

Owen Tanner  
Energy Manager  
Saugeen Ojibway Nation Environment Office  
010129 Highway 6  
Georgian Bluffs, ON  
N0H 2T0

Dear Mr. Tanner,

**Re: SON's March 6, 2026 Letter "Work Required for Bruce Power's Workplan for Bruce C"**

We write in respect to your letter, dated March 6, 2026, regarding the Saugeen Ojibway Nation (SON) Technical Team's, including SON's Subject Matter Experts (Technical Team) concerns regarding the Draft Impact Statement Phase Workplan (draft Workplan) and the Impact Statement Schedule for the proposed Bruce C Project (Project).

We wish to clarify the purpose of the draft Workplan shared with SON (provided in Appendix A). The objective of the draft Workplan was to pull together technical information and discussions that had been shared over the past several months by SON and Bruce Power into one document. The draft Workplan was prepared with the objective of being a consolidated planning tool to support a mutual understanding of key milestones and activities during the Impact Statement phase of the Project. The level of detail SON is requesting is what would typically be developed through collaborative Technical Team meetings as part of the development of the Impact Statement and Licence to Prepare Site (LTPS) application. It is, and has always been, Bruce Power's intention to further develop the draft Workplan collaboratively with SON and its Technical Team and to use the Workplan as a roadmap to guide the work required to develop the Impact Statement and LTPS application. We would envision meeting regularly with your Technical Team to incorporate SON feedback into the Workplan and then ultimately working collaboratively on the content of the draft Impact Statement and LTPS application sections. The draft Workplan was provided to you as a starting point for that collaboration.

Bruce Power acknowledges that SON has voiced concerns about the Impact Assessment process timelines proposed in the Bruce C Project Charter. The Project Charter stated that Bruce Power will consider additional time to complete the Impact Assessment process, where reasonable, to support meaningful engagement with SON. A critical element in considering refinements to the Project schedule is an understanding of SON's intention to conduct any SON led assessments, and any SON Knowledge to be shared, including when this information would be available and how SON would prefer to be engaged. To support this discussion, Bruce Power shared a detailed weekly Impact Statement phase schedule in November 2025 to facilitate dialogue on how SON wishes to participate in the Impact Statement phase. The feedback from SON could then be used to refine the Impact Statement phase schedule. The inability of Bruce Power to schedule meetings with SON's Technical Team seems to suggest that SON is declining to participate in this important process, and we believe this is a missed opportunity to understand and incorporate SON Knowledge and feedback into the technical components particularly the cooling strategy of the Impact Statement and LTPS application.

In the absence of opportunities to advance these discussions collaboratively, and consistent with Bruce Power's commitment to consider reasonable schedule adjustments to support SON engagement, Bruce Power is delaying the submission of the Impact Statement and LTPS application to November 27, 2026. This adjustment is intended to preserve flexibility and to allow time for renewed engagement and we hope SON will take this opportunity to re-engage SON's Technical Team which is a critical component to the development of the Impact Statement and LTPS application.

Bruce Power appreciates the extensive comments SON provided on the Bruce C Tailored Impact Statement Guidelines (TISG). We are committed to working collaboratively with SON to address all TISG comments prior to the submission of the Impact Statement and LTPS application. Out of respect for your expertise, we believe that process would be better served by meeting with your Technical Team to ensure we understand the issues and have the requisite SON Knowledge to be able to complete our review and response to the TISG comments. For example, SON's TISG Comment, "*Use SON knowledge to understand the impact of Bruce Nuclear on the fishery, and on safety of consuming these fishes.*" In order for Bruce Power to respond to this comment and refine the Project Schedule, Bruce Power needs to understand what SON Knowledge will be provided, when it will be provided, and how SON wishes for the information provided to be included and considered in the Impact Statement.

Bruce Power continues to value the work completed with SON to date and remains committed to reestablishing regular engagement with SON and your Technical Team. We believe that renewed dialogue, focused on shared understanding of expectations, roles, and timing, would benefit both parties and strengthen the Impact Assessment process.

Sincerely,

<Original signed by>

Kalena Lair, Program Manager, Regulatory Affairs, Bruce C

<Original signed by>

Joanna Moffat, Technical and Administrative Lead, Indigenous Engagement & Partnerships

**APPENDIX A: Draft Impact Statement Phase Workplan**

**From:** [Kalena Lair \[Regulatory, Environment and Sustainability\]](#)  
**To:** <personal info>  
**Cc:** <personal information removed> [Joanna Moffat \[Environment, Sustainability & Net Zero\]](#)  
**Subject:** RE: Updated Impact Statement Phase Schedule  
**Date:** Friday, February 13, 2026 2:27:00 PM  
**Attachments:** [image001.png](#)

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Hi Emily,

To follow-up to the below email and feedback previously provided on the SON workplan, we have uploaded the updated draft Bruce Power SON Impact Statement Phase Workplan for collaboration ([Saugeen Ojibway Nation – Information Sharing - Firmex](#)). The objective of this draft is to pull together information/discussions that have been shared over the past several months by SON and Bruce Power into one document. We welcome any feedback you have on the document.

The draft has been prepared with the objective of being a consolidated planning tool to support an understanding of key milestones and activities during the Impact Statement phase of the Project. This workplan includes:

- Timeline: Impact Statement phase timeline
- SON TISG Comments: Process to address all comments received from SON on the Bruce C TISG
- Impact Statement Methodology: Methodology to be utilized in the development of the Impact Statement and LTPS application
- IAAC Impact Statement Phase Preliminary Workplan: high-level workplan identifying proposed interim submissions and technical workshops for the Impact Statement
- Meetings: proposed meetings, meeting objectives and cadence

Hope you have a nice weekend,  
Kalena

**Bruce Power and Saugeen Ojibway Nation  
Bruce C Project - Impact Statement Phase Workplan**

***DRAFT***

*Preliminary Draft Shared with SON for Collaboration*

**DRAFT**

BRUCE C PROJECT – BRUCE POWER AND SAUGEEN OJIBWAY NATION IMPACT  
STATEMENT PHASE WORKPLAN

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**BRUCE C PROJECT – BRUCE POWER AND SAUGEEN OJIBWAY NATION IMPACT STATEMENT PHASE WORKPLAN**

**ABBREVIATIONS**

<b>Abbreviation</b>	<b>Definition</b>
Bruce C TISG	Bruce C Integrated Tailored Impact Statement Guidelines
CNSC	Canadian Nuclear Safety Commission
EO	SON Environment Office
IAAC	Impact Assessment Agency of Canada
IC	Intermediate Component
LTPS	Licence to Prepare Site
MWe	Megawatts electric
PPE	Plant Parameter Envelope
SON	Saugeen Ojibway Nation
SMEs	Subject Matter Experts
VC	Valued Component
Workplan	Bruce Power and Saugeen Ojibway Nation Impact Statement Phase Workplan

**BRUCE C PROJECT – BRUCE POWER AND SAUGEEN OJIBWAY NATION IMPACT STATEMENT PHASE WORKPLAN****1.0 INTRODUCTION**

Bruce Power is evaluating the feasibility of expanding its nuclear fleet, to create an option for future electricity planning. The Bruce C Project (Project) will evaluate the impact of adding up to 4,800 megawatts electric (MWe) of nuclear capacity on the existing Bruce Power site.

Major nuclear projects are subject to an integrated impact assessment led by the Impact Assessment Agency of Canada (IAAC) alongside the Canadian Nuclear Safety Commission (CNSC), the nuclear lifecycle regulator. An impact assessment is a phased planning process which involves Indigenous, municipal and public engagement, environmental, health, and socioeconomic studies.

Bruce Power recognizes that the Bruce Power site is located within the Saugeen Ojibway Nation (SON) Territory, the shared treaty and traditional Territory of the Chippewas of Saugeen First Nation and Chippewas of Nawash Unceded First Nation (Neyaashiingmiing). Bruce Power is dedicated to honouring Indigenous history and culture and is committed to moving forward in the spirit of reconciliation and respect with the Indigenous Nations and Communities we work with.

The IAAC issued the Notice of Commencement of an Impact Assessment for the Project on August 19, 2025, along with issuing the Integrated Tailored Impact Statement Guidelines (Bruce C TISG). The Bruce C TISG outlines the requirements Bruce Power must meet in the Impact Statement and Licence to Prepare Site (LTPS) application which is prepared by Bruce Power during the Impact Statement phase of the impact assessment process.

**2.0 PURPOSE**

The following Bruce Power and SON Bruce C Project Impact Statement Phase Workplan (workplan) has been collaboratively developed by Bruce Power and SON as a planning tool to support an understanding of key milestones and activities during the Impact Statement phase of the Project. This workplan includes the following:

- Timeline: Impact Statement phase timeline
- SON TISG Comments: Process to address all comments received from SON on the Bruce C TISG
- Impact Statement Methodology: Methodology to be utilized in the development of the Impact Statement and LTPS application
- IAAC Impact Statement Phase Preliminary Workplan: high-level workplan identifying proposed interim submissions and technical workshops for the Impact Statement phase

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- Meetings:
  - SON Environment Office and Bruce Power IA Team Weekly Meetings
  - Technical Subject Matter Expert Meetings: Meeting cadence between Bruce Power and SON Subject Matter Experts (SMEs) and objectives of the meetings
  - Technical IAAC and CNSC Meetings: Technical meetings on key topics with federal and provincial experts

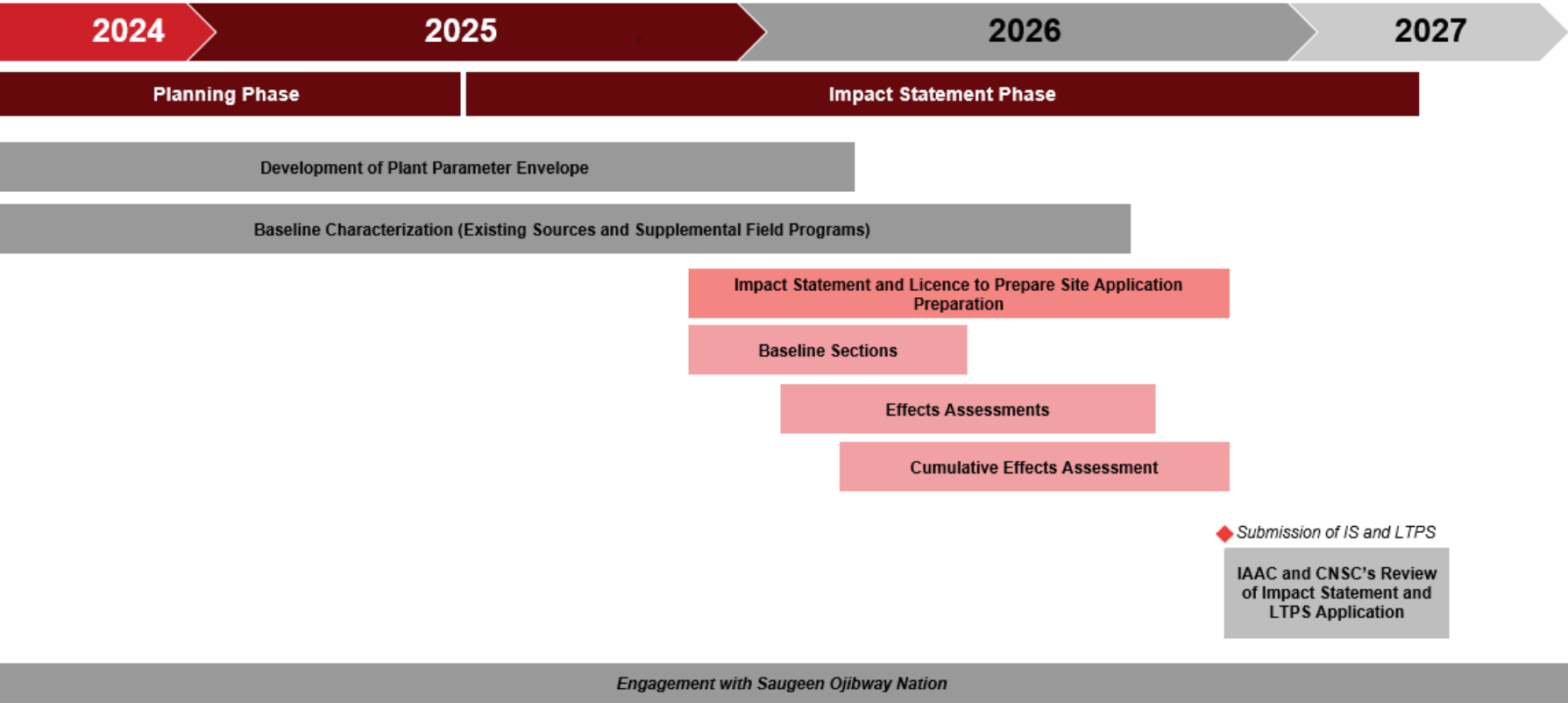
This workplan is considered a living document and will be revisited throughout the Impact Statement phase by Bruce Power and SON to determine if updates are required.

### 3.0 TIMELINE

The following figure provides a high-level overview of the Impact Statement phase schedule based on methodology further discussed in Section 5 below.

A weekly schedule breakdown of the Impact Statement phase was provided to SON in November 2025, and is provided in Appendix A. The Impact Statement phase schedule will be updated on a bi-weekly basis and shared to the Firmex Site: [Saugeen Ojibway Nation – Information Sharing - Firmex](#)

# High-Level Impact Statement Schedule Overview



**BRUCE C PROJECT – BRUCE POWER AND SAUGEEN OJIBWAY NATION IMPACT STATEMENT PHASE WORKPLAN**

The weekly schedule provided in Appendix A is broken down by each section of the Impact Statement and LTPS application. A color-coded legend is provided with the schedule.

This schedule has been aligned with the Bruce C Project Charter, with submission of the Impact Statement and LTPS application to IAAC and CNSC in August 2026. This is a preliminary schedule Bruce Power would like to further engage with SON on. In order to refine the schedule, engagement is required by Bruce Power and SON to understand:

- Level of SON involvement and collaboration on sections of the Impact Statement and LTPS application;
- Information on SON-led assessments or Indigenous Knowledge SON would like to share as part of the Impact Statement phase; and
- Establishment of SON engagement timelines including feedback on sequencing of sections and timeline allocated for engagement on each of the sections.

#### **4.0 SON TISG COMMENTS**

As discussed above, the Bruce C TISG were issued in August 2025 and outlines the requirements Bruce Power must meet in the Impact Statement and LTPS application. As outlined in Section 6 of the Bruce C TISG, SON, “will be submitting additional comments on the Integrated Guidelines. The proponent is expected to address all comments from SON related to effects of the project and impacts on their rights and interests in the development of the Impact Statement. The proponent is required to provide rationale for not addressing specific comments”. The TISG comments from SON were received by Bruce Power and posted to the Canadian Impact Assessment Registry on November 3, 2025.

Bruce Power has been reviewing SON’s TISG comments and is developing preliminary responses to support engagement with SON. SON’s comments on the Bruce C TISG are proposed to be discussed as part of the weekly SON Bruce Power meetings and SON Bruce Power SME meetings described below in Section 7.0. Bruce Power will document how SON’s TISG comments were addressed in the Impact Statement as part of a concordance table following engagement with SON.

#### **5.0 IMPACT STATEMENT METHODOLOGY**

##### **5.1 Information Provided to Date**

The “Saugeen Ojibway Nation Information Sharing Firmex Site” has been used as a platform to share all documents for engagement: [Saugeen Ojibway Nation – Information Sharing - Firmex](#)

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Table 1 provides an overview of the information that has been shared to date (2025 to present). Documents will continue to be uploaded and shared to the applicable folders as the Project progresses. Table 1 provides the following:

- Folder Section Number;
- Folder Title and Link to Firmex; and
- Content of Each Folder.

Following review of SON's TISG comment regarding baseline data (TISG Comment #7), in November 2025 Bruce Power provided a baseline data table document that outlines sources of data Bruce Power intends to use for the Impact Statement, including existing Bruce Power information, sources of other existing data, as well as information on field programs / studies that have been advanced to support baseline / existing conditions characterization. This baseline data table has been saved in the Firmex Site ([Saugeen Ojibway Nation – Information Sharing - Firmex](#)) and is provided as Appendix B. The baseline data table is a living/working list of resources that will continue to be updated through engagement with SON SMEs and as the technical leads continue to draft the Impact Statement sections. To resolve TISG Comment #7, Bruce Power would like to engage further with SON SMEs on the sources of baseline information during the proposed meetings outlined below in Section 7. Engagement on this information is foundational to the development of the Impact Statement and LTPS application, and also helps to understand overall schedule.

Bruce Power has also provided information to SON including preliminary alternative means criteria and indicators and preliminary valued components and spatial boundaries. Bruce Power would like to engage further with SON on these aspects as they are foundational to the development of the Impact Statement. This is further discussed below in Section 5.2.

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**Table 1: Firmex – Structure Overview and Information Shared To Date**

*(note additional folder content will continue to be added as the Project progresses, the table serves as an overview of existing files shared and a roadmap of the Firmex Site)*

Folder Number	Folder Title (Link on Firmex)	Folder Contents
1	Existing Environment & Regulatory Documents  <a href="https://brucepower.firmex.com/projects/3018/documents?folderId=97">https://brucepower.firmex.com/projects/3018/documents?folderId=97</a>	<ul style="list-style-type: none"> <li>1.1. Environmental Monitoring Methodologies               <ul style="list-style-type: none"> <li>1.1.1. Baseline Impact Assessment References</li> <li>1.1.2. Biological Effects Monitoring</li> <li>1.1.3. Conventional Air Monitoring</li> <li>1.1.4. Fish</li> <li>1.1.5. Groundwater Monitoring</li> <li>1.1.6. Radiological Monitoring</li> <li>1.1.7. Water</li> </ul> </li> <li>1.2. Environmental Assessment Reports (risk, studies, impact, TSDs etc.)</li> <li>1.3. Environmental Protection Reports (EPRs)</li> <li>1.4. Fisheries Act Authorizations</li> <li>1.5. Annual Five Year Look Ahead Letters</li> <li>1.6. Quarterly Environmental Summary Reports               <ul style="list-style-type: none"> <li>1.6.1. Q3 2024 SON Quarterly Report Response References</li> </ul> </li> <li>1.7. Relationship Documents</li> <li>1.8. Sustainability Reports</li> <li>1.9. Thermal Effluent Reports and Notifications</li> <li>1.10. Videos</li> <li>1.11. ECA Amendments</li> <li>1.12. Bruce Power Regulatory Documents               <ul style="list-style-type: none"> <li>1.12.1. FAA</li> <li>1.12.2. ECA</li> <li>1.12.3. PTTW</li> </ul> </li> <li>1.13. Existing Aquatic Information               <ul style="list-style-type: none"> <li>1.13.1. Impingement and Entrainment</li> <li>1.13.2. Thermal</li> <li>1.13.3. Shape Files_Habitat_Thermal LSA</li> <li>1.13.4. Other Reports</li> <li>1.13.5. Telemetry</li> </ul> </li> </ul>
2	Impact Assessment  <a href="https://brucepower.firmex.com/projects/3018/documents?folderId=34">https://brucepower.firmex.com/projects/3018/documents?folderId=34</a>	<ul style="list-style-type: none"> <li>2.1 Impact Statement Work Plan &amp; Schedule</li> <li>2.2 Bruce C Field Assessments               <ul style="list-style-type: none"> <li>2.2.1 Daily Field Reports</li> <li>2.2.2 Field Assessments</li> </ul> </li> <li>2.3 Initial Project Description</li> <li>2.4 Initial Project Description (IPD) Environment References               <ul style="list-style-type: none"> <li>2.4.1 Pre-2001 Reports</li> </ul> </li> <li>2.5 Summary of Issues</li> <li>2.6 Bruce Power's Response to Summary of Issues</li> <li>2.7 Integrated Tailored Impact Statement Guidelines</li> <li>2.8 Plant Parameter Envelope</li> </ul>

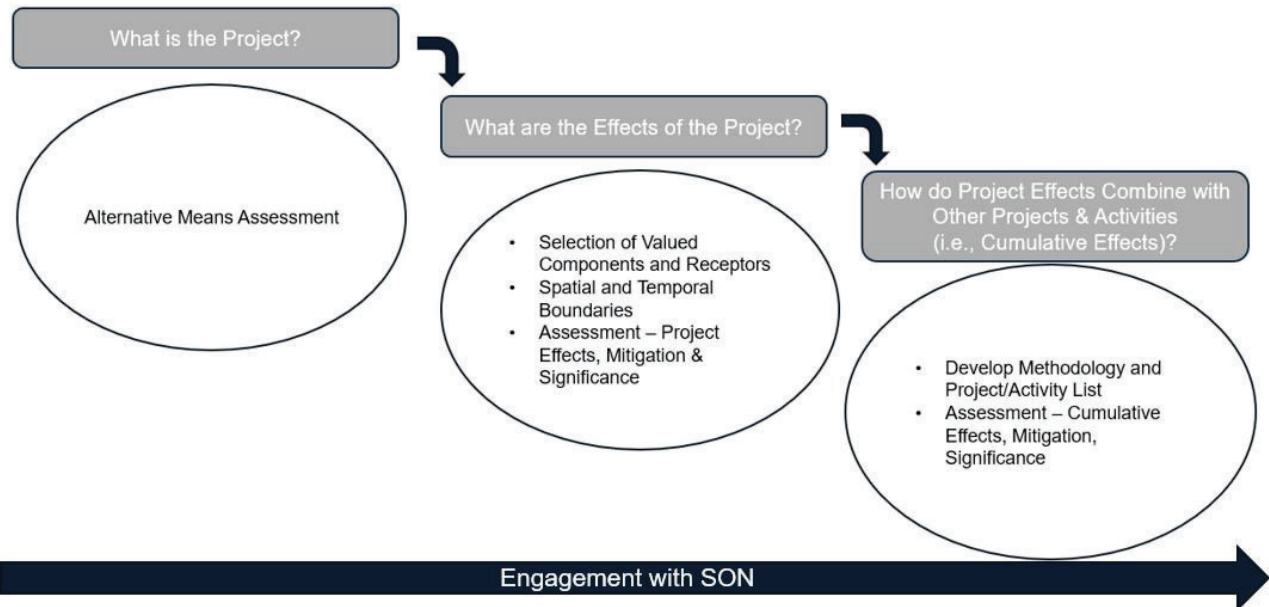
BRUCE C PROJECT – BRUCE POWER AND SAUGEEN OJIBWAY NATION IMPACT  
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Folder Number	Folder Title (Link on Firmex)	Folder Contents
		2.9 Impact Statement Sections 2.9.1 Introduction 2.9.2 Technical SME Areas 2.9.3 Project Description 2.9.4 Project Purpose, Need and Alternatives Considered 2.9.5 Assessment Methodology 2.9.6 Meteorological Environment 2.9.7 Geology, Geochemistry and Geological Hazards 2.9.8 Topography, Soil and Sediment 2.9.9 Ambient Radioactivity 2.9.10 Electromagnetism and Corona Discharge 2.9.11 Air Quality 2.9.12 Noise and Vibration 2.9.13 Light 2.9.14 Groundwater 2.9.15 Surface Water – Lake 2.9.16 Surface Water – Inland 2.9.17 Terrestrial, Riparian and Wetland Environments 2.9.18 Wildlife and Wildlife Habitat 2.9.19 Wildlife and Wildlife Habitat – Birds 2.9.20 Fish and fish Habitat 2.9.21 Health, Social and Economic 2.9.22 Indigenous Peoples 2.9.23 Security considerations 2.9.24 Accidents and Malfunctions 2.9.25 Effects of the Environment on the Project 2.9.26 Canada's Ability to Meet its Environmental Obligations 2.9.27 Sustainability 2.9.28 Follow-Up Programs and Adaptive Management 2.9.29 Assessment and Summary and Conclusions 2.10 Resources
3	Task Forces <a href="https://brucepower.firmex.com/projects/3018/documents?folderId=1282">https://brucepower.firmex.com/projects/3018/documents?folderId=1282</a>	3.1. Task Force 1 – Mitigation of Aquatic Impacts 3.2. Task Force 2 – Cooling Water Strategy 3.3. Task Force 3 – Socio-Economic
4	Coastal Waters Monitoring Program <a href="https://brucepower.firmex.com/projects/3018/documents?folderId=539">https://brucepower.firmex.com/projects/3018/documents?folderId=539</a>	4.1. CWMP Data
5	2025 Impingement Event Resources & Mitigation Measures <a href="https://brucepower.firmex.com/projects/3018/documents?folderId=331">https://brucepower.firmex.com/projects/3018/documents?folderId=331</a>	5.1. CNSC Impingement Event Submission August 2025 5.2. Mitigation Measures

## BRUCE C PROJECT – BRUCE POWER AND SAUGEEN OJIBWAY NATION IMPACT STATEMENT PHASE WORKPLAN

### 2.1 Methodology Section of Impact Statement

## Preparation of Impact Statement



Bruce Power is currently developing the draft Assessment Methodology section of the Impact Statement as per Section 7 of the Bruce C TISG. The draft Assessment Methodology section will be shared with SON for engagement. This section will include the methods for the following aspects of the Impact Statement:

- Describe how Indigenous Knowledge and Community Knowledge was collected and incorporated into the Impact Statement.
- Describe how climate change was considered as part of the Impact Statement.
- Define the Valued Components (VCs) and Intermediate Components, as well as the associated measurement indicators, for the biophysical, social, heritage, cultural, and economic aspects of the environment, including Indigenous Peoples that could be potentially affected by the Project.
- Define the spatial and temporal boundaries of the Impact Statement.
- Describe and, where possible, quantify the existing conditions to provide context for evaluating potential Project-specific effects and cumulative effects from existing conditions, the Project, and reasonably foreseeable projects and physical activities.

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- Identify where the Project may interact with the environment and identify and describe the potential effects of the Project. This step also includes the identification of mitigation measures that will avoid, eliminate, reduce, or control potential adverse effects, and enhancement measures to increase potential positive effects. After the application of mitigation measures, residual effects are identified.
- Characterize and tabulate residual effects using the following criteria: direction, magnitude, geographic extent, timing, duration, reversibility, frequency, and likelihood of occurrence to provide structure and comparability across VCs and intermediate components. Once residual effects are characterized, a significance determination for VCs is completed.
- Identify how the Project's residual effects may combine with the effects of reasonably foreseeable projects and physical activities to create cumulative effects and identify if additional mitigation measures are required to address these cumulative effects. Cumulative effects remaining after mitigation are also characterized and a significance determination for VCs is completed.
- Identify key bias and uncertainties in the Impact Statement and describe how these were addressed to achieve a precautionary assessment. Discuss the implications of the approaches used to address bias, uncertainties and the level of confidence in the residual effects analysis.

All environmental, health, social and economic disciplines will follow these methods and where required, discipline-specific tailoring will be presented in their respective sections of the Impact Statement (e.g., discipline-specific spatial boundaries). The detailed requirements for each discipline-specific assessment are outlined in the Bruce C TISG. For example, Section 8.7.1 of the Bruce C TISG requires the development of a 3-dimensional numerical geological model and outlines the requirements for that model. The details for this model will be included in the groundwater section of the Impact Statement and will be important topics to discuss with SON as part of the proposed Technical Bruce Power and SON Subject Matter Expert Meetings as described below in Section 7.2.

As noted in the weekly schedule provided in Appendix A, Bruce Power plans to provide the draft Assessment Methodology section to SON. Engagement with SON will be important to support the development of this section of the Impact Statement. Key areas of discussion include if there are SON-led assessments and an understanding of any Indigenous Knowledge SON wishes to share and how SON would like that information included in the Impact Statement. Early engagement on these topics will allow Bruce Power to develop an overall method through engagement with SON.

**BRUCE C PROJECT – BRUCE POWER AND SAUGEEN OJIBWAY NATION IMPACT STATEMENT PHASE WORKPLAN**

To support the development of the Impact Statement and LTPS application, engagement between SON and Bruce Power may include but not limited to the following:

- Provide feedback on existing Bruce Power baseline data or provide SON data;
- Share points of view on the Project's potential impacts on the exercise of rights and interests with Bruce Power to inform the Impact Statement (IEPP, 2025);
- Engage with Bruce Power to gather relevant information about the Project's adverse effects (direct and incidental) and discuss mitigation and monitoring measures to address possible adverse effects with Bruce Power to inform the Impact Statement (IEPP, 2025);
- Collaborate on the development of follow up monitoring program (if the project moves forward); and
- Establish approaches for addressing disagreements, in order to seek consensus throughout the development Impact Statement.

The above methodology is proposed to be engaged upon during the SON Bruce Power SME Workshops or through engagement with SON technical leads.

### **3 IAAC IMPACT STATEMENT PHASE PRELIMINARY WORKPLAN**

As per Section 1.4 of the Bruce C TISG, “the proponent is expected to provide IAAC and Canadian Nuclear Safety Commission (CNSC) a workplan for the Impact Statement phase of the integrated assessment, within 3 months of the Notice of Commencement”. Bruce Power provided IAAC with an Impact Statement Phase Preliminary Workplan in November 2025. The draft IAAC workplan document was provided to SON prior to submission. The high-level workplan identifying proposed interim submissions and technical workshops is provided in Appendix C. As noted in the document, Bruce Power considered the guidance provided in the IAAC's letter “Expectations for the Impact Statement Phase of the Bruce C Nuclear Project” (October 8, 2025, Guidance Letter). IAAC provided five options for early review. Bruce Power is proposing to do a combination of interim submissions and technical meetings, prior to submission of the Impact Statement and LTPS application. The IAAC workplan document is a living document and iterative updates will be provided to IAAC and CNSC as engagement with SON continues. Bruce Power will engage with SON on any subsequent updates of the IAAC workplan prior to submitting to IAAC and CNSC.

### **4 MEETINGS**

The following sections outline proposed meetings, meeting objectives and cadence throughout the Impact Statement phase.

**BRUCE C PROJECT – BRUCE POWER AND SAUGEEN OJIBWAY NATION IMPACT STATEMENT PHASE WORKPLAN****7.1 SON Environment Office and Bruce Power IA Weekly Meetings**

Weekly meetings between Bruce Power and SON's Environment Office will continue, with the objective to discuss Bruce Power's progress on the Impact Statement and LTPS application and to discuss SON's participation and engagement. These meetings support collaborative engagement to support the ability for SON to meaningfully participate in the development of the Impact Statement and LTPS application. Information for engagement, including Impact Statement and LTPS application sections will be uploaded to the Firmex Site and be provided to SON Environment Office Project Manager.

**7.2 Technical Subject Matter Expert Meetings**

Bruce Power and SON SMEs meetings will continue during the Impact Statement phase. The meetings may also be attended by the technical leads from WSP. The purpose of these meetings is to bring together the respective SMEs to discuss the technical details for their respective areas of the Impact Statement and LTPS application. Meeting objectives may include review of field program methodology and reports, discipline specific content will include but are not limited to valued components, spatial boundaries, baseline data sources, effects assessment methods (e.g., models), mitigation, cumulative effects, and SON's TISG comments. Cadence is proposed to be bi-weekly, and will be adjusted as needed.

**7.3 Technical IAAC and CNSC Meetings**

As outlined in the IAAC Guidance Letter (October 8, 2025), IAAC and CNSC can hold and coordinate proponent-led technical meetings on key issues with federal and provincial experts. A list of proposed preliminary topics for technical meetings has been included in Appendix D for further discussion with IAAC and CNSC.

The proposed intent of the technical meetings is to allow an opportunity for early familiarization of sections prior to submission of the Impact Statement and LTPS application to IAAC and CNSC. During these technical meetings, Bruce Power may share information on approach, key findings, etc; however, the drafting of these sections are not dependent on the technical meetings and will advance as outlined in the preliminary schedule.

SON will be invited to attend and participate in the technical IAAC and CNSC meetings.

**5 CONCLUSION**

This workplan has been developed collaboratively between Bruce Power and SON to provide an overview of the timeline, key milestones, and activities during the Impact Statement phase of the Bruce C Project. This workplan is considered a living document and will be reviewed together as the Impact Statement phase progresses.

**APPENDIX A: Impact Statement Phase Weekly Schedule**

*(Note: The Impact Statement phase schedule will be updated on a bi-weekly basis and shared to the Firmex Site, shown here as an example 11FEB2026 version)*

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**APPENDIX B: Baseline Data Table**

*(Note: The baseline data table is a living/working list of resources that will continue to be updated through engagement)*

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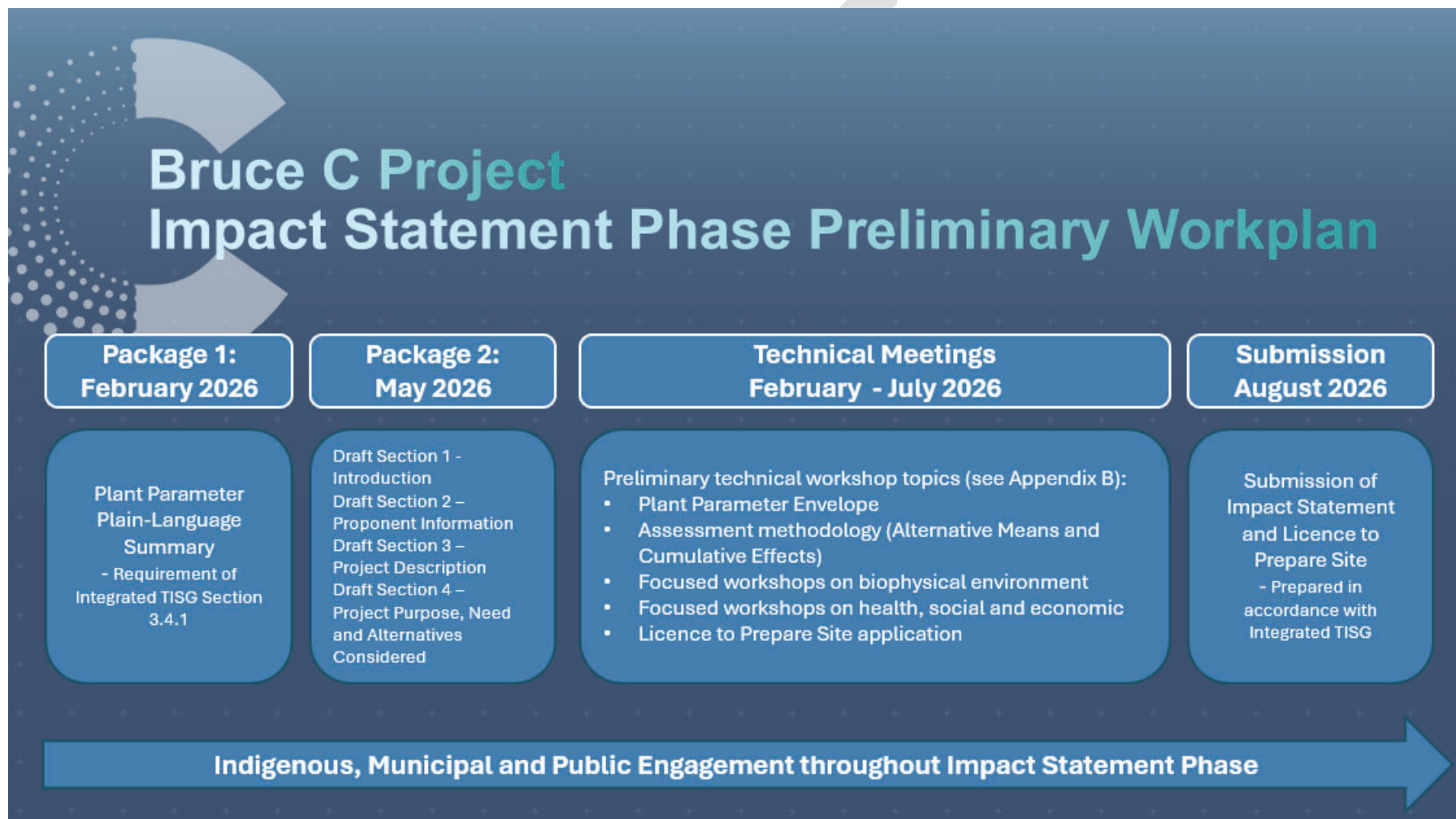
TISG Section Ref	TISG Section	Subsection	Sources of Existing Bruce Power Data (information being used to support trends are italicized)	Information being used to support PSA, LSA or RSA	Sources of Other Existing Data	Information being used to support PSA, LSA or RSA	Supplemental Baseline Field Programs/Studies (Completed Studies Identified in bold)	Information being used to support PSA, LSA or RSA	Research / Monitoring
	Introduction	1.1 Site Evaluation and site preparation for new nuclear reactor facilities 1.2 Factors to be considered in the integrated assessment 1.3 Gender-Based Analysis Plus 1.4 Response to the Impact Statement 1.5 Format and accessibility	Yes Yes Yes Yes Yes		Yes Yes Yes Yes Yes		Yes Yes Yes Yes Yes		
	Project Information	2.1 The project 2.2 Quantification of risks and preparation of the Impact Statement 2.3 Management actions for site preparation	Yes Yes Yes		Yes Yes Yes		Yes Yes Yes		
	Project Description	3.1 Project overview 3.2 Project location 3.3 Transition framework and the role of government 3.4 Project components and facilities 3.5 Schedule/implementation	Yes Yes Yes Yes Yes		Yes Yes Yes Yes Yes		Yes Yes Yes Yes Yes		
	Project Purpose, Need and Alternative Considered	4.1 Purpose of the project 4.2 Need for the project 4.3 Alternatives to the project 4.4 Alternative means of carrying out the project	Yes Yes Yes Yes		Yes Yes Yes Yes		Yes Yes Yes Yes		
	Description of Public Participation and Views	5.1 Summary of public engagement activities 5.2 Analysis and response to inquiries, comments, and issues raised	Yes Yes		Yes Yes		Yes Yes		
	Description of Engagement with Indigenous Nations and Communities	6.1 Indigenous knowledge considerations 6.2 Record of engagement 6.3 Issues identification and resolution 6.4 Collaboration with Indigenous Peoples following the submission of the Impact Statement	Yes Yes Yes Yes		Yes Yes Yes Yes		Yes Yes Yes Yes		
	Assessment Methodology	7.1 Uncertainty and bias 7.2 Exposure methodology 7.3 Selection of relevant components 7.4 Spatial and temporal boundaries 7.5 Effects assessment methodology 7.6 Mitigation and enhancement measures 7.7 Cumulative effects assessment 7.8 Effect to which adverse indirect effects are significant 7.9 General criteria for site evaluation	Yes Yes Yes Yes Yes Yes Yes Yes Yes		Yes Yes Yes Yes Yes Yes Yes Yes Yes		Yes Yes Yes Yes Yes Yes Yes Yes Yes		
	Biophysical Environment	8.1 Meteorological environment 8.2 Geology, geomorphology and geological hazards 8.3 Topography, soil and sediment	2022 EBA - Appendix A has 5 year data set. Max tower locations in Section 1.4, Table 5 8.1 - Annual met data information (2024 report, section 3.2.2, Appendix B) Changing Environmental Conditions Report - issued annually, includes internal and external data  2022 EBA - Appendix A, Section 1.5, Geology and Hydrogeology 2009 EA - TSD Geology and Hydrogeology 2009 Bruce A Refurbishment for Life Extension and Continued Operation Project EA - Geology, Hydrogeology and Seismicity TSD Bruce Heavy Water Plant Decommissioning - Environmental Assessment Study Report  2022 EBA - Appendix B, Section 2.3.5.1, Appendix C, Appendix E, Section 1.4, Appendix A, Section 1.5 Revised Site Facilities, Appendix A, Section 1.5, Area of Previous Environmental Investigation Appendix B, Section 2.1.3 and Appendix C, Identification of COPCs 2021 EPR - included in Section 1.5.5	N/A, Meteorology does not have a study area.  PSA, LSA and RSA  PSA, LSA	NES-GSDP future climate projections (future climate) NES-GSDP climate data (current climate) Regional Met Station Data from ECCC (current climate)  Heira Engineering Ltd. Descriptive Geophysics Model, OPG's Deep Geologic Repository, NWMO DGR-2011-24, March 2011  Banco Consulting Canada, Inc. and AECOM Canada Ltd. Three-Dimensional Geological Framework Model, OPG's Deep Geologic Repository, NWMO TR-2011-43, March 2011  BRI Worthington, Karst Assessment, Karst Assessment OPG's Deep Geologic Repository, NWMO DGR-2011-22, March 2011  Chapman, L. J., & Potham, D. F. (1984). The Physiography of Southern Ontario (3rd ed.). Toronto, Ontario: Ontario Geological Survey, Special Volume 2, Ontario Ministry of Natural Resources.  Ontario Geological Survey (1997). Quaternary Geology of Ontario (Digital Map, ERUS Data Set 14). Ontario Ministry of Northern Development and Mines, Scale 1:1,000,000.  Bedrock Geology of Ontario (Digital Map, ERUS Data Set). Ontario Ministry of Northern Development and Mines, Scale 1:250,000.  Sedler Associates Ltd. 2008. Geology and Hydrogeology Technical Support Document for the Bruce New Nuclear Power Plant Project Environmental Assessment, Version 1, May 2008.	PSA, LSA, RSA  PSA, LSA, RSA	Geotechnical, Hydrogeological and Environmental Sampling (Including Aggregate Testing, Bedrock Analysis) Basist Assessment (scheduled Fall 2025)  Soil sampling completed as part of the 2024 geotechnical field program Soil sampling proposed to be completed as part of fall 2025 groundwater monitoring field program	PSA, LSA  PSA, LSA	
	8.4 Ambient radioactivity	Dose to workers - see Radiation Protection Dose to humans and radioactivity in the environment - see 2022 EBA Section 1.0 and Appendix L Dose to non-human biota - see 2022 EBA Section 1.0 and Appendix N, 2022 EBA Section 4.1.1.1 and Appendix C Radiological monitoring - see 2024 Environmental Protection Report Section 6.1 and 2022 EBA Appendix L and N Bruce Power Radiological Environment Monitoring Program data	To be populated	Additional data sources are still being compiled and will be added in a later version of the work plan	To be populated		Effects of low dose radionuclide exposure research		



		10.1 Indigenous physical and cultural heritage, and structures, sites or things of significance	To be populated with collaboration with SON - Indigenous reports and/or survey data (where available and with permission) - TBD	N/A	To be populated with collaboration with SON			Stage 1 Terrestrial Archaeology Assessment Stage 2 Terrestrial Archaeology Assessment Stage 1 and 2 Terrestrial Archaeology Assessment (Electrical Field Program) Stage 1 and 2 Terrestrial Archaeology Assessment		
		10.2 Current use of lands and resources for traditional purposes	To be populated with collaboration with SON - Indigenous reports and/or survey data (where available and with permission) - TBD	TBD	To be populated with collaboration with SON			To be populated with collaboration with SON		
		10.3 Health, social and economic conditions of Indigenous Peoples	To be populated with collaboration with SON - Indigenous reports and/or survey data (where available and with permission) - TBD	TBD	To be populated with collaboration with SON			To be populated with collaboration with SON		
		10.4 Rights of Indigenous Peoples	To be populated with collaboration with SON - Indigenous reports and/or survey data (where available and with permission) - TBD	TBD	To be populated with collaboration with SON			To be populated with collaboration with SON		
		10.5 Mitigation and enhancement measures	To be populated with collaboration with SON - Indigenous reports and/or survey data (where available and with permission) - TBD	N/A	To be populated with collaboration with SON			To be populated with collaboration with SON		
		10.6 Characterization of residual impacts on Indigenous rights and interests	To be populated with collaboration with SON - Indigenous reports and/or survey data (where available and with permission) - TBD	N/A	To be populated with collaboration with SON			To be populated with collaboration with SON		
11	Security Considerations	11.1 Physical protection	To be populated		To be populated					
		11.2 Transportation routes	To be populated		To be populated					
12	Effects of Potential Accidents or Malfunctions	12.1 Risk assessment	To be populated		To be populated					
		12.2 Mitigation and enhancement measures	To be populated		To be populated					
		12.3 Emergency consequences	To be populated		To be populated					
13	Effects of the Environment on the Project	13.1 Meteorological hazards	2020 TM-0001-001, Final Exposure Memo B-380-EP-0001-001_3 Climate vulnerability Assessment Bruce A and B Regional Met Station Data - provided from ECCC 2022 EA - Appendix A has 5 year data set. Met tower locations in Section 3.4, Table 5 EP - annual met data information (DCM report, section 3.2.2, Appendix B) Changing Environmental Conditions Report - issued annually, includes internal and external data Internal and External Hazards - Bruce PSA External Hazard Assessment (Calian, 2024) High Wind Hazard PSA - Bruce A & B (Electricity, 2024)	PSA	NCA-GDDP Future climate projections (future climate) BRAS reanalysis data (current climate) Regional Met Station Data from ECCC (current climate) Nuclear Innovation Institute Annual Report, 2024 (The Climate Project: Global impact, local insights)	N/A	N/A	PSA		
		13.2 Surface water hazards	2028 EA - TSD 2022 EA - Appendix A, Appendix C, Section 3.4.5, Appendix E, Table 120 to Table 132, Section 3.8, Human Land Use and Appendix C, Section 3.3.7, Drinking Water, Section 3.4.4, Groundwater, Section 3.4.7, Drinking Water Recent report of water quality, current, and temperature data from Bruce Power's database Existing and future operational conditions for Bruce Power A and B 2023 EP - Section 3.1, Appendix E and Appendix F B-REP-07294-00003, Groundwater Monitoring Program Design Report Internal and External Hazards - Bruce PSA External Hazard Assessment (Calian, 2024)	PSA, LSA	NCA - lake bathymetry ECCC - offshore temperature data WSC/USGS - flow data for key tributaries Other disciplines (Internally) - GIS (e.g., land use) and meteorological data Conservation Authority - inland data (ongoing)	PSA, LSA	Shoreline Natural Hazard Assessment RSCP data in lake - ongoing LSA/PSA - for ADCP data in lake			
		13.3 Groundwater, geotechnical, geological and seismic hazards	Existing Bruce Power geotechnical, hydrogeological, topographic, soil quality and groundwater quality data Internal and External Hazards - Bruce PSA External Hazard Assessment (Calian, 2024)	Publicly available information of LSA and PSA. Information noted in Calian to the right for PSA as well as newly obtained data (if flow and level relevant)	To be populated					
		13.4 Biological hazards	Internal and External Hazards - Bruce PSA External Hazard Assessment (Calian, 2024)		To be populated					
		13.5 Fire and explosion hazards	Internal and External Hazards - Bruce PSA External Hazard Assessment (Calian, 2024)		To be populated					
14	Canada's Ability to Meet its Environmental Obligations	14.1 Environmental obligations	N/A							
		14.2 Climate change commitments	Annual sustainability reports (5 reports - one year each from 2021 to 2025 - data from 2020 to 2024) Scope 1 emission inventory for Bruce A and B (includes data from 2019, 2022, 2023, and 2024) Scope 1 emission inventory for Bruce A and B (data from 2019)	Not applicable. GHGs do not have a specific study area (the impacts are global).	National Inventory Report 1990-2023: Greenhouse Gas Sources and Sinks in Canada 2020 IPCC Guidelines for National Greenhouse Gas Inventories, Volume 4: Agriculture, Forestry and Other Land Use (Reference data - factors for calculations) ECCC's GHG Technical Guide related to the strategic assessment of climate change: guidance on quantification of net GHG emissions, impact on carbon sinks, mitigation measures, net zero plan and upstream GHG assessment (Reference data - factors for calculations)	Not applicable. GHGs do not have a specific study area (the impacts are global).	N/A	N/A		
15	Contaminants	15.1 Follow-up program components								
		15.2 Follow-up program components	July		July					
		15.3 Compliance monitoring	July		July					
		15.4 Regulatory management framework	July		July					
16	Equipment Summary		July		July					

BRUCE C PROJECT – IMPACT STATEMENT PHASE PRELIMINARY WORKPLAN

**APPENDIX C: Preliminary IAAC Work Plan Overview**



## BRUCE C PROJECT – IMPACT STATEMENT PHASE PRELIMINARY WORKPLAN

**APPENDIX D: Preliminary List of IAAC/CNSC Technical Meetings**

The following is a list of preliminary topics proposed for focused meetings with IAAC/CNSC throughout the Impact Statement phase.

Preliminary Topics	Description
Alternative Means Methodology	Discuss methodology for alternative means assessment
Cumulative Effects Assessment	Review methodology for assessment
Geochemistry and Geological Hazards	Focused meetings to discuss methodology, baseline characterization, and effects assessment
Atmospheric and Acoustic	Focused meetings to discuss methodology, baseline characterization, and effects assessment
Groundwater and Surface Water	Focused meetings to discuss methodology, baseline characterization, and effects assessment
Fish & Fish Habitat	Focused meetings to discuss methodology, baseline characterization, and effects assessment
Terrestrial & Species at Risk	Focused meetings to discuss methodology, baseline characterization, and effects assessment
Health, Social and Economic	Focused meetings to discuss methodology, baseline characterization, and effects assessment
Licence to Prepare Site Application	Focused meetings on Licence to Prepare Site application