

# Staff Report to Council - for Direction

**Title:** Comments on the Bruce C Nuclear Project Draft Integrated Tailored Impact Statement Guidelines

From: Claire Dodds, Commissioner of Community Development

Date: July 10, 2025

Report Number: CDO-2025-020

#### Staff Recommendation:

That Council endorse the Bruce County Submission to IAAC and CNSC for the Bruce C Nuclear Project Draft Tailored Impact Statement Guidelines (TISG); and

That Council direct staff to submit the County's comments to the Impact Assessment Agency of Canada (IAAC) as part of the public comment period.

## Report Summary:

On June 12, 2025, the Impact Assessment Agency of Canada (IAAC) released several documents, including the draft Tailored Impact Statement Guidelines (TISG), the Public Participation Plan, the Cooperation Plan, the Indigenous Engagement and Partnership Plan, and the Permitting Plan.

The draft TISG outlines the information and studies Bruce Power must address in order to prepare the Impact Statement for the Bruce C Nuclear Project. The Impact Statement will include potential environmental and socio-economic impacts on First Nation and Indigenous communities, and local communities (municipalities), along with plans to mitigate them. This report provides an overview of the project and the federal Impact Assessment (IA) process and includes staff comments on the draft TISG (Attachment 1) for Council's consideration and endorsement prior to submission to IAAC by the July 11, 2025 deadline.

# Background/Analysis:

# Bruce C Nuclear Project and the Impact Assessment Overview

The Bruce C Nuclear Project proposes adding 4,800 MW of new nuclear generating capacity through the construction of four new reactors at the existing Bruce Power site. If approved, the facility would operate for 60 to 100 years. It is the first nuclear project to proceed through Canada's new federal Integrated Impact Assessment (IA) process, led by IAAC in collaboration with the Canadian Nuclear Safety Commission (CNSC).

The IA process requires the proponent to assess environmental effects and socio-economic conditions for First Nations and Indigenous communities, as well as local communities (municipalities) and to propose appropriate mitigation measures. Engagement with all levels

of government, First Nations and Indigenous communities, and the public is a critical at every stage of the process of the IA process. Bruce County calls on IAAC and Bruce Power to directly engage Saugeen Ojibway Nation using their protocols for engagement as rightsholders of the territory in which the Bruce C Nuclear Project is proposed.

As Ontario transitions to cleaner and more reliable energy—outlined in the province's Integrated Energy Plan—the Bruce C Nuclear Project has been identified as a significant energy infrastructure investment needed to meet Ontario's future energy needs. Alongside its opportunities, the project also brings complex and wide-reaching impacts that extend well beyond the immediate project site. Bruce County anticipates population growth, greater demand for infrastructure and services, housing pressures, and other workforce-related challenges. Proactive planning for housing, childcare, emergency response and management, servicing capacity, transit and transportation infrastructure is critical to support community readiness to support the Bruce C Nuclear Project.

Additional information is available on the project website: <u>Bruce C Project | Engage Bruce</u> <u>Power</u> and the IAAC Registry: <u>Bruce C Nuclear Project</u>.

Following the public comment period, ending on July 11, 2025, IAAC will finalize the TISG and related plans, marking the beginning of the multi-year Impact Statement Phase (Phase 2).

# Draft Tailored Impact Statement Guidelines (TISG)

The <u>draft TISG</u> is a technical and comprehensive document that indicates which information and studies Bruce Power must include in their Impact Statement submission. It will outline the scope, methodology, and expectations for how environmental, social, and economic effects of the Bruce C Nuclear Project will be assessed and mitigated. The plain language summary (Attachment 2) is provided to facilitate the review of the comments on the detailed draft TISG.

Bruce County is generally satisfied with the scope and level of detail in the draft TISG. Several positive inclusions align with prior comments—such as the recognition of cumulative effects, the role of municipalities, pressures on infrastructure, and demand for services. Areas for further clarification include municipal responsibilities, mitigation measures related to health and socio-economic impacts, and considerations for vulnerable populations. It is also noted that significant impacts are anticipated to provincial infrastructure and services within the County (e.g. Highway 21, health care, public education) and there is limited recognition of provincial participation in the IA process in the draft TISG. In several sections, it is recommended that either the province participate directly in the IA or work directly with Bruce Power, the County and local municipalities to determine impacts and proposed mitigation measures.

There are significant sections of the draft TISG that establish expectations for studies/work required to be completed Indigenous Nations and communities. It is expected the federal government will engage in a government-to-government process with Saugeen Ojibway Nation to develop engagement and consultation plans to meet their needs as rightsholders of the territory upon which the Bruce C Nuclear Project is proposed. As such, staff have not included specific comments on the Indigenous Engagement Plan or sections of the draft TISG that outlines the requirements to assess and mitigate impacts on First Nation communities.

# Bruce County Comments on the Draft TISG

Staff have prepared comments to submit to IAAC that include a two-tier municipal lens on the draft TISG. IAAC has indicated to County staff that on-going, active participation throughout the Impact Assessment process is critical to ensure that County and local municipal interests are reflected in the final TISG and supporting documents.

The proposed comments emphasize:

- Growth-related pressures on infrastructure and services
- Workforce-related impacts and housing pressures
- Socio-economic and cumulative effects on local communities
- Emergency management and response coordination; and
- Impacts on transportation infrastructure

These comments are informed by earlier feedback submitted during the Initial Project Description stage (September 2024) and reflect both County and local municipal priorities. With Council's endorsement, staff will submit comments to IAAC. Full comments are provided in Attachment 1.

## Draft Public Participation Plan

Bruce County supports the overall direction of the <u>draft Public Participation Plan</u> which includes engagement tools and strategies identified from past engagement. IAAC held two in-person open houses (Saugeen Shores and Kincardine), as well as two virtual engagement sessions with community to create opportunities for input on the draft TISG. Feedback provided by the public through these events will be incorporated into the final TISG.

#### Summary of Potential Incidental Activities

IAAC released a <u>Summary of Potential Federal Incidental Activities</u> on the Registry that provided additional details in activities that may be considered within the IA process. Bruce County's submission expresses interest in being an active participant in any review processes for interim storage of nuclear waste and any transportation of nuclear materials, as well as any impacts from transporting construction materials and equipment if deemed incidental, as they will have significant regional implications. See Attachment 1 for full comments.

#### Next Steps

With Council's endorsement, staff will submit Bruce County's comments to IAAC by the July 11, 2025, deadline.

Staff will provide Council with regular updates as the Impact Assessment for the Bruce C Nuclear Project progresses.

## Financial/Staffing/Legal/IT Considerations:

There is no levy impact related to the preparation of this report and the preparation of the response to the draft TISG. The Bruce C Nuclear Project Coordinator is fully funded by Bruce Power through capacity funding

#### Interdepartmental Consultation:

Consultations have occurred specifically with the Office of the CAO, Corporate Services, Planning and Development, Transportation and Environmental Services, Paramedic Services (Emergency Management) in the development of the comments, and with other subject matter experts across the organization throughout the course of the work associated with the Bruce C Impact Assessment.

#### Link to Strategic Goals and Objectives:

Community and Partnerships - Build a strong and inclusive community

Growth and Innovation - Promote responsible growth

#### Link to Departmental Plan Goals and Objectives, if any:

Advancing work on the Bruce C Nuclear Project algins with Council's priority work for the Community Development Office.

#### **Report Author:**

Christina Tennyson, Project Coordinator

#### Departmental Approval:

Claire Dodds, Commissioner of Community Development

#### Approved for Submission:

Christine MacDonald, Chief Administrative Officer

#### Attachments:

Attachment 1: Bruce County Submission to IAAC and CNSC for the Bruce C Nuclear Project Draft Tailored Impact Statement Guidelines (TISG)

Attachment 2: Plain Language Summary of the Bruce C Nuclear Project Draft Tailored Impact Statement Guidelines (TISG)