



# The Corporation of the Township of Huron-Kinloss

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Bruce C Nuclear Project  
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## The Township of Huron-Kinloss comments to IAAC & CNSC on the Draft Integrated Tailored Impact Statement Guidelines and Public Participation Plan for the Bruce C New Nuclear Project

Greetings,

The Township of Huron-Kinloss welcomes the opportunity to provide comments on the Draft Tailored Impact Statement Guidelines (TISG) and the Draft Public Participation Plan for the Bruce C Nuclear Project. The proposed project site is located less than 30km from the Township of Huron-Kinloss and anticipated to have direct impacts to our community and our residents.

These comments are intended to support community well-being and readily position the municipality to support the Bruce C Nuclear Project.

### Overview of the Township of Huron-Kinloss and impact of the Project on the community

Huron-Kinloss is a lower-tier municipal government within the two-tier system, with the County of Bruce as the upper-tier government. The Township of Huron-Kinloss's economy is largely agriculturally based, with agri-food related tourism and agricultural services being developed to support existing tourism activities. It is estimated that 400-500 of the Township's approximately 7700 residents are employed directly by Bruce Power.

Bruce Power is the largest employer in the region and has been an important supporter of the regional and local economy and communities. The development of nuclear energy supports Federal, Provincial and Township goals related to climate change and reducing green house gas emissions.

The Township is located adjacent to the host community for the Proposed Bruce C Nuclear project. As a Significant Neighbour to the host community the Township anticipates that development of these projects will have a significant impact on the Township's residents, services and infrastructure.

The Township recognizes the importance of engaging communities in the development process of these projects, that protection of health and the environment is paramount, and that while these projects are likely to provide economic benefit to the local economy, additional resources and a skilled workforce will be required to ensure the community can support the expected growth and maintain the quality of life for residents.

The Township is pleased to support the project, provided it reflects a collaborative effort between all levels of government, recognizes the impact to neighbouring communities, and the proponent works to address concerns and mitigate impacts on the local communities.

### **Comments on the Draft TISG**

#### *Section 3.5 Workforce Requirements*

The Township is encouraged to see that the impact statement will include a robust examination of the workforce requirements. Consideration should be provided to include the specific effects of a transient workforce, and how this may impact the longer-term population growth and settlement in the area. The shift in population creates an additional strain on community infrastructure, housing and other public services. It also disproportionately impacts marginalized and vulnerable populations, who may be displaced to smaller or more rural communities without access to the same community resources, including transportation alternatives and access to food, pharmacies, etc.

#### *Section 7.2 Baseline Methodology*

The Township anticipates that as a significant neighbour to the projects host community, that consultation will occur with the Township to identify and collect information on the current baseline conditions within our community, so that condition changes and the impact of the project can be ascertained with certainty.

#### *7.3 Selection of Valued Components*

The Township understands that the Valued Components (VC) included in the draft guidelines represents an initial listing, and that additional components may be identified and included as the assessment progresses. The Township is encouraged to see the inclusion of feedback provided in the Initial Project Description commenting phase, respecting Health, social, and economic conditions such as human health and well-being; housing and infrastructure; social and community services; labour; labour and workforce availability; and education and training.

The Township's feedback during the previous commenting period, included an emphasis on the cumulative impacts of the multiple energy projects ongoing within the area. Appreciation is given for the inclusion of cumulative effects into the VC's.

Recognition is given to the fact that some identified areas within the VC's are within the purview of the provincial government, and the Township encourages the province to participate in

consultations on the project and ensure that funding is available to support the project in mitigating impacts in areas such as healthcare, education and housing.

### *Section 9 Health, Social and Economic Conditions*

It is anticipated that there will be a positive direct and indirect economic impact associated with the project, which will contribute to stability and growth within the area. As a local community, the Township has a significant interest in this section as a foundational requirement of the Impact Statement. Municipal input from the Township should be incorporated into the Impact Statement.

Consideration should be given to including within Section 9;

- potential mitigation measures to address the boom bust cycles of the sector taking into consideration the full life cycle of the project,
- impacts respecting income inequalities and impacts on community wellbeing,
- the potential impacts of sex trade and human trafficking impacts with increased transient workforce in the community,
- specific mitigation measures to balance the risk of displacement and uneven distribution of positive economic and social outcomes within the area.

The Township was pleased to see that the document identified that the Impact Statement must “describe any need for government and/or proponent expenditures for new or expanded services, facilities or infrastructure, arising out of project-related effects,” given comments submitted by the Township noting the significant investment which would be required in local infrastructure.

### *Section 16 Follow-up Program*

The Township requests to remain engaged with the public in the Follow-up program, with results of the follow-up program being conveyed.

### **Comments on the Draft Public Participation Plan**

The Township of Huron-Kinloss is concerned by the limited 30-day public comment period for reviewing the draft TISG and Public Participation Plan. Given the technical nature of the documents and the desire for Council review and endorsement, this timeframe presented a significant challenge for municipal and public participation in commenting. The Township would the IAAC consider extending commenting periods outlined in the plan.

Additionally, the plan in Section 3 states that the public must be provided with “the capacity and resources to participate in an informed manner.” As municipalities are not eligible for Participant Funding through the Impact Assessment process, lack of financial support limits our ability to fully engage in the process and provide informed, community-based input. The Township encourages IAAC to establish funding to support municipal participation in future phases of the assessment.

### **Conclusion**

The Township understands and supports the federal and provincial governmental goals to invest in clean energy, including nuclear, and the importance of the energy sector to all Ontario residents.

The Township Council is a strong supporter of the benefit of nuclear energy to the community and the region. The Huron-Kinloss Council supports the work of Bruce Power in advancing the Bruce C Project proposal. The opportunity to be engaged through the formal Impact Assessment Process is appreciated. The Township looks forward to continuing to engage with Bruce Power and the IAAC and CNSC throughout the project development process.

Best regards,

Original Signed by

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