Comment Form – Draft Permitting Plan and draft Integrated Tailored Impact Statement Guidelines – Federal Review Team

Bruce C Nuclear Project **Response required by: July 11, 2025**

All comments should be submitted via the Submit a Comment feature available on the Project's Canadian Impact Assessment Registry[1] (the Registry). Documents can be uploaded using this feature. If you have any difficulties submitting this way, please contact the Registry team directly at registry-registre@iaac-aeic.gc.ca. All comments submitted using this form will be posted on the Registry website for the Project.

Please note that this is your opportunity to customize the draft Integrated Tailored Impact Statement Guidelines.

Department/Agency:	Department of Fisheries and Oceans		
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Section 1 – Draft Permitting Plan:

1. Confirm that all applicable legislative and regulatory oversight that may apply to the Project, under the authority of your department or agency, is accurately listed in the draft Permitting Plan.

Insert response here:

Yes, the applicable legislative and regulatory requirements are listed for DFO.

2. Indicate whether your department or agency has identified any power that it will be unable to exercise to allow the Project to proceed, in whole or in part. For more information, please refer to subsection 17(1) of the IAA.

Insert response here:

[1] https://iaac-aeic.gc.ca/050/evaluations/proj/88771

Section 2 – Draft Integrated Tailored Impact Statement Guidelines:

1. Please review the draft Integrated Tailored Impact Statement Guidelines (the Integrated Guidelines) sections that are applicable to your department's or agency's mandate.
2. Using the table below, given the context of the Project, please provide any comments and include your recommendation for how the final Integrated Guidelines should be adapted to address your comments.
    - Please indicate any corrections, additions or deletions that should be made to the text including considerations of submissions from Indigenous Nations and communities that are relevant to your departmental expertise. Please provide a clear context and rationale for your recommendations, including how their implementation would help focus the assessment on, and resolve, key issues relevant to federal decision-making.
    - Federal expert advice should be solution oriented and commensurate to the context of the Project. Advice should be informed by risk-based prudence and evidence in the proponent's Initial Project Description,[2] Response to the Summary of Issues[3], and publicly available information, with a strong reliance on well-understood mitigation measures, existing guidance, and regulatory instruments that will manage effects. Advice should also be informed by a clear understanding of the project, the local biophysical and socio-economic context.
3. Strategic Questions to Inform Advice
    - What knowledge/information does your department have in relation to the key issue? Does your department have any ongoing or upcoming relevant studies/initiatives? What information/action might support mitigating/resolving issues?
    - Do we have a good understanding of the pathways of effects? Which key VCs or pathways of effects are missing? Do we have common ground on what the key issues are?
    - What federal and provincial tools can be leveraged to resolve issues and avoid duplicating efforts? How can we use existing regulatory frameworks to build confidence in predictions and outcomes?

[2] https://iaac-aeic.gc.ca/050/evaluations/document/158463
[3] https://iaac-aeic.gc.ca/050/evaluations/document/160157

Department – Comment ID (e.g., ECCC-01)	Draft Integrated Guidelines Section (and subsection, if available)	Context and Rationale (provide an explanation of your comments)	Recommendation: provide text to be inserted or deleted. Be specific on the location within the draft Integrated Guidelines that the text would be added/deleted.
DFO-01	8.11.2	Similar to the thermal effects the effects from the intake and outfall should also be described.	Insert: Describe the effects from the water intake and outfall associated with nuclear power generating activities: ○ effects on fish and fish habitat, including: ▪ physical displacement of life stages exposed to intake and outfall; ▪ loss of fish habitat from the intake and outfall structures ▪ behavioural responses (attraction and avoidance) for all life stages; and ▪ direct effects (survival, growth, reproduction, diet, condition) and indirect analysis and evaluation of the incremental effects from the Project, and the cumulative effects of combined intakes and outfall

DFO-02	8.11.2	Additional guidance documents that might be helpful for the proponent	Additional guidance that should be referenced to support the effects assessment and associated follow up include: • Estimating impacts and offsets for the death of fish • The Management of Death of Fish (other than fishing), under the Fisheries Act and the Species at Risk Act • A review of functional monitoring methods to assess mitigation, restoration, and offsetting activities in Canada / Douglas C. Braun, Karen E. Smokorowski, Michael J. Bradford, Luc Glover.: Fs70-5/2019-057E-PDF - Government of Canada Publications - Canada.ca • A framework for ecological risk assessment at contaminated sites in Canada: review and recommendations; • Criteria contained in Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters. • Environment and Climate Change Canada's total suspended solids and turbidity criteria. • DFO Projects Near Water website: Measures to protect fish and fish habitat

DFO-03	8.11.2	Entrainment is also expected to be 100% mortality	• for effects to fish and other aquatic biota from impingement and entrainment, the estimates of intake losses (cropping rates) for all life stages of aquatic biota in numbers and biomass should be extrapolated to the whole year, with confidence intervals based upon industry-accepted methods of sampling and analysis. This extrapolation includes the conversion of immature stages to age-1 adult equivalents for estimates of losses of population-level importance. Standard modelling and statistical approaches and contextual methods from government agencies and peer-reviewed published scientific literature should be used to project the effects on individual biota to those of the year-class or population. Mortality is assumed to be 100 percent from entrainment, and from impingement unless a fish handling and return system is included. The effectiveness predictions also vary by species and life stage. For example, alewife are fragile and easily killed, whereas sucker and eels are not; juveniles are easily injured and do not easily withstand mechanical handling systems (REGDOC-1.1.1 Appendix G.5.3).

DFO-04	8.11.3	While the initial construction of the proposed facility has the potential to adversely impact fish and fish habitat, the majority of the negative impacts to fish will occur during the operation of the facility. The proponent should ensure that the chosen design incorporates the best available technology for avoiding harmful impacts to fish and fish habitat and implements the best available mitigation measures and standards for impingement and entrainment of fish during the operation of the facility.	• "measures to prevent or mitigate the risk of harmful alteration, disruption or destruction of fish habitat, or death of fish caused by any project activity including operation, including during the sensitive periods and in the sensitive locations (e.g. spawning and migration) for fish and other aquatic species;" • "measures recommended to avoid and mitigate fish mortality, for example, during use of explosives or from thermal plumes in the aquatic environment, or by fish impingement and entrainment during pumping and water withdrawal operations (e.g. during the construction of temporary structures and of hydrostatic tests, as well as the operation of the facility)" • measures and plans to offset or compensate for any loss ~~in productivity~~ of fish ~~populations~~ and fish habitat as a result of the Project

Insert as many rows as applicable