on roles and responsibility for financing and administering the program.
- **Industry** generally supported transparent, regulator-led administration to ensure neutrality and consistency across projects, while emphasizing the importance of predictable processes.
- **Other interested stakeholders** strongly supported transparent governance, public reporting, and independent administration as foundations for credible engagement.

## ➤ Additional Feedback and Comments

Submissions consistently emphasized that the success of offshore wind development depends on credible governance, early and meaningful engagement, robust science, precautionary decision-making, and equitable distribution of risks and benefits. While perspectives differed by respondent group, the below cross-cutting themes reflect shared concern about getting the foundations right before development proceeds at scale.

### Theme: Governance, Process Integrity, and Regulatory Credibility

A dominant cross-cutting theme concerns the overall design, sequencing, and credibility of the offshore wind governance framework. Across submissions, respondents emphasized that confidence in offshore wind development depends less on individual project details and more on whether the regulatory system is transparent, independent, evidence-based, and perceived as fair.

Many submissions argue that key decisions, such as Wind Energy Area identification, licensing frameworks, and offshore wind Call for Bids design, are proceeding too quickly and without sufficient foundational information. Respondents repeatedly noted that advancing irreversible decisions before completing baseline studies, cumulative effects assessments, or socioeconomic analyses undermines trust and increases the risk of conflict, legal challenge, and long-term public opposition. Several submissions expressed concern that the same institutions appear to be responsible for policy promotion, system design, licensing, oversight, and compensation, which was viewed as creating real or perceived conflicts of interest.

Respondents also emphasized the importance of independent oversight, appeal mechanisms, and

enforceable commitments. There were repeated calls for clearer accountability structures, transparency in how decisions are made, and mechanisms to ensure that commitments made by developers, particularly those arising from non-price bid criteria, are legally binding and enforceable through licensing and financial assurance. Without these safeguards, respondents cautioned that regulatory credibility could erode over time.

- **Indigenous groups and rights holders** emphasized governance through the lens of constitutional and rights-based obligations. Concerns focused on whether consultation frameworks align with Supreme Court of Canada jurisprudence, section 35 of the *Constitution Act, 1982*, and Canada's obligations under the *United Nations Declaration on the Rights of Indigenous Peoples Act*. These submissions stressed that governance failures are not merely procedural but risk infringing Indigenous rights.
- **The fishing sector** framed governance concerns around fairness, independence, and protection from disproportionate harm. They highlighted fears of subtle pressure or retaliation due to government control over licences and allocations and questioned the legitimacy of processes where assessments occur after key decisions are already underway.
- **Industry** submissions emphasized governance clarity and predictability as prerequisites for investment. While generally supportive of offshore wind, they cautioned that poorly designed governance – unclear timelines, misaligned risk allocation, or inflexible qualification rules – could deter credible developers and increase costs.
- **Government** submissions emphasized the need for clear legislative authority, role clarity between regulators and policy-makers, and governance structures that can withstand legal, political, and public scrutiny. These submissions often focused on maintaining public confidence while delivering policy objectives within statutory mandates.
- **Other interested stakeholders** focused on governance credibility as a foundation for public trust, emphasizing transparency, enforceability, and alignment with legislative mandates such as ecological integrity, wildlife protection, and municipal capacity.

### Theme: Timing, Sequencing, and Meaningful Engagement

Another pervasive theme is the timing and sequencing of engagement, with many respondents asserting that consultation is occurring too late to meaningfully influence outcomes. Submissions repeatedly stated that engagement is most effective when it occurs at strategic planning stages –before parcels are finalized, licences are issued, or bid parameters are locked in – rather than after decisions are largely predetermined.

Several submissions criticized compressed timelines and accelerated processes that limit their ability to review technical material, assess risks, or engage their own experts. Respondents argued that efficiency should not override scientific certainty, rights-based obligations, or the need for informed participation. There was broad concern that rushed processes increase the likelihood of errors, conflict, and long-term delays.

Engagement was also framed as an ongoing obligation, not a one-time consultation. Many submissions emphasized the need for continued dialogue throughout planning, site assessment, construction, operation, and decommissioning, supported by clear feedback loops showing how input is considered and incorporated.

- **Indigenous groups and rights holders** emphasized early, continuous, and co-designed engagement, particularly at policy and regulatory development stages. They stressed that consultation delayed until project-specific authorizations fails to meet legal standards and undermines reconciliation.
- **The fishing sector** focused on the practical impacts of timing, noting that short consultation windows and incomplete information prevent meaningful review and place an unfair burden on fishing organizations and individual harvesters.
- **Industry** generally supported structured engagement but emphasized the need for clarity and efficiency. They favoured early workshops, bilateral discussions, and early release of draft licence terms to reduce uncertainty and avoid late-stage redesign.
- **Government** submissions emphasized the challenge of balancing timely decision-making with meaningful consultation obligations. They highlighted the need for engagement processes that are both procedurally fair and operationally feasible within policy and regulatory timelines.
- **Other interested stakeholders** highlighted engagement as essential for legitimacy, data quality, and adaptive management, stressing that early involvement reduces conflict and improves outcomes over the project lifecycle.

### Theme: Scientific Uncertainty, Data Gaps, and the Precautionary Approach

Concerns about scientific uncertainty and data gaps were raised across nearly all submissions. Submissions consistently emphasized that offshore wind development is being contemplated in the absence of sufficient baseline data on marine ecosystems, fisheries, oceanography, wildlife, cumulative effects, and human safety.

Many respondents called for long-term baseline research and monitoring before major decisions are made, arguing that without this information it is impossible to accurately assess impacts or design effective mitigation. The need for cumulative effects assessment – across multiple projects, stressors, and timeframes – was repeatedly emphasized, particularly in regions already experiencing pressure from other marine uses and conservation measures.

A strong precautionary theme emerged, with several submissions arguing that where uncertainty is high, development should proceed slowly, with enforceable thresholds, adaptive management, and the ability to halt or decommission projects if impacts exceed acceptable limits.

- **Indigenous groups and rights holders** emphasized the integration of Indigenous knowledge alongside western science, including Indigenous involvement in study design, interpretation, and governance of data. Data sovereignty and intellectual property were highlighted as critical considerations.
- **The fishing sector** focused on gaps in baseline fisheries science, cumulative effects on fish stocks and habitat, and risks to safety, markets, and livelihoods. They emphasized that uncertainty disproportionately affects fishing communities because impacts may be irreversible.
- **Industry** acknowledged uncertainty but focused on the need for early access to existing data, clear

methodological guidance, and predictable requirements. They cautioned that unmanaged uncertainty increases project risk and cost.

- **Government** submissions emphasized evidence-based decision-making, standardized methodologies, and regulatory defensibility. They highlighted the need to balance precautions with policy objectives and to ensure that data requirements are proportionate and enforceable.
- **Other interested stakeholders** emphasized rigorous, transparent, and standardized data collection, long-term monitoring, and public access to data to support adaptive management and public trust.

### Theme: Cumulative Effects, Coexistence, and Long-Term Sustainability

A further cross-cutting theme concerns cumulative effects and coexistence between offshore wind and existing ocean uses. Many submissions stressed that impacts cannot be assessed on a project-by-project basis alone but must consider the combined effects of multiple wind projects, marine protected areas, fishing activity displacement, and other offshore developments.

Submissions repeatedly emphasized that coexistence must be demonstrated in practice, not assumed in principle. Several respondents warned that incremental loss of access, habitat alteration, or navigation constraints could, over time, undermine the viability of established industries and coastal communities.

- **Indigenous groups and rights holders** highlighted cumulative impacts on rights, cultural practices, and stewardship responsibilities, stressing that incremental impacts can collectively amount to significant rights infringement.
- **The fishing sector** expressed the strongest concerns about cumulative displacement, loss of fishing grounds, and long-term industry viability. They emphasized that fishing is a multi-generational economic and cultural activity that cannot simply relocate.
- **Industry** submissions framed coexistence as achievable with proper planning, spatial analysis, and coordination, but emphasized the need for clear rules, thresholds, and predictability.
- **Government** submissions emphasized cumulative effects as a regional planning and governance challenge, highlighting the need for coordination across departments, regulators, and jurisdictions.
- **Other interested stakeholders** emphasized cumulative effects as central to ecosystem integrity, calling for regional-scale planning, shared monitoring, and adaptive management frameworks.

### Theme: Economic Risk, Cost Distribution, and Public Interest

Finally, many submissions raised questions about who bears the risks and costs of offshore wind development and how public benefits are ensured. Concerns were raised about electricity affordability, transmission costs, ratepayer exposure, and whether economic benefits will be equitably distributed.

Several respondents questioned how offshore wind would deliver tangible benefits to Nova Scotians, particularly if costs increase or if revenues flow primarily to developers and governments rather than affected communities.

- **Indigenous groups and rights holders** emphasized economic risk through a rights-based and intergenerational lens, noting that offshore wind development, if pursued without adequate consultation, baseline data, and cumulative-effects assessment, could shift long-term economic, cultural, and stewardship costs onto Indigenous communities.
- **The fishing sector** emphasized the risk of economic loss and inadequate compensation, stressing that new industries should not displace long-standing ones.
- **Industry** submissions focused on risk allocation, offtake certainty, and transmission planning, arguing that poorly structured risk increases costs for both developers and ratepayers.
- **Government** submissions emphasized balancing affordability, economic development, and policy objectives. They highlighted considerations related to ratepayer protection, infrastructure planning, and long-term system resilience.
- **Other interested stakeholders** highlighted broader public-interest considerations, including infrastructure strain, community benefits, local capacity, and long-term economic resilience.



## What Happens Now

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Following the close of offshore wind Call for Information NS25-1R on January 13, 2026, the CNSOER reviewed and analyzed all feedback received from Indigenous groups and rights holders, the fishing sector, industry, government, and other interested stakeholders through a variety of mechanisms, including written feedback, virtual and in-person meetings, a virtual public information webinar, and parcel nominations.

This What We Heard report has summarized key themes captured during the public engagement period. The feedback summarized in this What We Heard report will be considered when the CNSOER makes an offshore renewable energy recommendation to the federal and provincial Ministers to make an offshore wind Call for Bids. The Regulator's recommendation to Ministers will outline the details of the Call for Bids, including bidding criteria and how it will be assessed, terms and conditions for a Submerged Land Licence, and location(s) of parcel(s) that may be available for bid.

During and after the review of the feedback received, the subsequent actions were taken by the CNSOER include:

- Provided written submissions to federal and provincial government departments, including Natural Resources Canada, and the Nova Scotia Department of Energy. It is important to note that some feedback received is regarding decisions and policies outside of the CNSOER's mandate, and these were relayed to governments for their review and consideration.
- Further meetings with representatives from Indigenous groups and rights holders, the fishing sector, industry, government, and other interested stakeholders to obtain supporting and/or clarifying information.
- Engaged with consultants and others to collect additional information on the topics included in the offshore wind Call for Information NS25-1R.
- Highlighted key themes and issues that have potential to impact Indigenous groups and rights holders, the fishing sector, industry, government, and other interested stakeholders throughout the various phases of the offshore wind land tenure and authorizations processes.

It is important to note that analysis of the feedback collected during offshore wind Call for Information NS25-1R will continue to be assessed and applied to inform ongoing regulatory work to refine approaches, identify issues requiring further consideration, and determine what additional information may be needed in subsequent phases of the offshore wind land tenure and authorizations processes.

## Next Steps

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The CNSOER would like to thank Indigenous groups and rights holders, the fishing sector, industry, governments, the public, and other interested stakeholders who participated in the offshore wind Call for Information NS25-1R. Respondents provided a wide range of perspectives and information, including areas of alignment and differing views. The feedback collected throughout this process is valuable in helping the CNSOER to understand the issues that matter most to those with interests in, or potential to be affected by, future decisions and activities as they relate to the offshore wind land tenure process.

This What We Heard report reflects the feedback received during the offshore wind Call for Information NS25-1R process. The inclusion of perspectives in this report does not imply endorsement, agreement, or that a particular suggestion will be adopted. The What We Heard report summarizes themes and perspectives expressed by respondents and is intended to support transparency by documenting what was shared, while respecting confidentiality considerations.

To ensure the offshore wind Call for Information NS25-1R is fair and transparent, the CNSOER has published this What We Heard report on its website. Where feedback has been provided in confidence, it has been handled in accordance with applicable requirements. Feedback of confidential nature (e.g. Indigenous knowledge) or those that have requested their feedback not be shared publicly, have not been published in the What We Heard report.

**Appendix A** is a summary document of written feedback received through the offshore wind Call for Information NS25-1R [digital feedback form](#). Unless marked as confidential or the respondent has requested that their feedback or company name not be shared publicly, the summary document includes feedback verbatim with no edits except for the removal of any profanities and inappropriate language.

The CNSOER remains committed to transparent and respectful engagement. As the offshore wind land tenure process continues, the CNSOER will communicate updates, next steps, milestones, or decisions when available. Where additional engagement or consultation opportunities are planned, details and timing will be shared through established channels. If a Submerged Land Licence is issued as a result of this offshore wind land tenure process, please be assured that engagement with Indigenous groups and rights holders, the fishing sector, industry, governments, the public, and other interested stakeholders will continue if activity authorization applications are submitted to the CNSOER for consideration.

For more information on the offshore wind land tenure process, please [visit our website](#).