



January 18, 2023

The following submission in response to EverWind Point Tupper Green Hydrogen/Ammonia Project Environmental Assessment is on behalf of the Ecology Action Centre. Due to the short time frame in which the public and civil society groups (including EAC) can comment on projects evaluated through Nova Scotia's environmental assessment process (only 30 days), EAC staff were only able to review and provide comment on a limited number of aspects of the proposed project.

The Ecology Action Centre is an environmental charity based in Mi'kma'ki/Nova Scotia. We take leadership on critical environmental issues from biodiversity protection to climate change to environmental justice. Grounded in over five decades of deep environmental change work and fuelled by love and grief, EAC takes a 50-year perspective on what is needed to build towards a time of thriving and flourishing. We work to equip human and ecological communities for resilience and build a world where ecosystems and communities are restored not just sustained.

Waterbodies, Watercourse and Wetlands

The proponent states that "the raw freshwater pipeline and Transmission Interconnection Line travel within close proximity to its shoreline and/or cross several tributaries of Landrie Lake" **The proponent should clarify what is meant by close proximity, and what impacts, direct and indirect, there will be to the shoreline habitat and ecosystems.**

We are pleased to see that the 11 watercourses within the Project Boundary will not be altered or directly impacted by the construction of the Industrial Facility or the Transmission Interconnection Line. Similarly, we are pleased to see that 40 wetlands located in Transmission Interconnection Line corridor will not be directly impacted or require any alteration. Several indirect impacts to both watercourse and wetlands are highlighted. **The proponent should provide more detail about these indirect impacts including:**

- What are the setbacks that will be observed by Transmission Interconnection Line and raw freshwater pipeline infrastructure and construction materials from the waterbodies, watercourses and wetlands?
- What type of, and how much, vegetation clearing will occur?
- What are the monitoring and mitigation activities described?

Sources of power

This project claims it will meet the UN RED II RFNBO standards, one of which is that green hydrogen and ammonia must be produced through renewable energy sources. The proponent states this will be achieved through a commercial agreement with NS Power “such that the electricity supplied to the Project will be verified/ certified to be originating from renewable energy sources” which could include “wind, tide, run-of-the-river hydraulic, solar, or other acceptable renewable energy sources.” Currently, Nova Scotia includes burning of biomass in its Renewable Electricity Regulations. The EAC, and many others in Nova Scotia, and the European Union, recognize that burning of biomass for electricity is not a renewable or green form of energy. In Nova Scotia, in Canada, [internationally](#), and in [the EU](#) there have been strong cases made to governments for getting biomass for electricity out of renewable energy regulations and out of the energy mix altogether. EverWind Point Tupper Green Hydrogen/ Ammonia Project cannot claim it is green if it is using biomass as an energy source.

Also of note: the need for combustible, fossil fuels for burning of effluent gases in the flare stacks should also be accounted for in the emissions and green certification of this project.

Process for producing ammonia

The proponent has selected the Haber-Bosch process for producing ammonia. Although the EARD describes alternative processes for ammonia production and discusses why the Haber-Bosch process was selected, **the proponent should discuss the risks of the Haber-Bosch process.**

Wildlife

Field surveys were completed in August – October 2022 and did not include any incidental observations of “priority” bird species for the project. **The project should have considered all bird SOCI a priority, as was done for other taxonomic groups (ie., all lichen, plant, and mammals species).** Also, several of the “priority” bird species would not likely to have been observed during the field surveys in August - October. **To complete even adequate field surveys for birds survey dates and times should align with when the species are most likely to be observed (e.g., during spring migration or nesting season, during dawn chorus or at dusk for Common Nighthawk).**

Plans to reduce impact to all SOCI, or even all birds, could be included in the to-be-developed Environmental Management Plan. Currently, consideration of birds does not appear to be a section in the EMP Table of Contents (Appendix D).

