



The Joint Chiefs and Councils
of the Saugeen Ojibway Nation

March 9, 2026

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

Keely McCavitt
Policy Officer, Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission

Dear Mr. Shuter and Ms. McCavitt:

Re: Impact Assessment Process for the Bruce C Project

We write further to the meeting held on February 13, 2026, between our teams concerning the impact assessment process for the Bruce C Project (“Project”). As was made clear during that meeting, the Saugeen Ojibway Nation (“SON”) remains deeply concerned about the credibility of the impact assessment process for this Project.

Since the Project was first announced, SON has consistently underscored the importance of SON and IAAC working together as true partners on the assessment of Bruce Power’s proposal. SON has been clear that we are willing to consider the proposal with open minds, but that the Project must be studied carefully and comprehensively given the significant impacts that the Bruce facility has already had on our Territory and our People, and our concerns that an expansion of the facility could further intensify those impacts. We stressed the need to collaboratively design a credible and robust assessment process—one that meets both IAAC’s and SON’s requirements. We explained that such a process is critical to generating the information necessary for SON and IAAC, as partners, to make a fair and fully informed decision as to whether the Project’s potential impacts can be adequately addressed and whether SON can ultimately support the Project.

Following assurances from IAAC that it had the necessary tools to allow for this partnership, SON worked diligently to advance a draft relationship agreement that would establish the foundation for our collaboration on project assessments within SON Territory, including the assessment of the Project. In order to finalize this relationship agreement before the assessment process proceeded, SON asked Bruce Power not to initiate the assessment. Once it was initiated over SON’s objections, SON requested that Bruce Power ask for a suspension of the time limit for the planning phase of the assessment process. This request was directed at Bruce Power based on IAAC’s representations to SON that IAAC’s ability to

affect timelines under the *Impact Assessment Act* was limited, and that this discretion rested with Bruce Power.

Unfortunately, efforts to advance the relationship agreement were repeatedly frustrated, and Bruce Power never agreed to suspend the impact assessment process for long enough for real progress to be made.

Then, in August 2025, without SON's knowledge or involvement, IAAC and CNSC entered into a "project charter" with Bruce Power. As you are aware, the project charter outlines how the Project could be assessed within a three-year timeframe. Said another way, and contrary to IAAC's prior representations, IAAC and CNSC negotiated a project charter that not only affects timelines, but further compresses the phases of the assessment beyond what the legislation requires to "support an expedited assessment timeline."

The resumption—and subsequent acceleration—of the assessment timeline, combined with SON's exclusion from strategic, high-level decisions relating to the design of the review process, has fundamentally undermined the credibility of the assessment process. The process significantly compromises SON's ability to assess and make decisions respecting Bruce Power's proposal. It also fails to ensure that the Crown's constitutional obligations to SON will be discharged, let alone provide the basis to ensure SON's free, prior and informed consent is obtained. Viewed in its entirety, SON is left with very little confidence in the impact assessment.

For decades, SON has been excluded from decisions that have had devastating impacts on SON Territory and People, including the decision to construct the Bruce facility. The Project marks the first new nuclear development in which SON—as a self-determining and self-governing Nation—could exercise our right to fully participate in decisions that affect our rights and Territory, consistent with the nation-to-nation relationship that exists between us. We expected that history would not repeat itself. To our disappointment, the actions of IAAC, CNSC, and Bruce Power to date have once again excluded SON's voice.

During our February 13, 2026, meeting, IAAC attempted to reassure SON that safeguards exist within the assessment process where the information generated by Bruce Power proves insufficient, including the possibility of pauses in the assessment processes and opportunities for SON to provide input. In light of the history described above—particularly the unilateral decisions that have shaped the assessment to date—these general assurances offer SON little comfort. Without clear, concrete commitments, SON cannot rely on the existence of discretionary mechanisms that may or may not be used in practice. SON requires more than verbal reassurances; we require a transparent, jointly understood framework that ensures our concerns will be acted upon and addressed, rather than being acknowledged but ultimately disregarded.

SON needs to understand precisely how IAAC intends to respond to our concerns about the proposed timelines and the fundamental inadequacy of the studies and analysis that we expect Bruce Power will provide. SON requires information from IAAC on the specific processes it will use to identify, address, and remedy deficiencies in the Impact Statement and how SON, IAAC, and CNSC will work together throughout those processes. SON must be assured that our concerns will not simply be noted but will

trigger concrete actions—such as requiring additional studies, extending timelines, or pausing the assessment where necessary. Clarity and predictability in this regard are critical. SON can no longer proceed on the basis of vague assurances that IAAC and CNSC have the tools necessary to deal with inadequacies. We need to arrive at a shared understanding of the processes that we will use together to ensure a credible assessment is carried out, and we must act quickly to document this understanding in the form of an agreement between us.

Likewise, statements by IAAC representatives suggesting that the Project could proceed regardless of whether consensus is achieved falls far short of respecting SON’s right to free, prior and informed consent (“FPIC”). Respecting SON’s FPIC requires a real and substantive possibility that the Project will not proceed where SON membership cannot accept potential impacts, even after good-faith efforts to address those concerns. Absent this possibility, IAAC’s acknowledgment of SON’s right to FPIC consent rings hollow. During the meeting, IAAC representatives indicated that they lacked the authority to make commitments to respecting SON’s FPIC. However, as we conveyed, IAAC representatives must take those steps within their authority to respect SON’s FPIC and must work with SON to seek the necessary commitments outside their authority from political leadership.

We look forward to your response and to our next meeting during which we expect to continue our discussions on these critical issues.

Miigwetch,

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Lester Anoquot
Saugeen First Nation

Paul Jones
Chippewas of Nawash Unceded First Nation