

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

## Introduction

Bruce County appreciates the opportunity to provide feedback on the draft Integrated Tailored Impact Statement Guidelines (TISG) and Public Participation Plan, released as part of the Planning Phase of the federal Impact Assessment (IA) for the Bruce C Nuclear Project on June 12, 2025.

The Bruce C Nuclear Project is proposed within a two-tier governance structure with Bruce County being the upper-tier municipality. Bruce County includes eight lower-tier municipalities, commonly referenced as local communities within the draft TISG. Within this structure, the County is responsible for the delivery of a range of services and infrastructure within local communities, including roads and bridges, emergency management and paramedic services, human services including housing and childcare, land use planning, economic development, cultural services (libraries and museum) and long-term care homes.

Bruce County recognizes the Bruce C Nuclear Project is proposed within the territory of Saugeen Ojibway Nation (SON), and SON's consent to this project is required as rightsholders. Bruce County calls on IAAC and Bruce Power to directly engage Saugeen Ojibway Nation using their protocols for consultation and engagement to receive feedback on the draft TISG.

Comments prepared by Bruce County consider the content of the draft TISG to identify, assess, and mitigate anticipated impacts on services and infrastructure delivered by both the County and local municipalities beyond the Bruce Power site. These comments aim to support municipal readiness and community well-being needed to support the Bruce C Nuclear Project. Local municipalities may independently provide comments on the draft TISG.

Any comments on portions of the draft TISG that relate to assessing and mitigating impacts on First Nation and Indigenous communities are most appropriately informed through government-to-government engagement between IAAC and Saugeen Ojibway Nation.

## Why the Bruce C Nuclear Project Matters to Bruce County

Bruce County is home to the Bruce Nuclear Generating Station, operated by Bruce Power, the location of Bruce A and B facilities and the proposed Bruce C Nuclear Project. Bruce Power currently produces 30% of Ontario's energy and is a major employer in the region. The current operation contributes high paying jobs and economic stability within the County.

As Ontario continues its shift toward generation of clean and reliable energy, as outlined in the province's [Integrated Energy Plan](#) (June 2025), the Bruce C Nuclear Project represents a major investment in the province's energy future. The County acknowledges the substantial potential

this investment represents and looks forward to contributing meaningfully to the advancement of Ontario's energy future. The County is generally supportive in principle of the Bruce C Nuclear Project, provided it meets all requirements set out by the IAAC and CNSC in the draft TISG, and adequately addresses all substantive issues identified through the IA process.

Along with this investment, Bruce County expects to experience population growth, increased demand on infrastructure and services, pressure on housing (demand and affordability), childcare services, and workforce-related challenges directly tied to the construction and operation phases of the Bruce C Nuclear Project. Proactive planning for housing, childcare, emergency response, servicing capacity, transit and transportation infrastructure is critical to ensure readiness at both the County and local municipalities.

Recognition of the value of community knowledge is appreciated throughout the draft TISG. Bruce County and the local municipalities will be directly responsible for managing off-site impacts, including community growth, from the Bruce C Nuclear Project. Funding from the proponent in the form of a Community Benefit agreement, as well as provincial and federal government to support community investments in infrastructure and services will be key to assist the County and local municipalities mitigate health, social and economic impacts related to the Bruce C Nuclear Project.

Municipal engagement is essential to the project's overall success. Bruce County and local municipalities intend to be active participants in the Integrated Impact Assessment process and commit to sharing data, knowledge, and local context to inform the preparation of the Impact Statement by Bruce Power.

Bruce County has been actively engaged with Bruce Power throughout the Pre-Planning and Planning Phases to better understand the IA process and Bruce Power's approach to preparing the Impact Statement. Bruce Power has supported the County's engagement by providing capacity funding to hire a project coordinator, which has enabled meaningful participation through regular collaboration and document reviews. The County appreciates the commitment from Bruce Power to provide capacity funding to support our continued engagement in the Impact Assessment process.

### Draft TISG

Based on the County's engagement with Bruce Power, and review of IAAC's TISG template for nuclear projects, it is understood that the draft TISG sets out the framework for Bruce Power's Impact Statement submission. The draft TISG will be finalized following the public comment period. The draft TISG is a detailed and technical document that sets out the scope, methodology, and expectations for the proponent to assess and identify mitigation measures to address environmental, social, and economic effects.

The following sections are of particular importance to Bruce County and local municipalities:

- Workforce Requirements (Section 3.5)

- Methodology, Valued Components and Cumulative Effects (Section 7)
- Health, Social, and Economic Conditions (Section 9)
- Emergency Management (Section 12.3)
- Follow Up Program (Section 16)

To support IAAC's technical review, an Appendix is attached with specific comments that indicate areas of the TISG where further clarification would be helpful.

### Draft Public Participation Plan

Bruce County supports the overall direction of the Public Participation Plan and appreciates the inclusion of tools and strategies informed from past engagement. We hope that further details will be incorporated following IAAC's information and open house sessions on the draft TISG.

For future phases, IAAC is encouraged to explore longer or more flexible public comment periods. The 30-day public comment period is a narrow timeframe for Bruce County to review and prepare comments with meaningful engagement of staff and Council prior to submitting comments in the context of a two-tier municipal governance structure.

### Potential Incidental Activities

Bruce County acknowledges the [Summary of Potential Federal Incidental Activities](#) posted on the Registry and understands these reflect IAAC's preliminary views. We understand Bruce Power will provide further insight to determine if these activities fall within the scope of the IA.

It is understood that the transportation of construction materials to site by boat, rail or other means is being considered as an incidental activity. At present, movement of goods and materials to and from the Bruce Nuclear Generating Station relies heavily on the Bruce County road network. All roads directly accessing the site are either County or local roads. The impact of the transportation of construction materials and equipment for the Bruce C Nuclear Project on County and local roads is critical to consider as part of the Impact Assessment process.

Bruce County intends to be an active participant in any review processes related to interim storage of nuclear waste, fuel and any transportation of nuclear materials. If deemed incidental, these activities will have significant regional implications.

### Summary

Bruce County and local municipalities look forward to continued collaboration with IAAC, the CNSC, and Bruce Power to ensure a comprehensive, inclusive, and locally informed Impact Statement that identifies impacts and mitigation measures that address County and municipal needs to facilitate community readiness for the Bruce C Nuclear Project.

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

Bruce County is generally satisfied with the draft TISG and acknowledge that earlier comments provided on the Initial Project Description (IPD) and Response to the Summary of Issues have largely been incorporated and reflected in the draft TISG.

The comments below reflect areas where further clarification in the final TISG would be beneficial:

### Public Participation and Views (Section 5)

Recognition that municipalities contribute valuable community knowledge, separate from general “public” feedback, supports a meaningful engagement approach throughout the Impact Assessment process. Regular consultation with both the County and local municipalities is important to include in the TISG to ensure community knowledge within a two-tier government structure is incorporated to accurately inform the preparation of the Impact Statement.

The draft TISG requires the application of Gender-Based Analysis Plus (GBA Plus) throughout public participation and the IA. An important population to draw IAAC’s and the proponent’s attention to is the local Mennonite and Amish communities throughout Bruce County who will require special considerations for engagement and inclusion.

### Methodology, Valued Components, and Cumulative Effects (Section 7)

Bruce County understands that additional Valued Components (VCs) may emerge during the process and that the current list represents a minimum. The inclusion of socio-economic elements like housing, childcare, labour, and workforce education is well-aligned with municipal responsibilities. At this time, the County has no further additions to the list of VCs (Section 7.3).

It is noted within the listed VCs, there are several areas of health, social and economic conditions that are listed that fall within the jurisdiction of the provincial government, including health care, public education, and regulatory control of the Highway 21 corridor, including the intersection of Highway 21 and Bruce County Road 20 intersection. While it is recognized the IA and draft TISG is prepared by the federal government (IAAC), which cannot bind participation of the provincial government, Bruce County encourages provincial participation either directly through the Impact Assessment process, or through direct local engagement to support community readiness for the Bruce C Nuclear Project.

The inclusion of known effects from past, present, and anticipated projects and the related historical context is important to assess the full impacts of further nuclear expansion in Bruce County (Section 7.4). Consideration of cumulative effects is important to understand both baseline and anticipated impacts from the project.

The emphasis on the use of Open Science and Data Platform and regional studies is welcomed. Bruce County will provide relevant information and data wherever feasible (Section 7.7).

## Health, Social, and Economic Conditions (Section 9)

Bruce County views this section as foundational to prepare a meaningful Impact Statement.

Baseline data should incorporate existing and perceived service stressors, especially in health care, housing, childcare, and emergency services, as these may amplify during construction and operation phases. Clarity on how IAAC intends the proponent will engage municipalities to gather accurate data to establish baseline assessments and establish geographic and temporal boundaries would be beneficial.

Direction to incorporate municipal input into the Impact Statement would help define the municipal role in this process. Section 9.1.3. outlines the mitigation and enhancement measures for Health, Social, and Economic Conditions. Unlike in Section 8, where mitigation and enhancement measures are identified and outlined in each sub-section, 9.1.3 is the only area where these measures are noted. For clarity and tracking, mitigation measures or enhancements need to be clearly listed under the relevant subsections in Section 9.

Clarification is requested on the process for selecting mitigation measures. Section 9 references “The IAA also requires the assessment of adverse effects within federal jurisdiction...,” however it identifies impacted services that would fall within provincial jurisdiction. Bruce County stresses the importance of provincial participation in the IA process to ensure any health, social and economic impacts are fully mitigated. Provincial capacity funding is essential for the County and local municipalities to support community growth readiness, including any required upgrades to infrastructure (roads, bridges, sewer, water, parks, landfills, etc.) and services (housing, emergency management, emergency services, long-term care, libraries, museums, recreation facilities, community safety and well-being, childcare, social services, transit, economic development, land use planning, etc.).

## Social Determinants of Health (Section 9.3)

Bruce County supports the recognition of municipal capacity constraints and the reference to capacity funding. Local governments are already managing strain on existing services, including demand for childcare spaces, oversubscribed recreation programs, aging infrastructure and growing need for affordable housing and social service supports. For the County and local municipalities, the provision of infrastructure and services are largely funded by local residents through property taxes. Delivery of additional services and infrastructure would put additional cost on local property owners within the County. Any increase in property taxes impacts the affordability of housing, commercial and industrial properties.

To support community readiness, it is important that capacity funding is not just described in the Impact Statement but facilitated by the proponent and the provincial and federal levels of

government, based on mandate and jurisdiction, to off-set impacts to the local property tax base.

Land use planning, a crucial social determinant of health, is delivered jointly by Bruce County and local municipalities. Both levels of government need be engaged in collecting data to support baseline assessments. Additional clarity recognizing the two-tier government structure within which the Bruce C Nuclear Project is important to ensure the impacts to both levels of government are considered in the final Impact Statement.

Within the effects, understanding in-and out-migration effects (transient populations) and longer-term population shifts, will inform better community growth readiness. Consideration for the provision of transient workforce housing should be included in the draft TISG. If applicable, specific mitigation measures that prevent displacement or minimize the strain on service delivery for vulnerable populations (e.g., seniors, low-income families, newcomers, emergency housing, etc.) would be of value. Bruce County's Human Services and Employment Services would welcome opportunities to collaborate with the proponent to address affordability and access challenges for housing, workforce, training, etc.

Bruce County is the Service System Manager for housing and homelessness services, childcare and early years, and employment services. The County also co-funds the administration and delivery of social assistance (Ontario Works) and support services programs on behalf of the province. Bruce County holds a regional role in coordinating the delivery of services through the Community Safety and Well-being Plan for municipalities in Bruce and Grey Counties. In these capacities, Bruce County collects data related to these services. Where feasible, Bruce County can share aggregated data to illustrate community knowledge and experience during the development of the Impact Statement.

#### Services and Infrastructure (Section 9.4)

Bruce County appreciates IAAC's acknowledgment of off-site service and infrastructure impacts. Inclusion of project-related needs for new or expanded services, facilities, or infrastructure, including the potential for government or proponent funding is supported.

Understanding the cumulative and growth-related effects will help the County and local communities proactively plan, which is essential for managing growth-related pressures and quantifying the need for infrastructure funding.

#### Employment and Economics (Section 9.5)

Bruce County views the Bruce C Nuclear Project as significant economic opportunity for local communities, and one that has the potential to be proactive to address concerns or impacts about the effect on local businesses, labour availability, and the affordability of living and doing business in Bruce County.

Specific mitigation measures to help ensure community stability are needed to balance local hiring goals with risks of displacement and rising inequality while still recognizing that positive economic and social outcomes (e.g., youth retention, job creation) may be unevenly distributed throughout the project lifecycle.

The workforce requirements and study are critical to forecast population growth more broadly – and will represent foundational information to consider service delivery and infrastructure impacts and land use planning for Bruce County, local municipalities and delivery of provincial services such as health care and education. Direct recognition in the TISG that workforce size and characteristics will directly affect local community needs for services and infrastructure would strengthen the TISG.

### Emergency Management (Section 12.3)

Consideration of emergency management related to the Bruce C Nuclear Project is critically important for community safety. Bruce County and several local municipalities have emergency management programs that intersect with emergency management plans that will be developed for the Bruce C Nuclear Project and the Bruce Power site.

Engagement with the Province on emergency management related to the Bruce C Nuclear Project is key. In addition to the proponent's obligations to engage the County and local municipalities to provide off-site emergency response to meet emergency management requirements for CNSC licensing, the County and local municipalities also have specific responsibilities under both the Provincial Nuclear Emergency Response Plan and the Emergency Management and Civil Protection Act.

It is recommended the draft TISG be updated to include the requirement for the proponent to coordinate and engage the County and local municipalities through their emergency management programs, including emergency response, including police, fire, paramedic services, and mutual aid agreements. Consideration for the financial impact of staff time to participate in major training exercises should be considered in any agreements for off-site emergency response support, or through a Community Benefit Agreement.

Weather-related emergencies are amongst the most common hazard to impact the operation of the Bruce Nuclear Generating Station. Bruce County can be subject to severe weather conditions, especially through the winter due to snow accumulation and winter storm events. Winter weather conditions can often cause closures of Provincial Highway 21, which is the primary transportation route for workforce traveling to the station. During highway closures, there is a reliance on the County and local municipalities to maintain operations to ensure alternate roads provide access to site. The additional cost, maintenance and deterioration of County and local roads is significant, especially when regular and prolonged closures of provincial Highway 21 occur. It is recommended that the province either be engaged through the Impact Assessment process or directly with the County and impacted municipalities to

address both off-site emergency management, and transportation infrastructure needed to support community readiness for the Bruce C Nuclear Project.

Bruce County recommends all emergency preparedness assessments for the Bruce C Nuclear Project include consideration for a transient workforce, seasonal population fluctuations, and demographic changes. These should reflect maximum service load scenarios, not just baseline projections, to ensure realistic and effective planning recognizing the complexity in emergency response planning.

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