

June 25, 2025

Bruce C Nuclear Project
Impact Assessment Agency of Canada
160 Elgin Street, 22nd Floor
Ottawa, Ontario K1A 0H3

RE: Municipality of Kincardine comments on the Bruce C draft Permitting Plan

To Whom it May Concern:

Please accept this submission from the Municipality of Kincardine on the draft Permitting Plan for the Bruce C Nuclear Project. These comments have been endorsed by the Council for the Corporation of the Municipality of Kincardine at the July 9, 2025 meeting.

We request that these comments be reflected in the final Permitting Plan and if they are not included, we request a written response with the detailed rationale.

The Municipality of Kincardine is the host community to the Bruce Nuclear Generating Station, the Ontario Power Generation (OPG) Western Waste Management Facility and the Douglas Point Nuclear Generating Station. The Municipality, including the former Township of Bruce, has been host to the nuclear industry for almost 60 years.

Over this time, the municipality or the former Township of Bruce, has entered into various agreements, host agreements and Memorandums of Understanding with the industry to deal with a broad range of issues, services, and permitting requirements on the [Bruce Nuclear Site](#). A copy of the two (2) former host agreements are attached for the Impact Assessment Agency of Canada (IAAC) and the Canadian Nuclear Safety Commission (CNSC) awareness:

- Township of Bruce and Ontario Hydro Host Agreement
- Municipality of Kincardine and Ontario Power Generation Host Community Agreement

Currently, the Municipality of Kincardine does not have a host agreement for the Bruce Nuclear Generating Station, the OPG Western Waste Management Facility or the decommissioning project for the Douglas Point Nuclear Generating Station.

The [Overview of the Impact Assessment Permitting Plan - Canada.ca](#) website, indicates that the permitting plan will include the following types of permits, licenses and authorizations that may be required for a designated project:

The Municipality of Kincardine

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- federal permits, licences and authorizations, including those under the authority of lifecycle regulators (the Canadian Energy Regulator, the Canadian Nuclear Safety Commission, the Canada–Newfoundland and Labrador Offshore Petroleum Board and the Canada–Nova Scotia Offshore Petroleum Board);
- permits, licences and authorizations of any jurisdiction (provincial/territorial or Indigenous) that will — or is planning to — undertake a joint review panel impact assessment process with the Agency under the Act;
- permits, licences and authorizations of another jurisdiction that may have responsibilities for the assessment of a project may be included in the permitting plan with the agreement of the Agency and that jurisdiction; and
- any other permits, licences and authorizations that the Agency determines are appropriate to include.

The Municipality of Kincardine is seeking clarification from the Canadian Nuclear Safety Committee (CNSC) and the Impact Assessment Agency of Canada (IAAC) regarding permitting and regulatory authorizations for fire protection and building permitting within the Project Study Area. Specifically, would all future buildings within the Project Study Area identified in the IPD Proposed Site Layout Scenarios as ‘potential Bruce C supporting infrastructure’ be subject to the CNSC permitting and licensing requirements and will the CNSC be the Authority Having Jurisdiction over fire protection and building permitting for all new facilities?

Should the CNSC not be the Authority Having Jurisdiction for fire protection and building permits for the entirety of the Project Study Area, the Municipality would request that the permitting plan be updated to clearly define the permits and licenses that may be required and the appropriate jurisdiction responsible for these permits and licenses on the site.

Request: The Permitting Plan be updated to include the areas of the Project Study Area that are subject to the Nuclear Safety and Control Act and if there are areas or proposed facilities that are not subject to the NSCA, that these be outlined accordingly and the appropriate jurisdiction be included in the permitting plan.

As is noted above, the Municipality historically issued building permits on the Bruce Nuclear Site. Should the Municipality be identified in the future as the Authority Having Jurisdiction for fire protection and building permitting for non-licensed CNSC facilities on the Bruce Nuclear Site, the Municipality would need to ensure that this is assessed accordingly through the IA process.