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April 17, 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 our meetings of March 27, 2026, and April 15, 2026, to reiterate concerns we have raised in our meetings, to share a copy of the letter recently sent to Bruce Power, and to provide additional information on the independent work that the Saugeen Ojibway Nation (“SON”) has undertaken to date to identify gaps in Bruce Power’s existing information sources and conduct a preliminary assessment of the potential impacts of the proposed Bruce C Project (“Project”).

As you are aware, SON disagrees categorically with Bruce Power’s assertion that the Bruce site has been extensively studied and that sufficient data exists to support an expedited assessment process. SON has consistently raised our concerns to Bruce Power, IAAC, and CNSC that the existing data is incomplete. By way of illustration, SON has identified several fundamental deficiencies in the available information respecting the aquatic environment, as outlined in our letter to Bruce Power dated of April 10, 2026, enclosed.

To date, Bruce Power has failed to explain how it intends to generate the information necessary to support a scientifically defensible assessment of the Project’s impacts. Despite SON’s repeated requests, Bruce Power has not provided a detailed, forward-looking workplan to identify the studies Bruce Power proposes to undertake, their methodological design and evaluation framework, how identified information gaps will be addressed, how results will be integrated across interacting pathways, how uncertainty will be characterized and incorporated into conclusions, or how the proposed work could be completed within the stated timelines.

As you are aware, the SON Territory is already under significant stress. SON has long raised concerns that the Bruce facility has contributed, and continues to contribute, to the deterioration of Lake Huron. The fishery upon which the SON People have relied on since time immemorial, and to which SON holds an established Aboriginal right, is under severe and increasing stress and may be approaching a critical

threshold. SON remains deeply concerned that these waters cannot withstand another stressor. Even a relatively small stressor could have serious consequences for SON, let alone a stressor of the magnitude contemplated by the proposed Project.

In light of this fragility, SON has commissioned independent work to better assess the additional risks the Project might pose to an increasingly stressed ecosystem. This work includes an initial report prepared by Dr. Steven Cooke, founder of the Canadian Centre for Evidence-Based Conservation, examining tipping points in the context of aquatic life within the Lake Huron ecosystem of significance to SON.

Dr. Cooke's report approaches tipping points through both western and Indigenous knowledge perspectives. Focusing on three valuable indicator species—lake whitefish, gizzard shad, and bald eagle—found within SON Territory and reflective of the broader conditions of Lake Huron, the report assesses socio-ecological responses to additional pressures from large-scale industrial development, including the proposed Project. Dr. Cooke's preliminary findings indicate that certain indicator species clearly reflect an active tipping process, while others are trending toward a tipping point. Dr. Cooke emphasizes that further large-scale development, such as the Project, would cause additional ecological impacts, including reinforcing active tipping point exceedances and contributing to associated regime shifts.

These preliminary conclusions are consistent with, and reinforce, the concerns that SON has raised repeatedly with Bruce Power, IAAC, and CNSC. SON is now refining the scope of this work to continue to deepen our understanding of the fragility of the ecosystem and the Project's potential impacts on Lake Huron, the health of the aquatic environment, and SON People. However, the preliminary conclusions demand the adoption of a precautionary approach in considering any significant additional stressors, and that the Project and its potential impacts be carefully studied through rigorous studies before any decisions are reached.

SON remains committed to working alongside IAAC and CNSC to ensure that the Project is rigorously studied through a credible assessment process. We will continue to bring issues to IAAC and CNSC's attention as they are identified. SON notes that aquatic impacts are only one aspect of the Project requiring careful assessment, and that additional areas of concern—including socio-economic impacts and the implications of increasing the radioactive waste burden in SON Territory—must also be thoroughly examined.

As discussed in our recent meetings, it will be critical in the coming weeks to work together to determine how we will assess the sufficiency of information ultimately provided by Bruce Power and to work through issues. SON expects that Bruce Power will take the concerns we identified in our recent letter seriously, and develop a more robust program of study that will be capable of providing the Crown and SON with information required to support our decision-making on this significant Project. However, where significant gaps remain in the information produced, it will be necessary for SON, IAAC, and CNSC to work together to determine how those gaps will be identified and addressed, as both SON and the Crown must be able to rely on the assessment record to exercise their respective decision-making authorities. We look forward to our upcoming meeting in Ottawa and to subsequently detailing our agreements on these matters.

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<Original signed by>

Owen Tanner  
Energy Manager, SON Environment Office

Encl. Letter dated April 10, 2026, to Bruce Power re Bruce C Assessment