

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 draft Public Participation Plan

To Whom it May Concern:

Please accept this submission from the Municipality of Kincardine on the [draft Public Participation Plan](#) for the Bruce C Nuclear Project. This submission was endorsed by the Council for the Corporation of the Municipality of Kincardine at the July 9, 2025 meeting.

The Municipality of Kincardine is the host municipality to Bruce Power, Ontario Power Generations' 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.

Our Mayor and Council are elected every 4 years by the residents in our community, and as such, the Municipality is a local government that represents the local public. As the host municipality to Bruce Power, our local government leaders and officials are also key community knowledge holders on areas of social, health, economic and environmental items.

There are a few key areas of the Public Participation Plan that we wish to raise concerns and suggestions:

1. Section 4 Identification of Participants lacks details on which groups and organizations IAAC and the CNSC are engaging with for this project. In reviewing other Public Participation Plans (such as [the Upper Beaver Gold Project Public Participation Plan](#)), including a list of specific groups and organizations and their province of origin. In the example noted above, it states that "This list was informed by participants in the Planning Phase for the Project; participants identified in documents provided by the proponent; and participants identified by the Agency in proximity to the Project with potential interest or technical knowledge relevant to the impact assessment." The Municipality would be happy to work with IAAC and CNSC in developing this of potential participants.

The Municipality of Kincardine

1475 Concession 5, R.R. #5, Kincardine, ON N2Z 2X6

Phone: 519-396-3468 | Fax: 519-396-8288

kincardine.ca

Request: That IAAC and the CNSC compile a list of public entities and organizations that includes communities and associations who may have an interest in the projects impact assessment within Section 4 of the Public Participation Plan.

2. There is a lack of recognition or acknowledgement in sharing information and engaging with persons living in the vicinity of the site. [CNSC REGDOC 3.2.1 Public Information and Disclosure](#) states:

The requirements for public information programs and disclosure protocols are derived from the stated objectives of the Commission in the Nuclear Safety and Control Act (NSCA). The relevant provisions are as follows:

paragraph 3(j) of the Class I Nuclear Facilities Regulations: "...the proposed program to inform persons living in the vicinity of the site of the general nature and characteristics of the anticipated effects on the environment and the health and safety of persons that may result from the activity to be licensed."

Request: Please include details on how IAAC and the CNSC are engaging and sharing information with persons living in the vicinity of the Bruce Power site.

3. Under Section 3, Objectives of Public Participation, it notes that public participation must be meaningful and that the public is provided with "the capacity and resources to participate in an informed manner".

The Municipality of Kincardine applied for funding through the Impact Assessment Agency of Canada (IAAC) and this funding request was denied, as it was indicated that Municipalities are not eligible for IAAC funding programs. The Municipality of Kincardine does not have adequate capacity and resources to meaningfully participate in the IA process for the Bruce C project. With our community knowledge and decades of experience as a nuclear host community, it makes it extremely challenging to participate meaningfully in the process and identify potential impacts on municipal services and infrastructure, which are vital to the overall success of the project.

The Municipality does acknowledge and thank Bruce Power for supporting 1 staff position at the municipality to review documents, provide comments on behalf of the municipality and participate in weekly Bruce C teams. This resource is helpful but is not likely able to fully assess the various studies and vast array of potential impacts that will be required as part of the Impact Statement phase.

Through the Canadian Association of Nuclear Host Communities (CANHC), \$5,000 in funding was received from IAAC to hire GHD consulting to complete the [Federal Integrated Assessment Roadmap](#), which provides a guide for municipalities that are considering new nuclear projects, as well as studies and assessments for consideration

by the host community in helping to identify potential impacts. Appendix A of this document outlines areas of interest and impact that the municipality would like to lead or peer-review as part of the IA process for the Bruce C project.

Request: IAAC include local governments as eligible entities in the Public Participation Funding program, make a separate funding program specifically for local governments and host communities, or recommend that the proponent for major infrastructure projects be required to develop capacity funding agreements with the host community.

4. The short time period provided for public commenting period on the draft Integrated Guidelines makes it very challenging for the municipality and the public to review and provide comments. Due to the scale and significance of this project, we do recommend providing additional time for public commenting periods outlined the Table of public participation approaches and activities (Table 1).

Request: IAAC and CNSC provide additional time for public commenting period on future documents.

5. As the host Municipality to the proposed Project, we strongly recommend that IAAC and CNSC attend community event(s) occurring in the Municipality of Kincardine. A link of community events is available at [Events | Kincardine Welcomes](#) and our staff would be pleased to provide suggestions on events that may be most valuable to attend.

Request: IAAC and CNSC attend at least 1 community event in the host municipality during each phase of the project.

We look forward to continuing to work with IAAC, the CNSC and Bruce Power on engaging with our residents and businesses on this important project to ensure appropriate public participation. Should you have any questions on the above information, please don't hesitate to contact us.