



April 28, 2026

## **Energy NL Submission to the Impact Assessment Agency of Canada**

### **Re: Draft Cooperation Agreement between Newfoundland and Labrador and Canada on Environmental and Impact Assessment**

#### **Introduction**

Energy NL was founded in 1977 to represent the supply and service sector of the energy industry. Today Energy NL represents over 500 member organizations worldwide which are involved in, or benefit from, the energy industry of Newfoundland and Labrador. Energy NL members are a diverse representation of businesses involved in a range of activities related to both renewable and non-renewable energy development, construction, and operations. This includes, but is not limited to, areas such as direct offshore and onshore supply; health and safety equipment and training; engineering solutions and fabrication; law firms, and human resource agencies.

Energy NL supports all efforts by both the Government of Newfoundland and Labrador and the Government of Canada to improve the environmental assessment process of major projects and we provide the following comments for the consideration of both levels of government.

#### **Comments on Environmental Assessment of Major Energy Projects**

Energy NL fully agrees that working towards a “one project, one review” approach for environmental assessment with the goal of a single assessment for major projects is an important and necessary step to improve Canada’s competitiveness for investment. As such, we fully support the draft cooperation agreement and the improvements that can be expected for onshore energy projects.

We understand that the draft cooperation agreement is not intended for offshore energy projects, and improvements to the process for such projects would need to be addressed separately. Newfoundland and Labrador’s offshore oil and gas industry is a major contributor to the economy of both our province and Canada. Newfoundland and Labrador is also a proven supplier of a responsibly produced product to the world – with 26% of Newfoundland and Labrador’s offshore crude production being shipped to Europe since 2016, and the potential to produce and ship more to help alleviate the energy crisis facing Europe. Canada’s European allies are seeking such energy sources and Newfoundland and Labrador can provide a solution during the period of energy evolution.

While a longer-term opportunity, our province also has a tremendous offshore wind resource, and having a clear environmental assessment process for development of this resource is important. Energy NL recognizes the important steps taken by both levels of government to advance offshore wind development in Canada, as evidenced by the offshore wind regional assessments undertaken in Newfoundland and Labrador and Nova Scotia.

For offshore oil and gas projects in Newfoundland and Labrador, the environmental assessment process is complex and lengthy. Other jurisdictions have more efficient approaches to their environmental approval processes while at the same time ensuring protection of the environment and compliance with health and safety requirements. As an example, the environmental assessment process for the Bay du Nord project took nearly four years. The project description was registered in June 2018 and project approval was announced in April 2022. In Norway, one project in the Barents Sea with similarities to the Bay du Nord project, called the Johan Castberg project, was approved in approximately six months. This project's plan for development and operations, including the impact assessment, was filed with the appropriate authorities in December 2017 and the project received approval in June 2018. In an increasingly competitive investment climate, these projects demonstrate the need for Canada to have clear, consistent, and concise regulations.

As both levels of government look to improve the environmental assessment process with consideration of Canada's investment attractiveness, actions also need to be identified and undertaken related to offshore energy development. Measures such as incorporating consideration of aspects of impact assessments of existing projects, particularly for common, standardized aspects of new projects, could contribute towards such a goal. The Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador is a recent and successful example of a model that should be in practice. Energy NL requests that both governments prioritize such work, to increase Canada's competitiveness for offshore energy investments, just as they seek to do for investments in other industries.

Energy NL appreciates the opportunity to provide comments on the draft cooperation agreement. We support efforts to improve the environmental process for all types of major energy projects and are willing to provide continued input as both levels of government develop and implement policy measures related to energy development in Newfoundland and Labrador.



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