



The Joint Chiefs and Councils  
of the Saugeen Ojibway Nation

November 3, 2025

Larry Shuter  
Senior Policy Analyst, Consultation Operations Division  
Impact Assessment Agency of Canada

Marina Martin  
Policy Officer, Indigenous Consultation and Engagement Division  
Canadian Nuclear Safety Commission

Mike Rinker  
Vice President, Regulatory Affairs  
Bruce Power

Joanna Moffat  
Technical Officer, Indigenous Engagement & Partnerships  
Bruce Power

Dear Mr. Shuter, Ms. Martin, Mr. Rinker and Ms. Moffat:

**Re: Saugeen Ojibway Nation Additional Comments on the Bruce C Project Assessment**

We have enclosed with this letter additional comments from the Saugeen Ojibway Nation (SON) on the information that Bruce Power must produce as part of the assessment of the Bruce C Project (the Project).

Since the Bruce C Project was first announced, SON has been clear that we are willing to consider the proposal with open minds, but that the Project and its impacts must be carefully assessed and considered before any decision is reached on whether it should proceed. Through the enclosed comments, we are providing instructions to guide Bruce Power in gathering information on those potential impacts. These instructions add to those articulated by the Impact Assessment Agency of Canada (IAAC) and Canadian Nuclear Safety Commission (CNSC) through the Integrated Tailored Impact Statement Guidelines. They set out SON's requirements, based on SON's values, laws, teachings and knowledge system.

Our comments are extensive, however, we believe the information we have identified is critical to support credible decision-making by SON—as well as Bruce Power and Canada. SON is responsible to protect the SON Territory and the rights and interests of our People, and our decisions respecting proposals in our Territory must be informed. We can only exercise our right to free, prior, and informed consent and

determine if a proposal will protect, restore, and achieve our vision for the land, waters, way of life, and the well-being of all our relations if we have sufficient information on how that proposal will interact with our Territory.

In the coming weeks, we will need to discuss how Bruce Power intends to address the requirements we have articulated, as well as those identified by IAAC and CNSC. We also expect to have further discussions with IAAC and CNSC on how Canada intends to respect SON's decision-making process regarding the Project.

We understand from discussions and the recent signing of the project charter by Bruce Power and Canada that Bruce Power and Canada are of the view that the federal review process for the Bruce C Project could potentially be completed in three years, with the preparation of the Impact Statement requiring less than one year. We remain deeply concerned by this. That the studies under the federal impact assessment process could be completed within a few months and their results analyzed and summarized within the year is unreasonable.

We have heard the argument advanced that the Bruce site has been extensively studied and that there is data to support an expedited process. As we have conveyed previously, we disagree strongly. Much of the existing data is incomplete and outdated. The recent gizzard shad crisis which killed around four million fish earlier this year clearly illustrates that we still fail to understand critical and fundamental impacts of the environment around the Bruce facility and the extent of its very significant adverse impacts. Where Bruce Power intends to rely on existing data and studies, that data must be identified and shared with SON without delay to allow SON and Bruce Power to discuss its limitations and the work required to address its gaps.

If you have any questions respecting the above or the enclosed comments, please do not hesitate to reach out. Please note that the comments we are providing are not exhaustive. As we have previously communicated, we intend for our membership to be intimately involved in considering the Bruce C Project. We expect that through engagement with the membership, new concerns and questions regarding potential impacts may arise and warrant additional studies. We will bring these issues to Bruce Power, IAAC and CNSC's attention as they are identified.

Miigwetch,

<Original signed by>

Lester Anoquot  
Saugeen First Nation

<Original signed by>

Paul Jones  
Chippewas of Nawash Unceded First Nation