

Comment Form – Draft Cooperation Plan and Draft Integrated Tailored Impact Statement Guidelines – Provincial 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 page (<https://iaac-aeic.gc.ca/050/evaluations/proj/88771?culture=en-CA>). Documents can be uploaded using this feature. If you have any difficulties submitting this way, please contact the Registry 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 tailor the draft Tailored Impact Statement Guidelines.

Ministry/Office:	Ministry of Citizenship and Multiculturalism (MCM)		
IA Contact:	Anastasia Abrazhevich, Heritage Planner, Heritage Planning Unit	Telephone:	437-240-2379 (Anastasia) 416-660-1027 (Karla)
	Karla Barboza, Team Lead, Heritage Planning Unit	Email:	anastasia.abrazhevich@ontario.ca karla.barboza@ontario.ca

Section 1 – Draft Cooperation Plan:

1. Indicate whether your Ministry or office has identified any legislative and regulatory oversight that may apply to the Project and/or incidental activities related to the Project, under the authority of your Ministry or office.

Insert response here:

The Ministry of Citizenship and Multiculturalism (MCM) will review any technical cultural heritage studies related to this Project to ensure compliance with the *Ontario Heritage Act* (OHA).

Under its mandate to conserve Ontario’s cultural heritage, MCM applies the following processes and approvals to address potential adverse effects on cultural heritage resources, including archaeological resources, built heritage resources and cultural heritage landscapes. Archaeological resources include artifacts, archaeological sites, and marine archaeological sites, as defined under the OHA.

Ontario Heritage Act, Part III.1
The [Standards and Guidelines for Conservation of Provincial Heritage Properties](#) (PHP S&Gs), prepared under section 25.2 of the OHA, came into effect on July 1, 2010. All Ontario government ministries and public bodies prescribed under Ontario Regulation 157/10, including Ontario Power Generation, must comply with the PHP S&Gs. They apply to property that is owned or controlled by the Crown in right or by a prescribed public body. OPG has confirmed that this Project is owned by them.

Ontario Heritage Act, Part VI
Under the OHA, MCM regulates archaeology and licenses archaeologists. The ministry reviews archaeological reports as a condition of licensing in accordance with Part VI of the OHA. This review is to ensure that

archaeologist has met the terms and conditions of their licence, that the archaeological sites have been identified and documented according to the standards set by MCM and that the archaeological fieldwork and report recommendations ensure the conservation of archaeological resources.

Once they have reviewed an archaeological report, MCM staff provide the archaeologist with a letter. If the report complies with the [Standards and Guidelines for Consultant Archaeologists](#) (MCM, 2011), the letter informs the archaeologist that the report has been entered into the Ontario Public Register of Archaeological Reports. The letter is copied to the proponent (e.g., ministry or prescribed public body) and the approval authority (e.g., Ministry of the Environment, Conservation and Parks, Impact Assessment Agency of Canada). Approval authorities often rely on the letter to address legislative requirements.

2. In the table below, please provide all applicable provincial EA requirements, permitting and/or approval requirements that may apply to the Project and/or incidental activities related to the Project, under the authority of your Ministry or office.

Provincial Ministry or Office (e.g., Ministry of Environment, Conservation and Parks)	Regulatory Mechanism (Identify applicable provincial EA, permitting or approval requirements)	Reference (Provide link with additional information on provincial regulatory mechanism identified)
Ministry of Citizenship and Multiculturalism (MCM)	Ontario Heritage Act, section 25.2 - Standards and Guidelines for Conservation of Provincial Heritage Properties (PHP S&Gs) as the project may impact lands owned or controlled by the Crown in Right of Ontario or by a public body prescribed under O.Reg. 157/10, including Ontario Power Generation.	Ontario Heritage Act, R.S.O. 1990, c. O.18 ontario.ca Standards and Guidelines for Conservation of Provincial Heritage Properties ontario.ca
Ministry of Citizenship and Multiculturalism (MCM)	Ontario Heritage Act, Part VI – Conservation of Resources of Archaeological Value The Project may impact on (terrestrial and marine) archaeological resources. Archaeological assessments will be required to support this Project.	Ontario Heritage Act, R.S.O. 1990, c. O.18 ontario.ca Standards and Guidelines for Consultant Archaeologists ontario.ca

Insert as many rows as applicable

3. Using the table below, please provide areas of expertise related to the Project and appropriate contact information for the final Cooperation Plan and further cooperation on the integrated assessment of the Project.

Provincial Ministry or Office (e.g., Ministry of Environment, Conservation and Parks)	Areas of Expertise (Provide a list of areas of expertise that your ministry/office holds)	Contact Information (Department name, address, telephone number, contact email address)
Ministry of Citizenship and Multiculturalism (MCM)	Review of technical cultural heritage studies (e.g., archaeological assessments, cultural heritage evaluations, heritage impact assessments).	Heritage Planning Unit Heritage Operations Branch Citizenship, Inclusion, and Heritage Division 5 th Floor, 400 University Avenue Toronto, ON M56 157 heritage@ontario.ca See above contact information

Section 2 – Draft Tailored Impact Statement Guidelines:

If any legislative and regulatory oversight that may apply to the Project and/or incidental activities related to the Project, under the authority of your Ministry or office, was identified in Section 1:

1. Please review the draft Tailored Impact Statement Guidelines (the Guidelines) sections that are applicable to your Ministry’s or office’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 Tailored Impact Statement Guidelines should be adapted to address information requirements of your Ministry’s or office’s regulatory mechanisms in order to reduce duplicative provincial and federal requirements.
 - 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 Ministry’s or office’s expertise. Please provide a clear context and rationale for your recommendations, including how their implementation would help focus the assessment on key issues relevant to federal decision-making.
 - Provincial 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 Description¹ Response to the Summary of Issues², and publicly available information, with a strong reliance on well-understood mitigation measures, existing guidance, and regulatory instruments that will manage effects.

Ministry – Comment ID (e.g., MECP-01)	Draft Guidelines Section	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 Guidelines that the text would be added/deleted.
MCM-01	3.2 (Project Location) p. 16	It is not clear what the last bullet ‘culturally important features of the landscape’ means. The language should be consistent with either the Technical Guidance for Assessing Physical and Cultural Heritage or any	Please replace the last bullet with the following: <ul style="list-style-type: none"> • physical and cultural heritage, that includes any structure, site, or thing that is of historical, archaeological, paleontological, or architectural significance) (aka, under Ontario’s

¹ <https://iaac-aeic.gc.ca/050/evaluations/document/158463>

² <https://iaac-aeic.gc.ca/050/evaluations/document/160157>

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		<p><u><i>Structure, Site or Thing that is of Historical, Archaeological, Paleontological or Architectural Significance under the Canadian Environmental Assessment Act, 2012 or the Standards and Guidelines for Conservation of Provincial Heritage Properties (OHA, 2010).</i></u></p>	<p>framework, known or potential cultural heritage resources, including archaeological resources, built heritage resources and cultural heritage landscapes).</p>
MCM-02	<p>7.3 Selection of Valued Components (Table 2- Valued Components to include in the Impact Statement)- Indigenous physical and cultural heritage and structures, sites, or things of significance.</p> <p>p. 45</p>	<p>The Project may impact cultural heritage resources of significance to Indigenous and non-Indigenous peoples. Different types of heritage, structures, sites, or things can fall under the authorities of municipal, provincial/ territorial, or federal governments and sometimes under several of these authorities. Although the effects within federal jurisdiction are related to Indigenous peoples, baseline conditions should also include non-indigenous communities and Ontario’s regulatory framework that may identify areas of cultural heritage value (significance) within the Project’s location.</p> <p>This section should be revised to align with the <u><i>Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing that is of Historical, Archaeological, Paleontological or Architectural Significance under the Canadian Environmental Assessment Act, 2012 as well as the requirements under the Ontario Heritage Act.</i></u></p> <p>Technical cultural heritage studies (e.g. cultural heritage reports, archaeological assessments) undertaken for the federal EA process should also be used to</p>	<p>MCM recommends that a separate section be included to address Physical and Cultural Heritage affiliated with Indigenous and non-Indigenous peoples, either under Social Conditions (section 7.3) or in a separate section on Physical and Cultural Heritage.</p> <p>MCM recommends the following revisions:</p> <p>Valued component:</p> <p>Physical and cultural heritage</p> <p>a. Indigenous physical and cultural heritage, and structures, sites, or things of significance, including:</p> <ul style="list-style-type: none"> - sacred sites and culturally significant locations (SOI Issue 15I); and - stewardship responsibilities (SOI Issue 15w) <p>b. known and potential cultural heritage resources (Ontario Heritage Act, Part III.1)</p> <p>Rationale for inclusion:</p> <ul style="list-style-type: none"> - Changes to the terrestrial and aquatic environment (i.e. the landscape) may adversely affect archaeologically significant ancestral landscape in Saugeen Ojibway Nation territory (SOI Issue 8d). - Changes to the environment may adversely affect known and potential cultural heritage resources on a property owned or controlled by the Ontario Power Generation (OHA, Part III.1) <p>MCM recommends, as a first step, that the proponent completes the following screening</p>

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		support any requirements under the OHA.	<p>checklists to determine whether technical cultural heritage studies will be required:</p> <ul style="list-style-type: none"> - Criteria for Evaluating Archaeological Potential - Criteria for Evaluating Marine Archaeological Potential (if shoreline or in-water works are proposed) - Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes <p>It seems that the Project would impact on known or potential cultural heritage resources, therefore, the following technical cultural heritage studies would be required:</p> <ul style="list-style-type: none"> - At a minimum, a Stage 1 archaeological assessment (AA) but we recommend, as a best practice, that a combined Stage 1-2 AA be carried out. - A marine archaeological assessment - A Cultural Heritage Evaluation Report.
MCM-03	10.1 Indigenous physical and cultural heritage, and structures, sites, or things of significance p. 125	See comments above. Although the draft TGIS is focussed on matters under federal jurisdiction, it seems that this Project may also impact land that are owned or controlled by a prescribed public body (i.e., OPG) and therefore, the Standards and Guidelines for Conservation of Provincial Heritage Properties (Ontario Heritage Act, s. 25.2) may apply. MCM also regulates archaeology and licenses archaeologist and will be reviewing any archaeological assessments (terrestrial and marine).	This section should be expanded to include the other requirements that Proponent might have.
MCM-04	10.1.2 (Effects to Indigenous physical and cultural heritage) p. 125-126	<p>The Project may impact cultural heritage of significance for non-Indigenous peoples.</p> <p>Different types of heritage, structure, site, or thing can fall under the authorities of</p>	<p>MCM recommends the following edits:</p> <p>The Impact Statement must:</p> <ul style="list-style-type: none"> ○ <u>Include a description of the nature and current condition of the heritage of any structure, site or</u>

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		<p>municipal, provincial/territorial, or federal governments and sometimes under several of these authorities. Effects of any changes to the environment on heritage or any structure, site, or thing (other than those with respect to Indigenous peoples) that are directly linked or necessarily incidental to a federal decision shall be assessed. Therefore, the Impact Statement will assess effects of changes to all cultural heritage resources, associated with Indigenous and non-Indigenous communities. The Tailored Impact Statement Guidelines should be consistent with the Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing that is of Historical, Archaeological, Paleontological or Architectural Significance under the Canadian Environmental Assessment Act, 2012.</p>	<p><u>thing (known and potential cultural heritage resources);</u></p> <ul style="list-style-type: none"> ○ assess potential effects to physical and cultural heritage, and structures, sites, or things of historical, archaeological, paleontological, or architectural significance to NationsIndigenous and non-Indigenous communities; including, but not limited to: (...) ○ <u>consider the potential cumulative effects;</u> ○ (...) describe the outcomes of engagement and consultation activities with the public and Indigenous communities and indicate the participation of the members of these communities in the related studies (<u>e.g., archaeological assessments</u>), if applicable.
MCM-05	10.5 (Mitigation and enhancements measures)	<p>Jurisdiction over heritage is shared among levels of government. Heritage sites may be specifically designated as protected sites or may be subject to a blanket system of protection either by legislation or by policy at the federal, provincial, territorial, or municipal level. Information under section 10.4 should also be consistent with the Technical Guidance. Mitigation measures for physical and cultural heritage or any structure, site or thing that is of historical, archaeological, paleontological, or architectural significance can only be identified by qualified persons and documented in technical cultural heritage studies (e.g., archaeological assessment, cultural heritage report).</p>	<p>MCM recommends the following:</p> <ul style="list-style-type: none"> ● Describe the measures that would mitigate any significant adverse environmental effects on Physical and Cultural Heritage or any structure, site or thing that is of historical, archaeological, paleontological, or architectural significance related to Indigenous peoples and non-Indigenous and supported (aka. Known and potential cultural heritage resources) by technical cultural heritage studies; ● provide available information of the effectiveness for all proposed mitigation related to Indigenous rights and interests. Where no information exists, describe plans to monitor the effectiveness of mitigation. The proponent is

Ministry – Comment ID (e.g., MECP-01)	Draft Guidelines Section	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 Guidelines that the text would be added/deleted.
		MCM recommends edits to the bullet around 'culturally significant areas' to address the current legislative framework in Ontario regarding lands owned or controlled by the Crown in right of Ontario or a prescribed public body.	<p>encouraged to share the information available with Indigenous Nations and communities and to monitor the effectiveness of mitigation in cooperation with Indigenous Nations and communities;</p> <ul style="list-style-type: none"> • provide copies of correspondence from the provincial authorities responsible for the conservation of cultural heritage (i.e., Ministry of Citizenship and Multiculturalism). Correspondence should include comments from provincial authorities on the due diligence under legislative and regulatory framework, including comments on technical cultural heritage studies. • In the event that project activities may disturb the soil, on the surface or underground, on federal Crown lands, an archaeological assessment(s) by an archaeologist licensed under the Ontario Heritage Act shall be conducted for the affected lands. Archaeological assessment(s) shall be undertaken during the impact assessment process and prior to any ground disturbing activities. Recommendations from the archaeological assessment(s) will be followed by the proponent.

Insert as many rows as applicable