September 2, 2025

Environment and Climate Change
Honorable Dr. Scott Reid, Minister of Environment and Climate Change
Via: EAProjectComments@gov.nl.ca

Re: Toqlukuti'k Avalon Isthmus Green Energy Project (Reg. 2368)

Dear Honorable Minister Reid:

Safari Club International (SCI), on behalf of itself and SCI Canada, appreciates the opportunity to comment on the Toqlukuti'k Wind and Hydrogen Project ("Project"), official registration number 2368. SCI is concerned that the Project threatens the habitat and conservation of vulnerable caribou and moose populations and other wildlife in areas near the Project site. Newfoundland maintains the healthiest caribou population in Canada because of its largely undisturbed habitat, which is crucial to the health of this species. The Project will significantly disturb this habitat. Its large footprint covers management areas and migration corridors for caribou, moose, and many other species. Consequently, it threatens to impair wildlife populations, reduce hunting opportunities, and harm the local economy.

To avoid these negative impacts, SCI respectfully requests further environmental review of the potential impacts to wildlife and habitat, especially caribou and moose. This review should incorporate reconsideration of the Project's siting and size, including industrial facilities, pipelines, and high-voltage transmission facilities. If the Project goes forward as proposed, SCI requests measures be taken to reduce the impact of turbines, pipelines, and transmission facilities to wildlife populations, and to appropriately compensate hunting outfitters who will likely lose access to valuable habitat and whose small businesses are likely to suffer.

Safari Club International

SCI, an I.R.C. § 501(c)(4) nonprofit organization based in Washington, DC, has more than 100,000 members and advocates worldwide. SCI currently has 15 chapters and approximately 8,000 members and advocates who live and hunt in Canada. SCI is in the process of chartering our first chapter in Newfoundland. We also work closely with the guides and outfitters association in the province and with the Canadian Federation of Outfitter Associations. Hundreds of SCI members are professional hunters and guides in Canada, and thousands of SCI members travel to Canada to enjoy its beautiful habitat, abundant wildlife, and unique hunting opportunities.

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SCI's missions include conservation of wildlife, protection of the hunter, and education of the public concerning hunting and its use as a conservation and wildlife management tool. SCI Canada's mission is to advocate in support of Canada's proud hunting heritage and to educate the public on the role of hunting in wildlife management and conservation. SCI Canada engages at the local, provincial, and federal level to represent and advance the interests of hunters and hunting as a conservation tool.

SCI Comments on the Toqlukuti'k Wind and Hydrogen Project Environmental Assessment Registration Document

Concern for impacts to game populations

SCI appreciates the environmental analysis contained in the Environmental Assessment Registration Document (Document) prepared for Toqlukuti'k Wind and Hydrogen Ltd. (TQK). SCI also appreciates statements within that Document averring TQK's commitment to working with affected stakeholders. However, SCI remains concerned that the Document contains little discussion about the Project's potential impact on game populations, especially vulnerable caribou and moose, and fails to address research suggesting negative impacts caused by wind turbines and pipeline development.

According to the Committee on the Status of Endangered Wildlife in Canada's (COSEWIC) Assessment and Status Report for caribou, approximately 14 subpopulations presently inhabit Newfoundland. Caribou are healthier in Newfoundland compared to the rest of Canada. In fact, "anecdotal evidence suggests that a small number of Caribou have begun to reoccupy areas" that they do not currently inhabit on Newfoundland.[1] However, caribou subpopulations in Newfoundland have declined significantly since the 1990s,[2] and caribou populations in other parts of Canada have declined "in a pattern that mirrors the … expansion of human settlement and resource exploitation."[3]

[1] COSEWIC, Assessment and Status Report on the Caribou (*Rangifer tarandus*) Newfoundland Population, Atlantic-Gaspésie Population, and Boreal Population (2014), available at https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/cosewic-assessments-status-reports/caribou-specific-populations-2014/part-2.html (cited as COSEWIC Caribou Assessment).

[2] K.P. Lewis & S.P. Mahoney, Caribou Survival, Fate, and Cause of Mortality in Newfoundland, Sustainable Development and Strategic Science (Feb. 2014), available at https://www.conservationvisions.com/sites/default/files/sdss_technical_bulletin_no_009_caribou_survival_fate_and_cause_of_mortality.pdf.

[3] COSEWIC Caribou Assessment.

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The COSEWIC Assessment describes how caribou avoid areas of human disturbance, such as forestry operations, as well as road traffic. Further, "[n]oise pollution from trucks and other industrial activity may drive Caribou away from areas actively used by humans. Female Caribou establish nursery areas in areas with lower levels of sensory disturbance from development or recreational activities."[4]

The Project will increase human settlement and disturbance, significantly expand road density and use, and create noise pollution that does not currently exist on Newfoundland. The Project includes more than just wind turbines: pipelines, pumping facilities, industrial processing facilities, access roads, and high voltage transmission lines and associated infrastructure will also impact caribou habitat and land use. That footprint threatens to cause a potential decline in caribou abundance or force caribou into concentrated areas, making them more vulnerable to predation or other sources of mortality ("ecological traps").[5]

Moreover, the Document represents that the Project has been sited largely outside caribou range, but that fails to fully consider range expansion, migration, and the impacts of the turbines and other facilities. The Project site is adjacent to the most abundant subpopulation on the island. The Document states that "[t]his limited geographic overlap reduces the likelihood of substantial interaction with the core population range or movement corridors," but it does not include any maps of caribou range, migration corridors, or where the COSEWIC has found that caribou have "begun to use recovery areas." Without that analysis, the Document's statement about "reducing the likelihood of substantial interaction" is wholly unsupported and potentially completely incorrect.

This is particularly true because caribou are a migratory species, and "most sub-populations [on Newfoundland] undertake small seasonal migrations … to calving grounds, and summer and wintering ranges … Seven migratory corridors are consistently used."[6] The Document fails to mention any of these corridors. Yet research previously found that the migration timing and patterns for the Buchans Plateau subpopulation in Newfoundland was disrupted by construction of hydroelectric infrastructure, and it is equally possible that the Project could disrupt migration timing and patterns for the Middle Range herd (whether during construction or operation).[7]

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[4] COSEWIC Caribou Assessment.

[5] COSEWIC Caribou Assessment.

[6] COSEWIC Caribou Assessment.

[7] COSEWIC Caribou Assessment ("Migration patterns can be influenced by anthropogenic disturbance. For example, the timing of migration for the Buchans Plateau sub-population was disrupted by the construction phase of a hydroelectric development but returned to pre-disturbance timing once the construction phase was finished (Mahoney and Schaefer 2002b).").

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Other research has found that caribou change their habitat use due to wind turbines or oil and gas development, and that caribou cows and calves are most negatively affected.[8] This could be catastrophic for Newfoundland's caribou population.

Notably, the COSEWIC Assessment discusses threats to the three primary caribou populations. It describes renewable energy development as a "very high threat."[9] At the time the COSEWIC Assessment was published (2014), renewable energy was not proposed for Newfoundland. But there is no reason to think it would not also threaten caribou in Newfoundland. The Assessment also discusses how caribou show a "general avoidance of a gold mine" in Newfoundland, reinforcing how industrial disturbance in otherwise remote areas negatively impacts caribou behavior.

SCI is also concerned about potential impacts to moose populations. The Document acknowledges that vehicle strikes are already a significant cause of moose mortality. The Project will increase road density and use, exacerbating the risk of harm to moose. Further, the same threat of habitat loss for caribou is even more pronounced for moose, which are known to use the Project area. Research has shown that moose avoid oil and gas development and change how they use habitat, preferring forested areas, when wind turbines are near.[10] Construction of the

[8] *E.g.*, H.E. Johnson et al., Caribou Use of Habitat Near Energy Development in Arctic Alaska, Journal of Wildlife Management (Dec. 2019), available at https://wildlife.onlinelibrary.wiley.com/doi/full/10.1002/jwmg.21809 (finding caribou reduced their habitat use within five km of development during the calving period, within two km during the post-calving period, and within one km during the mosquito harassment period); D. Tsegaye et al., Reindeer Spatial Use Before, During, and After Construction of a Wind Darm, 195 Applied Animal Behaviour Science 103-111 (Oct. 2017), available at www.sciencedirect.com/science/article/abs/pii/S0168159117301764 (finding some reduction in habitat use near wind farm during calving); U.S. Geological Survey Research Abstract, Wind Energy Development Alters Pronghorn Migration at Multiple Scales (Jan. 10, 2023), available at https://www.usgs.gov/publications/wind-energy-development-alters-pronghorn-migration-multiple-scales; E.M. Scholl & U. Nopp-Mayr, Impact of Wind Power on Mammalian and Avian Wildlife Species in Shrub and Woodlands, 256 Biological Conservation (Apr. 2021), available at https://www.sciencedirect.com/science/article/pii/S0006320721000896 (finding many wildlife species including mammals are impacted by construction and operation of wind farms, and more research is needed); M.A. Cronin et al., Mitigation of the Effects of Oil Field Development and Transportation Corridors on Caribou, Final Report to the Alaska Caribou Steering Committee (July 1994), available at https://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/research_pdfs/mitigation_oil_field_development_transportation_corridors_caribou.pdf (finding caribou avoided oil and gas development).

[9] COSEWIC Caribou Assessment ("Wind turbine farms exist within GP range and three more farms are in development, with turbines close enough that most of the intervening forest likely will be removed (Lalonde pers. comm.).").

[10] C. Berndt et al., Moose Behavior in Relation to Operating Wind Turbines in Northern Sweden, 54th North American Moose Conference and Workshop (Dec. 2021), available at

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turbines and other facilities and the turbine operations may negatively impact the moose populations in Management Areas 28 and 44. Further, research has found that operation of wind turbines can potentially reduce moose harvest by changing moose habitat use.[11]

The Document "acknowledges that given the scale of the Project and the wide-ranging interactions that the Project will have with the biophysical and socioeconomic environment, it is anticipated that the [Newfoundland] government may require the proponent for this Project to complete an Environmental Preview Report or Environmental Impact Statement through the [Environmental Assessment] process." SCI urges TQK to complete this Environmental Impact Statement. Given the concerns discussed above, as well as the research showing negative impacts to caribou, moose, and other ungulates from wind turbines and pipelines, TQK must carefully consider the extent and potential mitigation of negative impacts. SCI is also concerned about the high voltage transmission lines and infrastructure and their impacts on wildlife as well, and requests further research on these impacts.

SCI also respectfully requests that TQK reconsider the mitigation planning and incorporate best practices from the United States and Europe. The U.S. Office of Energy Efficiency and Renewable Energy describes best practices to minimize wildlife impacts during site construction as well as during operation.[12] This includes avoiding construction activities and operations during mating and breeding seasons and pausing activities when animals are observed, among other things. It also recommends continued monitoring for the presence of and any impacts to area wildlife. SCI respectfully requests that TQK incorporate all of these, and any recommended practices from countries with substantial wind energy development, like Sweden.

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https://www.researchgate.net/publication/368849437_MOOSE_BEHAVIOUR_IN_RELATION_TO_OPERATING_WIND_TURBINES_IN_NORTHERN_SWEDEN (found that moose with core areas closer to wind turbines (within five km distance) used proportionally more forested habitats than those further away, changing prior habitat-use patterns); D.A. Wattles et al., Response of Moose to a High-Density Road Network, Journal of Wildlife Management 82(5):929–939 (2018), available at https://harvardforest1.fas.harvard.edu/publications/pdfs/Wattles_JWildlifeMgt_2018.pdf (finding road density was a major factor determining how moose moved among habitats).

[11] E. Berg, Wind of Change: Wind Power Establishments Correlate with Changes in Moose Harvests in Central Sweden and Norway (Master's Thesis), Uppsala University (2024), available at https://www.diva-portal.org/smash/get/diva2:1887676/FULLTEXT01.pdf.

[12] Available at https://windexchange.energy.gov/projects/wildlife.

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SCI appreciate TQK's efforts to outreach to affected stakeholders, and its "commit[ment] to ongoing engagement with the [Newfoundland and Labrador Outfitters Association]," as well as the statement in the Document that "TQK will continue to collaborate closely with these stakeholders to help identify and mitigate any potential impacts." But that commitment is not fully reflected in the Document. The Document fails to analyze the potential financial impacts to established outfitting businesses or to the overall outfitting economy in Newfoundland. SCI urges TQK to conduct this analysis and to develop a plan to mitigate harm to the hunting industry and local economy.

As one example of how the Document fails to address impacts to the hunting community and the outfitting industry, SCI notes a reported statement of public concern asking, "What is the impact to recreational users – will I be able to continue to hunt, fish, hike, all-terrain vehicle (ATV), snowmobile?" The Document's response is that "TQK will work with the community to ensure that access to hiking trails is not impacted by the Project." But that response is limited to hiking. What about resident hunters, non-resident hunters, and the outfitting businesses who cater to non-residents? The lack of a full answer underscores how little analysis is directed to the issue of loss of hunting access and wildlife resources, and the consequent economic impact.

In 2017, the hunting and fishing outfitting industry contributed nearly $2.7 billion to Canada's Gross Domestic Product and supported over 37,000 jobs nationwide.[13] In Newfoundland, almost 80% of clients hunt big game, generating important revenue multiplied through spending on lodging, food, souvenirs, sightseeing, and other tourism activities. In 2017, hunting clients spent over $39 million in Newfoundland and Labrador.[14] This is a significant investment in the local economy. The Project risks reducing the competitiveness of Newfoundland to hunting and fishing clients by reducing the unspoiled nature of the experience, as well as the potential harm to wildlife populations discussed above.

Conclusion

Thank you again for the opportunity to comment on the Document. We look forward to reviewing a more in-depth Environmental Impact Statement that fully analyzes the potential

[13] Southwick Associates, The Economic Impacts of Outfitting in Canada (2018), available at https://www.goabc.org/wp-content/uploads/2019/10/CFOA-Final-economic-summary.pdf (cited as Economic Impacts of Outfitting in Canada).

[14] Economic Impacts of Outfitting in Canada. This study also reports that for Newfoundland and Labrador specifically, total economic impacts of the outfitting industry in 2017 was $76,775,000; contribution to GDP was $41,040,000; job creation was 496; labor income was $22,235,000; and tax revenues (federal, provincial, and municipal) were $10,177,000.

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impacts to wildlife populations and habitat, as well as any further analysis of the impact to hunting and economic impact to the outfitting industry. If you have any questions, please contact Regina Lennox, SCI Senior Litigation Counsel, at rlennox@scifirstforhunters.org or Chris Everett, Canada Advocacy Services Specialist, at ceverett@scifirstforhunters.org.

Sincerely,

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