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Addressed To:

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SON's Concerns respecting process and substance of the Draft Integrated TISG for Proposed Bruce C Nuclear Project

DATE: July 22, 2025

Dear Larry and Kirsten,

We write further to the Saugeen Ojibway Nation's ("SON") letter of June 18, 2025. As conveyed in that letter to the Impact Assessment Agency of Canada ("IAAC") and the Canadian Nuclear Safety Commission ("CNSC"), SON was deeply disappointed by the decision to recommence the Planning Phase—a decision which has continued to undermine our ability to engage meaningfully with the federal impact assessment process for the Bruce C Nuclear Project. Our position remains clear—the timelines constraining the current assessment have significantly eroded the value of the process to both support SON's ability to assess and make decisions respecting the

proposal, and to be the basis of sufficient and meaningful consultation and free, prior, and informed consent (“FPIC”) processes between SON and the Crown.

On July 11, 2025, SON again requested Bruce Power¹ to pause the clock and allow more time in the Planning Phase for our work, including meaningfully commenting on the draft (Integrated) Tailored Impact Statement Guidelines (“TISG”).

Disappointingly, Bruce Power refused this request in a letter on July 15, 2025². SON understands that under the *Impact Assessment Act*, IAAC does not have the ability to suspend the Planning Phase; rather, this discretion rests with Bruce Power. However, Canadian law is clear—it is the Crown who owes constitutional obligations to SON, and it is IAAC and CNSC that must ensure that those obligations are discharged through the impact assessment process or through measures outside the process.

We expect IAAC, and the federal Crown more generally, will explain and commit to accommodations that ensure that the time constraints on this phase of the assessment will not compromise SON’s ability to be meaningfully and fully involved—in a manner commensurate with SON’s rights and role in the SON Territory—and will not compromise SON’s ability to understand the potential impacts of this Project on its Territory, People, and Rights and to support informed decision-making.

We have been constantly assured that the current Planning Phase of the assessment process is only that—planning—and that we will have further opportunity to make sure that the assessment is robust and can meet the needs of SON and its members. We do not accept this. The TISG is a critical document that will provide expectations and scope for the assessment. As noted above, assurances are not sufficient; we need commitments, and these commitments must come from IAAC.

It is for this reason that SON provides the following concerns respecting both the process that is being followed for this Planning Phase of the assessment, as well as the content of the TISG document as it stands. These comments are preliminary. We have not had the time needed to review the document in detail, understand the implications of the TISG with our Knowledge Holders, and experts, or receive guidance from the membership. SON leadership has not had the opportunity to consider the TISG and the draft comments raised by our experts. These are serious and consequential limitations which we believe, as has previously been said, have compromised our ability to engage with this process in a way that is consistent with

¹See Appendix B. Letter from SON to Bruce Power dated July 11, 2025.

²Letter dated July 14, 2025, sent to SON July 15, 2025.

our protocols and in a way that would build our trust in this process. We provide these comments to support the ongoing engagement and consultation with IAAC, and the federal Crown more broadly, respecting the assessment process and the work that is required to ensure that the TISG and the planning for the assessment overall will be sufficient to satisfy obligations owed to SON.

1. *Process Concerns*

Since the proposed Bruce C Nuclear Project was first announced, SON has said that although we have serious unresolved concerns with the operation of the existing Bruce facility, we would consider the proposed expansion fully and fairly. We have made considerable efforts to work with IAAC to come to an agreement on how SON and Canada will work together as partners in assessing the Project.

Unfortunately, despite having devoted significant resources and leadership, staff, and advisor time since the fall of 2023 towards engaging with IAAC and laying the groundwork for a collaborative assessment, little progress has been made. Key questions on the assessment process and how IAAC, CNSC, and SON will engage throughout that process remain unanswered, and the relationship agreement we tabled several months ago has not yet been finalized. More recently, Bill C-5 has called into question the nature of the federal assessment process itself and its ability to meaningfully consider and respect Indigenous rights.

Despite the lack of clarity on foundational issues, SON has nevertheless tried to engage in IAAC's assessment process to the extent that the time allotted and our resources have permitted—for example, through our submission of preliminary comments in September on Bruce Power's Initial Project Description. However, SON is challenged by an aggressive timeline that has prevented SON from meaningfully organizing and determining foundational elements of this assessment.

We have repeatedly asked for the time necessary to allow SON to complete necessary internal work—including further work on articulating SON's internal assessment process, identifying valued components (“VCs”) and necessary studies, retaining additional technical experts to fill knowledge gaps, and setting the foundation for engaging our membership—and to advance agreements with Bruce Power, IAAC, and CNSC. These efforts are hampered by SON's actual administrative and governance responsibilities, which continue in parallel. And, we have been clear about the extenuating circumstances in recent months that have impaired our ability to complete this work more quickly—namely, the unexpected Fish Kill Crisis beginning in January 2025, which required an immediate diversion of our leadership, staff, and advisor time and attention.

That the process is continuing to forge ahead over our objections and in spite of explicit requests for a suspension is deeply concerning, particularly given IAAC's commitments to working in partnership with First Nations, and more broadly, Canada's commitments to reconciliation and to upholding the rights under the United Nations Declaration on the Rights of Indigenous Peoples. Further, we have serious reservations about whether the assessment process, as it is currently unfolding, will be able to address SON's concerns and discharge the constitutional obligations owed to SON.

IAAC and SON must meet specifically to address the limitations of the Planning Phase and agree on procedural accommodations to ensure that the assessment will credibly support SON decision-making, and meaningful consultation and FPIC processes between SON and the Crown.

2. Historical Context, Baseline, and Current Conditions

The Bruce Nuclear Generating Station was constructed in the 1960s and 1970s, without any consultation with SON, or regard for SON's rights and interests. The facility has since had significant and devastating impacts—both direct and incidental—on the SON Territory and People.

For fifty years, the facility has, through its once-through cooling water system, drawn and warmed tens of billions of litres of water each day from Lake Huron—waters in which the SON People have a proven treaty right to fish commercially. Although the impacts of that system are not fully understood, SON has long held that the facility has contributed, and continues to contribute, to the deterioration of the lake and the SON fishery, a fishery which is now widely acknowledged to be on the brink of collapse.

And while the facility's aquatic impacts have been a central concern of SON's, the effects of the facility and associated development in the zone of influence ("ZoI") extend well beyond the aquatic environment to include impacts to the land, archaeology and cultural heritage, and hydrological, hydrogeological, socio-economic, socio-cultural, and psychosocial elements. The facility has been a major economic driver in the SON Territory—creating thousands of jobs and bringing considerable wealth to the region. Unfortunately, the SON People have been almost entirely excluded from the economic benefits of the facility. Instead, the SON People have been impoverished by the nuclear industry's operations in the SON Territory, which have widened the socio-economic gap between SON and surrounding communities, raised housing and living costs beyond the reach of many of our members, and alienated both SON commercial fishers and subsistence harvesters

from their livelihoods in the nuclearized area and beyond. Indeed, many SON members will not eat fish from Lake Huron because of their fear of contamination from the nuclear facility.

Consequent impacts to SON's way of life and to the well-being of SON members in this 50-year period have had a significant and profoundly negative impact on how SON members experience their world, the patterns of their daily activities, and their mental health. Stress associated with the Bruce facility and the nuclear industry have resulted in psychosocial impacts to SON that interact and intersect at the individual, family, community, cultural and social levels. The proposed Project represents a continuation and exacerbation of these stressors and an additional risk to SON way of life and mental well-being.

The impact assessment must take this context into account—that is, the extent to which the aquatic, terrestrial, social, health, economic, cultural and heritage elements in the SON Territory have already been impacted and may deteriorate, in no small part, due to the past and ongoing activities of the nuclear industry and the infrastructure supporting the industry. The current degraded physical and social environment, within which SON members cannot meaningfully exercise our Aboriginal and Treaty rights or thrive, does not represent an acceptable baseline. The SON People must be able to rely on the SON Territory, and to exercise our constitutionally protected rights. Within the current context, each additional impact is synonymous with cumulative loading and, from SON's perspective, pushes SON further away from an acceptable threshold of significance. Further, in this context, it becomes imperative that assessments consider the ability of new proposals to ameliorate, rather than to further deteriorate, existing conditions. The TISG must acknowledge this context and correctly establish and account for a heavily damaged baseline condition by assessing this proposal according to a pre-treaty baseline.

3. Spatial Boundaries and Scope of Impacts

The impact assessment process must also acknowledge that nuclear development in SON Territory has had—and that the proposed Bruce C Nuclear Project would have—far-reaching impacts extending well beyond the perimeter of the Bruce site. The TISG must direct Bruce Power to fully study these impacts in the appropriate Zol. While many of the proposed Project's activities and direct impacts would take place in the immediate vicinity of the Bruce site, the proposed Bruce C Nuclear Project would, like earlier nuclear development in the Territory, bring thousands of contractors and new staff to the region, result in significant new housing needs, require new and additional infrastructure in the region, likely require resource

extraction (e.g., aggregate) from sites in SON Territory, and have other extensive impacts. As an example, the current TISG fails to consider these implications, with discussions on existing services and infrastructure limited to listing current assets. This misses the important context of whether these assets are currently functional and can accommodate existing or anticipated future stressloads. It is imperative that Bruce Power, IAAC, and CNSC work directly with SON to determine appropriate spatial boundaries, assessment scope, and the social area of influence.

4. Indigenous Nations and Communities

As SON has previously communicated to IAAC, SON expects that the TISG and Indigenous Engagement and Partnership Plan (“IEPP”) will recognize SON as the Indigenous People of Saukiing Anishinaabekiing, an area which encompasses much of the Saugeen (Bruce) Peninsula, and in which the Bruce site is situated.

SON further expects that the TISG and IEPP will distinguish between any obligations owed to SON, as a recognized rights holder, and Indigenous groups with assertions to rights in the vicinity of the Bruce site. While IAAC may take the view that it must consult any Indigenous groups with assertions to rights, IAAC cannot take the position that they are owed the same obligations as SON. SON has done extensive research on assertions to rights in the SON Territory and would be pleased to share the results of this research with IAAC and CNSC. IAAC, CNSC, and Bruce Power must review and incorporate into their processes the findings of a [recent report by Dr. Bohaker and Dr. Murdoch](#)³.

This expectation is particularly so with respect to the right to FPIC. SON expects the TISG to explicitly recognize the need for SON’s FPIC to be obtained, rather than speaking in general terms about FPIC from “Indigenous Nations and communities.”

5. Identification of Valued Components and Necessary Studies

SON is an integral party to this impact assessment of the proposed Bruce C Nuclear Project. It is crucial that SON and SON Knowledge be included in the impact assessment, including fundamentally during the Planning Phase. The gaps in knowledge of other parties are evident in our initial review of the Integrated TISG⁴.

³This report is titled “Assessing Metis Historical Claims to Rights in SON Territory”. SON has invited all parties to a presentation on the report. A summary of the report can be found [here](#).

⁴ The inclusion of American Eel as a VC provides a useful example. American Eel exists in Lake Huron only as the occasional stray facilitated by the opening of canals like the Welland canal. Lake Huron does not contribute meaningfully to American Eel populations and American Eel is therefore not a relevant VC. Its inclusion as a VC represents a misunderstanding of local ecology, and an ineffective use of time and resources that should be devoted to the study of meaningful VCs. There are also concerning omissions in the current TISG including no

VCs are a critical part of impact assessment as they provide the foundation for the assessment of a proposal's effects. SON has long said that SON—and, specifically, the SON membership—must play a central role in identifying and describing VCs. SON's technical experts have completed extensive work on the identification of VCs, however, to date, sufficient input from the membership has not been possible for reasons stated above. Similarly, SON must be centrally involved in determining the studies required, along with their scope and design and, where appropriate, their implementation. And, in some cases, studies must be carried out by SON independently.

SON has been assured that the Impact Statement Phase will include continued engagement with SON and that VCs can be selected during those engagements. Here too, we require more than just assurances—we need commitments and a process for how our growing understandings and contributions on VCs will be incorporated and reflected in the assessment. Further, SON also understands that final selection of those VCs will be made by the proponent and not by SON, removing an important aspect of agency and, potentially, meaningfulness from the impact assessment process. SON will not accept an assessment that ultimately fails to include VCs and necessary studies that are understood as important by its membership.

6. Alternatives

As outlined above, the degraded state of the SON Territory requires that consideration be given to whether a proposal can ameliorate, rather than place further stress upon, the environment. Project design and careful consideration of alternatives become imperative. This is particularly so for those parts of a proposal which have the potential to further impact elements of the environment that are already under considerable stress, and in particular the aquatic environment of Lake Huron. Our experience of the existing facility, as has been made clear by the recent Fish Kill Crisis, is that the once-through cooling systems of Bruce A and B have unacceptable and unsustainable adverse effects on the aquatic environment. As we have made clear—SON does not believe the lake can bear another stressor of this magnitude. For this reason, the TISG must direct Bruce Power to fully consider alternatives to a once-through cooling system and to provide every opportunity to SON to be involved in the development and assessment of alternatives.

mention of a registered ancestral site of critical importance (referred to as Upper Mackenzie/BbHj-6), which has already suffered historical impacts.

7. *Offsetting*⁵

SON must play a central role in the design of impact avoidance, mitigation, offsetting, and enhancement measures to ensure they are culturally appropriate, ecologically meaningful, and rights-based. These measures must include measures to address any anticipated or unanticipated harms to both the environment and SON's ability to derive meaningful benefits from the SON Territory. The recent Fish Kill Crisis, in which millions of fish were killed at the Bruce site, provides a clear example of why such measures are required. The event caused serious and measurable harm to the aquatic ecosystem and to SON's relationship with the land and waters, and associated constitutionally-protected rights. To date, no restitution measures have been proposed that would meaningfully compensate SON for the impacts of this disaster. The crisis was not foreseen in previous assessments and likely would have been dismissed if presented as a risk scenario. Future operations, follow up and monitoring efforts intersecting with SON rights must include SON representation in their design and implementation.

Next Steps

To date, SON subject matter experts have pre-emptively flagged draft comments on every single section of the TISG. These draft comments are as-yet incomplete and have not been vetted by SON leadership. SON requires additional time to complete this review process before the comments can be shared.

SON expects that we will now arrange for a series of meetings with IAAC representatives to address the concerns raised in this letter, both substantive and procedural. We require specific process accommodations to ensure that legislative and policy time restrictions constraining the assessment process will not compromise the function of the review to inform SON decision-making, FPIC and consultation processes. This must include specific commitments on how SON's growing understanding of the necessary scope of the assessment will be incorporated and implemented. We also expect that IAAC's commitment to SON to conclude a more comprehensive agreement for all assessments within SON Territory continues to be a matter for our engagement.

⁵ SON does not accept, generally, agree with the concept of offsetting. First, ecological components are not fungible; they cannot be swapped out one for one. Second, historically, offset measures have been chosen that do not support SON values, but the priorities of other, non-rights bearing communities (e.g. stocking of non-Indigenous fish). These measures, at times, have had additional negative effects on SON VCs.

We ask that you coordinate with Bob Nickel at bnickel.energy@saugeenojibwaynation.ca to make arrangements for our next meeting.

Regards,
<Originally signed by>

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Senior Manager, Saugeen Ojibway Nation Environment Office

CC:
Owen Tanner, Energy Manager, Saugeen Ojibway Nation Environment Office
Bob Nickel, Energy File Coordinator, Saugeen Ojibway Nation Environment Office
Emily Martin, Bruce C Project Manager for Saugeen Ojibway Nation Environment Office

Appendix A - Initial and General Comments from SON on the Integrated Tailored Impact Statement Guidelines for the proposed Bruce C Project

Note: the following does not in any way represent SON's fulsome comments from a thorough review of the TISG. SON has not yet been provided sufficient time to do that important work.

To date, SON subject matter experts have pre-emptively flagged draft comments on every single section of the TISG. These comments are as-yet incomplete and have not been vetted by SON leadership. SON requires additional time to complete this review process before the comments can be shared.

SON's Processes
The TISG must enshrine SON's ability to run SON's own meaningful processes to assess the proposed project. In section 10 of the TISG, IAAC must add language that "BP must respect and allow appropriate time for a SON-led assessment, and respect the outcomes of SON's own assessment."
Baseline Conditions, Consideration of Past Impacts
The TISG needs to explicitly recognize that significant changes to the overall landscape including the terrestrial environment, ancestral sites, surface water and groundwater and their interdependent connections have occurred within the site and throughout Saukiing Anishnaabekiing (Saugeen Ojibway Nation's Territory) as a result of the construction, operation and decommissioning of multiple nuclear reactors at the site since the 1960's. See comments below on the <i>Zone of Influence</i> ("Zol"). This applies to baseline conditions and past impacts as well. Pre-treaty conditions at the site and throughout the Zol are the appropriate historical baseline upon which to assess the cumulative (past, present and potential future) effects (environmental, cultural, social and economic) of nuclear development. This terrestrial Zol should equate to the "regional study area" ("RSA") of the TISG, and needs to encompass: <ul style="list-style-type: none">- the entire area within Saukiing Anishnaabekiing in which facility (i.e., Bruce Power, OPG, Hydro One) staff and contractors live and commute to work at the site;- any land-based developments, infrastructure and activities that would not be present in Saukiing Anishnaabekiing were it not for the nuclear development at the site;- any resource extraction sites from which aggregate has been, is currently, or will be used to construct facilities associated with the nuclear development at the site;- sites of any kind within Saukiing Anishnaabekiing at which disposal of waste (solid, liquid or radiological) associated with the nuclear site, its operations, its workers, and the business activities that support Bruce Power operations has

<p>occurred, occurs or is proposed.</p> <p>Furthermore, conditions at the time of signing of Treaty 45-1/2 (Saugeen Purchase) should inform the understanding of ecologically “healthy” lands, waters and native species populations in the regional and local study areas.</p>
<p>The “Technical Guidance for Assessing Current Use” document referred to in the draft TISG indicates that “use” may include “traditional governance” and that “uses that may have ceased due to external factors should also be considered if they can reasonably be expected to resume once conditions change. [For example] land disturbance from a previous project...may have affected the habitat and abundance of a...species resulting in a reduction of traditional hunting on that land.”</p> <p>In this context, the TISG must include wording that explicitly recognizes the legacy issues relating to the absence of meaningful consultation with SON since the original planning for nuclear development at the Douglas Point site pre-1960, and opportunities that may exist for (ecological) restoration that would support resumption of traditional uses and good stewardship of the land.</p>
<p>Restoration expectations must be to a baseline that reflects what SON has lost. Need to reflect up front a holistic approach to the cumulative impacts again on what SON has lost—not just against Bruce C. A very considerable amount of impact that has already occurred is irreversible, even with robust restoration and offsets</p>
<p>It is important to ensure that the baseline for the assessment and impacts be measured against the time of treaties. What would SON territory have looked like at this time? What were the natural abundance, benefits and the relationship SON had at this time with the natural environment? We also have to measure past and current conditions in order to make predictions and measurements about impacts from a proposed Bruce C.</p>
<p>The bounty of the lands and waters that sustained SON since time immemorial has been greatly eroded as a product of colonization. A good example of this is the relationship with the fish that provided food, trade, and ceremony for SON. As a result of numerous anthropogenic factors including invasive species, the SON fishery is almost gone. The high rate of poverty and associated social impacts are not acceptable. As a result, SON is only interested in projects in the Territory that fulfill our vision of prosperity. Projects need to align with SON's vision and include net ecological, cultural, spiritual, and economic benefits.</p>
<p>Baseline conditions should be referenced relative to a healthy baseline for environmental, health, social, and economic conditions. Indigenous-identified valued components should make use of a healthy baseline established by Indigenous groups. If no healthy baseline is identified, a clear point in time should be used where Indigenous way of life was considered to be healthy and sustainable (e.g., pre-contact, or pre-treaty).</p>
<p>Effects assessment must compare existing conditions against a healthy baseline to establish how close each valued component is to an unacceptable threshold (i.e., any impact beyond that level is considered significant and must be mitigated or compensated). Within this context, there is also no recognition that current conditions reflect a heavily damaged baseline which must be treated accordingly. For example, SON way of life has already been significantly and adversely affected</p>

by the nuclear industry, so any additional adverse effect of the project would itself be significant unless it is accompanied by restoration measures to avoid or restore undesired impacts.

Health considerations include focus on social determinants of health for affected Indigenous Nations and communities but lack detail on the standards and expectations for this assessment. Given SON's turbulent history with the nuclear industry and the Bruce facility, SON insists on the assessment of changes to SON lifestyle, lifescape and lifestrain in conjunction with the nuclear industry and how that places the current mental-health and well-being of SON, including the coping resources of the community and overall psychological functioning. This information is an important component to understanding the existing baseline conditions and how the project stands to add to, exacerbate, or otherwise alter psychosocial impacts and health of SON and SON communities.

Zone of Influence ("Zoi")

Causes of changes in the past (since nuclearization in the 1960s), present, and reasonably foreseeable future include staff housing in the region, and commuting needs, services to support staff and contractors, all infrastructure associated with the nuclear operations and staffing of the facility, resource extraction and related economic activities throughout the Zoi that have supported the development and continue to support nuclear operations in Saukiing Anishnaabekiing. This includes impacts such as aggregate extraction. All of this activity is caused directly by nuclear development.

Spatial and temporal boundaries must be valued-centric and not project-centric. This distinction makes a significant difference on how meaningful and impactful the IA assessment is. A valued-centric approach correctly positions baseline conditions and potential project-effects in the context of the health and sustainability of each valued component. By contrast, the project-centric approach limits the scope of assessment to more immediate interactions between the VC and project-components. The former are more accurate metrics of how VCs will be affected by the project while the latter provides a more straight-forward approach focusing on the project. The choice between valued- or project-centric has a significant impact on the cumulative effects assessment ("CEA"). A valued-centric approach will result in a CEA that gives greater consideration to indirect and incidental impacts on a VCs health. By contrast, a project-centric approach will arbitrarily limit the scope of assessment to an area around the project and typically fails to consider incidental effects, making it easier to discount residual and significant effects. A valued-centric approach is recognized as a best-practice in IA. Despite that, Mega Projects prefer to use a project-centric approach because it is easier to administer and makes it easier to limit the project's sphere of influence and consequent significance determination.

Consideration of the larger Zoi is critical and must include impacts to SON's cultural heritage and archaeology. There have already been significant impacts to SON's cultural heritage and archaeological sites in the region due to population and development influx associated with the nuclear facility. Likewise, the prospect of the Bruce C expansion, new temporary and permanent workers, and all associated development, would compound impacts on archaeology and cultural heritage resources in SON Territory and the Zoi (especially given that building

permits will not typically trigger archaeological assessment). Significant effort must be made to prevent future impacts but also to address existing impacts.
For a project of this magnitude, it is necessary to work with SON to carry out an analysis to identify appropriate spatial boundaries, including at the local and regional scales.
Archaeology
Concerns that the Valued Component in relation to Cultural Heritage / Archaeology (p.45) is insufficient (brief and broad). SON VCs must be incorporated fully to address that and to provide detail, clarity and meaning. As it stands, the basic umbrella VC does not really acknowledge what little we know in terms of documented impacts, how much we don't /the archaeological assessments and studies that are necessary to begin addressing that and to document / understand cumulative effects and impacts, etc.
It is critical that the necessary terrestrial and marine archaeological studies as outlined by SON be completed and supported by the proponent, including access to all areas contained within the fenced perimeter for study and including any culturally significant areas identified by SON elsewhere on the properties and in the vicinity. These studies must not be limited in scope and must be designed and conducted in consultation with SON, and in some cases led by SON (as with the previously identified Culturally Sensitive Areas).
All documented indigenous archaeological sites within the fenced perimeter and the vicinity of Bruce Power (e.g. Inverhuron, etc.) are ancestral to SON. 'Engagement with Indigenous Nations and Communities' regarding Archaeology and Cultural Heritage matters should reflect this and acknowledge SON's unique and singular role in directing the necessary cultural heritage / archaeological studies and making any determinations regarding such matters.
Identification of Valued Components
The choice of American Eel as a valued component is an excellent example of why it is so critical that SON lead the selection of valued components. Any American Eel that might be found in Lake Huron are likely strays as a result of human made canals. It is unlikely that any meaningful positive impact on reproduction or the American Eel occur as a result of the presumably occasional stray into Lake Huron. Furthermore, to SON's knowledge there is no cultural connection to American Eel in Lake Huron.
Radiation Safety, Emergency Planning, and Nuclear Accidents
The engagement of SON in the assessment of radioactivity in the Territory is required. Any additional nuclear facility adds to the existing risks from routine operations and nuclear accidents. SON's engagement in the notification and response capacity for the safety of its membership is essential. SON's responsibility to its members for ensuring a safe and protective environment, addressing all radiological concerns—radioactive waste, transportation, accumulation of radioactive materials in fish and wildlife, risks from accidents—requires capacity building and integration in an independent oversight role. Defining the scope, Territory demographic and environmental characteristics needed for an in-depth assessment of environmental impact for potential nuclear accidents from the expanded nuclear capacity requires SON's engagement. Despite information available from annual EPRs and periodic IEMPs, SON remains concerned about

radionuclides in fish and other harvested food. This is one facet of many issues that influence concerns regarding food security and food sovereignty that should be addressed.

Restitution

Appendix 1 contemplates the use of offsets and compensation; however, SON believes that a more comprehensive approach is required. Specifically, SON seeks the development of a clear and enforceable restitution plan that addresses harms to both the environment and SON's ability to derive meaningful benefits from their Territory, including economic, ecological, food, ceremonial, and spiritual values.

A clear example of the need for such a plan is the 2025 gizzard shad fish kill crisis, in which millions of fish were killed as a result of Bruce Power operations. This event caused serious and measurable harm to the aquatic ecosystem and to SON's relationship with the land and waters. To date, no restitution measures have been proposed that would meaningfully compensate SON for the impacts of this disaster.

With respect to offsets under the Fisheries Act, SON must play a central role in the design, selection, and approval of offsetting measures. Many existing offset approaches have proven inadequate, and in some cases, entirely inappropriate. For example, using the reproduction of exotic and invasive salmonids as a measure of success for a dam removal project is fundamentally incompatible with SON values and priorities. SON has consistently opposed the ongoing introduction of non-native species into their Territory, given the well-documented negative impacts on native ecosystems and cultural practices.

Going forward, compensation and offsetting frameworks must be co-developed with SON to ensure they are culturally appropriate, ecologically meaningful, and rights-based. Anything less perpetuates harm and fails to uphold the Crown's obligations to SON.

Spatial and Temporal Scales

The Impact Statement must define spatial and temporal boundaries from the perspective of values instead of the perspective of the Project.

This distinction will lead to a substantial and meaningful difference in the process and outcomes of the IA. A valued-centric approach will correctly position baseline conditions and potential Project effects within the context of the health and sustainability of each VC. By contrast, a project-centric approach will limit the scope of assessment to more immediate interactions between the VC and Project components and activities. A valued-centric approach will provide more accurate metrics of how VCs will be affected by the Project, while the project-centric approach will provide a more straight-forward approach, focusing solely on the Project.

The choice between valued- or project-centric approaches will have a substantial impact on the cumulative effects assessment ("CEA"). A valued-centric approach will result in a CEA that gives greater consideration to indirect and incidental

impacts on a VCs health. By contrast, a project-centric approach will arbitrarily limit the scope of assessment to an area around the Project, which typically fails to consider incidental effects, making it easier to discount residual and significant effects.

A valued-centric approach is recognized as a best practice in IA. Despite that, megaprojects prefer to use a project-centric approach because it is easier to administer and makes it easier to limit the project's Zol and the consequent significance determination.

The Impact Statement must integrate SON's perspectives on temporal boundaries.

The Impact Statement must define temporal boundaries by looking back 7 generations and looking forward 7 generations.

The Proponent must work with SON to identify temporal scales that account for 4 seasons of change, while also making considerations for long- and very long-term factors, such as cumulative effects from development, including climate change and its impact on Lake Huron water levels.

The Impact Statement must describe past, present, and reasonably foreseeable future biophysical, health, cultural, social, and economic conditions for SON and SON People.

The Impact Statement must describe past, present, and reasonably foreseeable future uses of lands and resources for SON and SON People.

With the exception of section 10, the requirements for the identification and description of baseline conditions and adverse impacts on Indigenous groups appear to be arbitrarily limited to "current use" (e.g., "current use of lands and resources for traditional purposes" on p.5). This is an arbitrary limitation on the temporal scope of the IA. Current use does not represent the full complement of traditional land and resource use ("TLRU"). Current use represents a significant reduction in TLRU areas from the historic baseline as a result of habitat disturbance, destruction, exclusion, and avoidance. In the case of SON, it is well established that the nuclear industry has had significant adverse impacts on terrestrial and aquatic land and resource use. SON's aspirations for the continued cultural, physical, and mental health of its members is that they are able to revitalize traditional territories to practice TLRU activities. This puts the planned project activities in a position of conflict should they overlap in time and space with TLRU areas that are not actively used today or which have been affected by the nuclear industry). Refer also to comments regarding how to consider VCs with a heavily damaged baseline.

Cumulative Effects

The selection of incidental activities must also consider spin-off effects on local economies and communities. If the project might have a significant impact on in- or out-migration, create a resource boom (or a resource bust if the project does not proceed), then these activities need to be accounted for. It is not reasonable to identify all of the potential activities in each section. Rather, every distinct section of the TISG should include a requirement to investigate reasonably anticipated incidental activities.

Bruce A and B, the Western Waste Management Facility, and the continued accumulation of waste must all be considered in the cumulative effects study.

Mitigation Measures

The Impact Statement must account for and describe SON's rights, interests, roles, and responsibilities within the design and integration of mitigation measures.

The Impact Statement must outline the Proponent's responsibilities and obligations in funding and administering the mitigation measures.

The Impact Statement must provide a goal and intent statement for each mitigation measure, clearly summarizing its purpose, and a link to an adaptive management framework that enables flexibility to adjust the design of the mitigation if it is not working as intended or if undesired impacts are observed despite successful implementation.

The Impact Statement must provide an implementation schedule for mitigation measures that ensures that they are sufficiently operational prior to the anticipated Project-related impact occurring.

Project Alternatives

In all aspects, Bruce Power must meaningfully consider alternatives to this project. Specifically, alternate siting locations and technologies must be thoroughly explored. Alternatives which are already deemed impossible or impractical, are not real alternatives.

SON Worldview

The current TISG lacks inclusion and reflection of SON's worldview. For example, the document does not mention the spirit of the land and water, and only contemplates these from a western science perspective. This revision must come through work with SON, including sufficient time to do this work meaningfully. This worldview may be reflected in Valued Components, but should not be limited to or hidden in VCs, it should be reflected throughout (e.g. in methods).

Appendix B - Letter from SON to Bruce Power July 11, 2025 Requesting Additional Time to Appropriately Review the Integrated TISG

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SON's Concerns About Bruce C Assessment Timeline, July 3rd Discussion

July 11, 2025

Kathleen Ryan, Director of Strategic Partnerships & Initiatives, Bruce Power

Dear Kathleen,

Re. SON's Concerns About Bruce C Assessment Timeline, July 3rd Discussion

The SON Environment Office is writing to follow up on our July 3rd meeting. At that meeting, we discussed the current timeline for the impact assessment of the proposed Bruce C project, and we reiterated SON's frustration with the timeline for the following reasons:

1. **There is still no agreement in place** between Bruce Power and SON regarding how we will work together in the assessment of the proposed Bruce C project
2. SON is working actively on foundational pieces which are critical to establish at the planning stage of the impact assessment process:
 - a. **Articulating SON's assessment process** for the proposed Bruce C project
 - b. **Clarifying SON's Valued Components** with regard to the proposed Bruce C project

As we conveyed, SON had begun this work as planned, but SON's capacity was severely impacted by the Gizzard Shad Kill crisis starting in late January which delayed critical work, including building internal capacity on the Bruce C file. This capacity has only recently come online, allowing our work to begin in earnest.

SON remains disappointed with Bruce Power's decision to prematurely press forward on the assessment process for the Bruce C project and is concerned that

Bruce Power's decision will compromise the robustness and credibility of the process.

SON is working hard to advance our planning work on the assessment, but we need adequate time and space to do so. Specifically, **we need additional time to appropriately review the draft Integrated Tailored Impact Statement Guidelines** (TISG). We ask again that you consider suspending the timeline for the planning phase to allow SON the time it needs to complete its work with Bruce Power and the Impact Assessment Agency of Canada (IAAC), as well as with its experts and membership, to allow SON to meaningfully participate at this critical stage of the impact assessment process.

This time would also allow us to ensure that IAAC, and potentially Bruce Power, understand SON's comments on the TISG. It is not appropriate for this critical work to be pushed to the impact statement phase; this work can only be done appropriately in the planning phase.

After our meeting, you committed to following up internally about the most effective pathway for resolving SON's concerns about the current timelines. We look forward to hearing back from you.

Miigwetch,

<Originally signed by>

Bob Nickel

Cc Joanna Moffat, Technical Officer, Indigenous Engagement & Partnerships,
Bruce Power
Owen Tanner, Energy Manager, SON
Emily Martin, Bruce C Project Manager for SON, Emily Martin Consulting