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March 6, 2026

Kalena Lair, Program Manager, Regulatory Affairs
Joanna Moffat, Technical and Administrative Lead, Indigenous Engagement & Partnerships

Re. Work Required for Bruce Power's Workplan for Bruce C

Kalena and Joanna,

I am writing on behalf of the SON technical team, including SON's subject matter experts, regarding the SON Impact Statement Phase Workplan (the "Workplan") and the Impact Statement Schedule Update shared by Bruce Power in February for the Bruce C Project (the "Project").

SON's team has reviewed the documents. While they provide more information than those shared in December, they still lack the level of detail required to understand how Bruce Power intends to assess the Project's potential impacts. Given Bruce Power's stated intention to submit the Impact Statement in August, SON expected a clearer and more comprehensive description of the assessment approach, including how Bruce Power plans to meet the requirements set out in the Tailored Impact Statement Guidelines and in SON's previous submissions. Instead, the documents provided set out only at a very high level the steps involved in preparing the Impact Statement and a list of studies and associated timelines. The lack of information provided by Bruce Power so far makes it impossible for SON to assess whether Bruce Power's work in support of its Impact Statement will be sufficient or credible.

We understand that Bruce Power views the Workplan and Impact Statement Schedule Update as a starting point for discussion and that your team wishes to meet in person to advance technical work. However, as we have consistently communicated, SON believes that in person meetings can only be productive once Bruce Power has provided adequate information on the work it proposes to undertake and on what it considers achievable within the current timelines. Meaningful discussions also require that Bruce Power demonstrate efforts to integrate and respond to the extensive comments SON has already provided.¹ To

¹ SON has submitted extensive comments related to the Project. This includes written comments on the Initial Project Description, comments shared through meetings including

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date, SON has received no substantive response to our extensive comments—only a request to meet. Given that the proposed timeline for the completion of the Impact Statement is August 2026, we find it inconceivable that Bruce Power is not able to provide the information we are seeking.

Without a real workplan and a response to SON's extensive comments, SON cannot understand the work Bruce Power intends to undertake, where there may be alignment, and where SON and Bruce Power diverge on what is required. SON's team has been able to extract limited information from the recent reports Bruce Power has shared.² However, these reports cover only a few discrete study areas and, even then, address only a narrow set of questions. They do not shed light on broader issues such as how effects beyond the local study area or cumulative effects will be assessed. Given that Bruce Power intends to submit its Impact Statement in less than six months, SON cannot reasonably be expected to piece together this information in a piecemeal manner over the coming weeks and months. SON requires a comprehensive workplan and a response to our earlier comments. If Bruce Power requires clarification on any of those comments, SON can provide additional information once Bruce Power has identified which comments require further explanation.

SON is now very concerned that there simply is no time for meetings aimed at advancing technical work on the Workplan, and more importantly, on the design and implementation of the studies themselves. SON has repeatedly stated that it does not support the timelines proposed by Canada and Bruce Power. The Project has the potential for significant impacts—impacts that will act on an already deeply impacted environment and People—and these must be studied carefully and credibly. SON rejects Bruce Power's assertion that the Bruce site has been extensively studied and that the assessment is largely an exercise in compiling existing data. The recent gizzard shad crisis, which resulted in the death of approximately 5,000,000 fish, underscores SON's longstanding concerns about the adequacy of Bruce Power's studies and the limited understanding of the facility's interactions with the environment.

subject-specific workshops, and SON's more than 500 comments on the Integrated Tailored Impact Statement Guidelines.

² These reports are the Ecological Land Classification, 2025 Field Summary Memo; Wetland Functions Assessment, 2025 Field Summary Memo; and Chimney Swift Habitat Assessment.

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SON has called on Canada and Bruce Power to revisit the timelines they have committed to and to work with SON to design a credible, robust process capable of addressing current knowledge gaps. Without adjustments, there will not be sufficient time to properly assess the Project's impacts or to modify the Project in ways that would avoid, reduce, or mitigate those impacts. Our view is that the assessment process, under the current timelines, is fundamentally flawed and cannot produce a credible assessment.

The Workplan itself does not reflect these positions. In fact, it states that it was "collaboratively developed by Bruce Power and SON as a planning tool" and characterizes routine meetings between the SON Environment Office and Bruce Power as supporting "collaborative engagement to support the ability for SON to meaningfully participate in the development of the Impact Statement and LTPS application." These statements misrepresent the current situation. SON has played no part in drafting the Workplan. SON has raised serious concerns, and neither Bruce Power nor Canada has provided any indication of how the Project's impacts—or potential modifications to address them—can be credibly evaluated within the proposed timelines. Bruce Power has given us no commitments that timelines will be changed to accommodate the work necessary.

SON remains committed to ensuring that the Project is rigorously studied and had hoped for a more collaborative approach. However, until SON has assurance that a collaborative approach can be accommodated within a credible assessment and that SON's concerns will be meaningfully addressed, SON must focus its energies on the formal requirements of the current assessment process to ensure SON's positions are accurately represented and SON's concerns are fully understood and assessed through the assessment process itself.

SON looks forward to receiving more complete, detailed technical information from Bruce Power. Once that information is provided, SON will be better positioned to comment on the adequacy of Bruce Power's proposed approach. For reference, SON has included in Appendix A a non-exhaustive list of examples of critical information needed to support the preparation of an appropriate workplan.

Owen Tanner
Manager, Saugeen Ojibway Nation Environment Office

APPENDIX A

As noted above, the below constitutes a non-exhaustive list of the kind of information that SON's technical team would expect to see in a workplan for Bruce C. These expectations are made in the context of SON already having provided extensive input to the Bruce C impact assessment process.

1. Rationale for the Local Study Area (LSA) and Regional Study Area (RSA)
 - o The workplan should include the rationale and criteria used by Bruce Power to delineate the study area for each valued component (VC) or area of study
 - o Ideally, Bruce Power should define/delineate (or approximate) the LSA and RSA based on the extensive SON input to date
2. The baseline(s) data sets to be used (for each VC and/or area of study, if they vary)
 - o Baseline(s) must consider cumulative effects of nuclearization
 - o The workplan should include the rationale for why a particular baseline(s) is/are proposed
 - o If Bruce Power has not yet defined the baseline(s), the workplan should include a description of the process that will be used to define the baseline (for each VC or area of study, if necessary)
3. The process by which data/information contained in the information sources identified by Bruce Power in its earlier "preliminary workplan" will be analyzed to support the impact assessment
 - o The preliminary workplan lists information sources Bruce Power intends to rely on but does not explain how Bruce Power intends to use the listed sources
 - o The workplan needs to identify data gaps in the existing information sources and articulate how Bruce Power intends to address those data gaps, with realistic timelines, to fully understand the potential impacts of the proposed Bruce C as well as the cumulative effects of nuclearization
 - o The workplan should identify the steps involved in linking each information source to specific VC(s) and articulate the process, with realistic timelines, by which the data provided in the information source will be analyzed to assess impacts on VC(s). For example:

- The workplan should include a stepwise process, with timelines, by which waterfowl and shorebird counts (summarized in the annual EPRs) will be analyzed to assess impacts of past and current operations and potential impacts of Bruce C expansion. Similarly, the workplan should include a process demonstrating how data from ongoing road mortality surveys (and other sources, if planned) will be analyzed to determine past/current impacts of nuclearization on local herpetofauna populations (including species at risk) and assessment of potential future impacts associated with Bruce C in the Project Study Area, LSA and RSA.
 - The workplan needs to identify the type and method of application of conceptual or numerical models used to characterize the existing hydrogeological, hydrological and atmospheric pathways, linkages between these pathways and linkages to receptors (abiotic and biotic). The workplan needs to provide the methodology that assesses the changes to physical quantity and quality (water and air) within these pathways and the impacts and significance on the respective receptors.
4. Indicators, metrics, thresholds, etc. for each VC
- o The workplan needs to present the process by which the specific indicators, metrics, thresholds, etc., for each VC will be used to assess the impacts of Bruce C (as well as cumulative effects), and realistic timelines for such assessment. For example, to understand the potential impacts of Bruce C on the Snapping Turtle population (a species of Special Concern federally and provincially, and a culturally-important Anishinaabe clan animal), a process should be identified in the workplan to determine the approximate Snapping Turtle populations in the three study areas (project, local, regional) at an appropriate baseline (e.g., 1970, prior to nuclearization), the current population, and the anticipated population impacts should Bruce C proceed. The assessment should be able to predict impacts without and with appropriate mitigations, as well as the monitoring approach(es), including indicators, measures and thresholds, that will be used to determine whether mitigations are working or if adaptive management is required.

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5. The criteria and methods to be used to determine the significance of effects
 - o The workplan needs to present a clear, logical process (with realistic timelines) by which appropriate criteria, methods and thresholds) will be used to determine the significance of adverse effects (including cumulative effects) on relevant VCs, and by which these determinations will inform decisions about project design, mitigation, offsets, and whether effects are acceptable.