

**Submission to the Department of Environment and
Climate Change
on the
*Environmental Preview Report of the North
Atlantic Wind to Hydrogen Project***

May 1, 2026

Contact: Charlene Johnson, CEO
cjohnson@energynl.ca
100 New Gower Street, Cabot Place
Suite 902
St. John's, NL A1C 6K3



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 fabricators; law firms and human resource agencies.

Energy NL and our members are excited about the prospects in the province for a new renewable energy industry, and we are pleased to participate, via this submission, in the Environmental Assessment for the proposed North Atlantic Wind to Hydrogen Project.

Project Rationale

As indicated in Energy NL's submission on August 21, 2025, in response to North Atlantic's Wind to Hydrogen Project Environmental Assessment Registration, there is strong rationale for the project, given:

- Clean hydrogen is recognized globally as a key factor in meeting international energy and climate goals by decarbonizing the energy system, as well as contributing to global energy security.
- The Government of Canada has demonstrated that developing a low-carbon hydrogen economy is a strategic priority through the release of reports such as Canada's Hydrogen Strategy and the Canadian Hydrogen Codes and Standards Roadmap.
- The Government of Newfoundland and Labrador has taken steps to advance a green hydrogen industry in the province.

The North Atlantic Wind to Hydrogen Project is focused on producing economically viable green hydrogen for export to international markets, which will contribute to the reduction of greenhouse gas emissions globally while simultaneously increasing market demand with end-use hydrogen able to be used in a range of sectors (e.g., transportation, power generation, heavy industry, etc.). This project is unique to the region as the project incorporates Liquid Organic Hydrogen Carriers (LOHCs) as its hydrogen derivative for storage and transportation, enabling the use of existing infrastructure at the North Atlantic Refining Limited Logistics Terminal, reducing upfront costs, decreasing construction time and additional land disturbances, and allowing easy integration into North Atlantic's existing fuel business.

Project Benefits

Substantial benefits have already been seen, and are expected to continue from the North Atlantic Wind to Hydrogen Project through both the construction and operations, which include:

- \$11.4 million spent on third-party costs to date;
- \$6 million in direct selling, general, and administrative expenses for development activities to date;
- Approximately \$1.7 billion in capital investment;
- Significant employment opportunities, with the company estimating:

- 1,200 full-time positions through construction;
- 62 full-time positions through operations; and,
- Positive contribution to GDP and tax revenue of the province.

North Atlantic has a deep-rooted working history in the Newfoundland and Labrador, and as noted in the Registration Document, they commit to prioritizing the provision of opportunities for local hires and suppliers, noting that further details with respect to hiring protocols will be included in the Project Benefits Agreement. Energy NL is supportive of this approach to ensuring the local supply and service sector are leading participants and looks forward to the opportunity of its members to participate in the project.

Environmental Preview Report

The Environmental Preview Report (EPR) submitted by North Atlantic in March 2026 adds significant detail to an already comprehensive Environmental Assessment Registration document (July 2025). Energy NL's review of the EPR found detailed answers to the questions posed by the Government of Newfoundland and Labrador which were stated in the EPR Guidelines document, with North Atlantic going as far as to identify information on refinements to the project and the engagement undertaken since the Environmental Registration document, where applicable. The content of the EPR has been presented in a manner that is easy to follow, with a clear question and answer style format, with additional details and clarification provided in the responses and references made to specific sections of the Environmental Registration where relevant. The combination of this EPR with the Environmental Registration ensures that the environmental assessment process for this project has produced thorough results which support project approval.

Supplier Development Sessions

Following the submission of the Environmental Assessment Registration document, but prior to the submission of the EPR, North Atlantic and Energy NL hosted supplier development sessions to begin early engagement of the service and supply sector in the province. Two sessions were hosted in early March 2026, one in Sunnyside and the other in St. John's. Energy NL was extremely pleased to partner with the Arnold's Cove Area Chamber of Commerce to host the session in Sunnyside. The sessions were well attended and provided early information sharing on the project to the service and supply business community, while simultaneously providing additional insights to North Atlantic regarding the local capabilities that are, and will, be available to them through the life of the project. The willingness from North Atlantic to start these conversations early is welcomed by Energy NL and its members, and continuing this engagement is something Energy NL looks forward to pursuing in partnership with North Atlantic as the project progresses.

Conclusion

Energy NL supports the approval of this project based upon the environmental research undertaken, including baseline studies in the project area; the commitments from the proponent to meet environmental standards; and the economic benefits the project will provide Energy NL members and the entire province. This combined wind power and hydrogen project would be an integral part of a new energy industry in Newfoundland and Labrador, providing employment, local supply and service

opportunities, training, technology transfer, and other benefits. This project would also help meet global energy demand.

This project is consistent with resource development objectives of both the provincial and federal governments and will be a conduit to fulfill international agreements and commitments made to produce and export clean hydrogen and derivative fuels. Projects such as the North Atlantic Wind to Hydrogen Project are necessary for Newfoundland and Labrador and Canada to advance their hydrogen economy.

With respect to supply and service opportunities for Newfoundland and Labrador companies, Energy NL believes this project to be a tremendous opportunity for its members, and we encourage the approval of this project and the timely development of the relevant Benefits Plan. Energy NL is willing to work with the provincial government and any proponent regarding the implementation of such a plan, as well as continued engagement of the supply and service sector of the energy industry to ensure full and fair opportunity for them to participate in these renewable energy projects.



Charlene Johnson
CEO
Energy NL