Conservation Council *of* New Brunswick
Conseil de conservation *du* Nouveau-Brunswick

Subject: Comments on the Environmental Impact Assessment for the New Brunswick/Nova Scotia Interprovincial Transmission Line Project

Dear Mr. Gorman,

On behalf of the Conservation Council of New Brunswick (CCNB), we appreciate the opportunity to provide comments on the Environmental Impact Assessment (EIA) for the proposed New Brunswick/Nova Scotia Interprovincial Transmission Line Project. CCNB acknowledges the importance of infrastructure improvements to ensure grid reliability and the transition towards renewable energy. However, we would like to raise concerns and recommendations regarding the project's potential environmental and social impacts.

Environmental Concerns and Mitigation

The EIA documents outline various measures to mitigate the project's environmental impact. However, we encourage additional scrutiny in the following areas:

- **Climate Resilience and Sustainability**: The infrastructure must be designed to withstand future climate-related challenges, including extreme weather events and increasing demands on the grid. Specifically, we urge NB Power to consider constructing the transmission line underground where feasible, as underground infrastructure is significantly more resilient to extreme weather events that are increasing due to climate change. Overhead lines are particularly vulnerable to damage from high winds, ice storms, and wildfires. Underground lines, while requiring higher upfront costs, provide long-term reliability and protection against service disruptions during severe weather. Additionally, we encourage NB Power to adopt climate adaptation strategies and ensure that renewable energy sources are prioritized in future expansions.
- **Biodiversity and Habitat Protection**: The project will traverse ecologically sensitive areas, potentially disrupting habitats of rare and endangered species.

We recommend that NB Power work with conservation organizations and experts to implement habitat preservation strategies beyond the regulatory minimums.

- **Wetland and Watercourse Protection**: Given the potential for watercourse crossings and wetland disturbances, it is critical that best management practices be strictly adhered to, and additional buffer zones considered where feasible.

Community Consultation and Engagement

It is essential that meaningful and robust community engagement occurs throughout all phases of the project. To this end, we strongly recommend that NB Power refer to two critical reports in designing and implementing its community consultation strategy:

1. The **Best Practices Guide for Community Engagement in Energy Projects**, developed by the Conservation Council, provides a framework for fostering successful community engagement in renewable energy initiatives. Recognizing that energy projects often fail due to poor engagement, the guide outlines three core principles for success: meaningfulness, inclusivity, and timeliness (MIT). Meaningful engagement emphasizes transparency, trust-building, and accessibility of information. Inclusive engagement ensures all stakeholders, particularly those most affected, have opportunities to participate in decision-making. Timely engagement involves starting consultations early and maintaining ongoing communication throughout all project phases. The guide also includes checklists and case studies highlighting both successful and failed energy projects to demonstrate best practices. By adhering to these principles, energy companies can enhance community support, mitigate opposition, and ultimately improve project outcomes.
2. The **Why Do Wind Energy Projects Fail?** report by the Conservation Council examines why two wind energy projects in northern New Brunswick failed, despite the province's commitment to renewable energy. The study identifies lack of early and meaningful community engagement, procedural and distributional unfairness, and trust issues as key factors leading to opposition. Developers followed a "decide-announce-defend" approach, failing to consult communities before securing agreements, leading to distrust and resistance. Institutional shortcomings, such as weak government support, lack of standardized community benefits, and inflexible project siting policies, further hindered acceptance. The report recommends early and sustained consultation, institutional support for community engagement, clear benchmarks for benefits, and addressing misinformation to improve future project success.

We urge NB Power to integrate these best practices to ensure that local communities feel heard and are actively involved in shaping decisions that impact their environment and livelihoods.

Indigenous Consultation

The EIA references ongoing engagement with Indigenous communities. We stress the importance of a transparent, consent-driven approach that goes beyond regulatory obligations. Indigenous communities must be engaged as partners, with opportunities for co-management and shared benefits.

Conclusion

Conservation Council of New Brunswick supports responsible energy infrastructure development that aligns with environmental protection and social equity. We believe that by incorporating the recommendations outlined above, NB Power can enhance the project's long-term sustainability and community acceptance. We look forward to continued dialogue on these issues and appreciate your consideration of our comments.

Please do not hesitate to reach out if you require further clarification or would like to discuss these recommendations in more detail.

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