



Re: Comments on the Initial Project Description and Environmental Impact Assessment Registration for the Centre Village Renewables Integration and Grid Security Project - 89719

Submitted via email: CentreVillage@iaac-aeic.gc.ca

August 13, 2025

To whom it may concern:

Please find below and attached Sierra Club Canada Foundation's comments and supporting documents on the Project Description and Project Registration for the proposed 500 MW Centre Village Renewables Integration and Grid Security Project (a dual-fuel gas plant with diesel backup in Centre Village, Tantramar). The Sierra Club Canada Foundation (SCCF) is a national grassroots charity that empowers people to be leaders in protecting, restoring and enjoying healthy and safe ecosystems. The Sierra Club Canada Foundation (SCCF) includes four regional chapters: Atlantic, Québec, Ontario, and Prairie, plus the Sierra Youth Coalition, a group whose mandate is to empower young people to become community leaders.

It is clear that the proposed project will cause **significant, foreseeable, and inadequately mitigated harm** to the environment and the need for and alternatives to the project have not been adequately considered. As an organization committed to the rapid adoption of 100% clean energy solutions, protecting and restoring nature, and promoting energy democracy, we recommend the rejection of this project. If the project is not rejected at this stage, we recommend a full joint provincial-federal assessment of the project and / or a regional or strategic assessment as more appropriate methods to determine how best to meet increased and variable energy needs in New Brunswick for the next 25 years (which is the intended lifespan of the proposed project). Community-led engagement to develop local solutions that will meet anticipated energy needs while helping communities grappling with increased energy costs, energy insecurity, and accelerating climate impacts would almost certainly result in better solutions than the proposed project .

Below are our detailed comments and associated reference documents for our submission. Due to the lack of time allowed for consultation, we also note that a more complete review period would have enabled us to secure experts, evaluate the project description, and provide more information on our concerns and we continue to urge the Impact

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Half a Century of Change and a Future of Action/ Un demi-siècle de changement - et un avenir d'action !

Assessment Agency provide a longer timeline for experts and the public to engage with the assessment of this project.

Thank you for your consideration of these comments. Please get in touch if you require further information or clarifications.

Sincerely,

<original signed by>

Gretchen Fitzgerald
Executive Director

Overarching Comments

Climate Change and Local Energy Solutions

The international scientific community agrees that in order to reduce climate impacts, we need to switch off our reliance on fossil fuels and power up solutions such as energy efficiency, energy storage, renewable energy, and greater grid interconnectivity. Canada, as part of the international climate community, has committed to triple its renewable electricity generation and double energy efficiency capacity by 2030.¹

In Ontario, the Clean Air Alliance estimates that renewables and storage are half the cost of gas fired peaker plants.² The project description fails to provide adequate information to support the claim that this plant is needed or alternatives have been adequately assessed in light of the imperative to invest in these alternatives in order to stave off worsening climate impacts.

Because there is no legitimate commitment or mechanism proposed to reduce emissions from other power plants and / or sectors in conjunction with approving this project, the project will threaten Canada's federal emissions reduction commitments under the UNFCCC and national legislation. The absence of enforceable displacement measures undermines the integrity of national emissions inventories and compliance with Canada's 2030 targets and Clean Electricity Regulations.

Recommendation:

The project contravenes federal and provincial climate commitments and international scientific consensus of the need to stop investing in fossil fuel infrastructure in order to prevent worsening climate impacts and should be rejected.

The Wrong Proponent?

It is unclear as to why NB Power is not named as a proponent for this assessment. NB Power will ultimately decide when and how the plant will be used, and the NB Power grid will transmit electricity the plant generates. Most of the commitments made with regard to ghg emission reductions and statements with regard to the need for and alternatives to the project rely on actions, commitments, legislation and regulations that apply to the utility - not Watt Energy.

Information currently in the public sphere through the New Brunswick Energy & Utilities Review Board is insufficient for the public to evaluate NB Power's assessment both from an energy cost and emission reduction perspective - so without NB Power bringing this

¹ <https://www.iea.org/reports/renewables-2023/executive-summary>

² Going in the Wrong Direction. Ontario Clean Air Alliance. April 15, 2025.

"energy efficiency and renewables can keep our lights on at less than half the cost of new gas-fired peaker plants and new nuclear reactors." p. 12.

https://www.cleanairalliance.org/wp-content/uploads/2024/04/Going-in-the-Wrong-Direction-Report-apr-15-v_01.pdf

information to the assessment process, there is no way to adequately determine the impact of the project on climate, energy costs, and other potential energy solutions in the region.

NB Power will determine if, when, and how the plant is used once built. NB Power even owns most of the land on which the plant will be built. While NB Power and project proponents emphasize the reliability and grid-support functions of the RIGS project, the full cost implications to the public have not been disclosed or assessed in the documentation provided. Based on similar turbine installations, capital costs could easily exceed several hundred million dollars, not including fuel, maintenance, and transmission upgrades.

The ratepayer bears the long-term financial risk of this project. If the promised GHG reductions do not materialize—due to continued operation of legacy fossil plants—the public may face both environmental and economic losses. The tolling agreement and turbine procurement arrangements, believed to be associated with third-party developers, remain confidential, further limiting public oversight of future rate impacts.

In addition, NB Power's long-term financial outlook has been flagged as vulnerable by oversight agencies. This raises concern that the RIGS project could contribute to greater rate instability for residential, agricultural, and commercial users - and greater risk to the project.

Recommendation:

The Impact Assessment Agency should provide its reasoning as to why NB Power is not included as a proponent in this process, and identify the utility as a proponent.

The Wrong Time

As stated above, the project is inappropriate for the moment we face, in terms of the imperative for climate action, the need for increased energy security and to decrease the cost of living. We are also alarmed at the timing (mid-summer) and short time given to community members and experts to comment on this project. The plant, if built, will be one of the top emitters in the province, operate for 25 years, cost in the hundreds of millions to a billion of dollars to build, and is located in an area of great significance for wildlife and biodiversity, particularly migratory birds. The water consumption of the plant (4900 L /min) is significant. Moreover, committing to this plant for the next two and a half decades will stymie energy solutions that will benefit local communities and have fewer risks.

Recommendation:

We continue to ask that the Impact Assessment Agency increase the current comment period so that experts and members of the public have adequate time to evaluate the impacts of a project of this magnitude, and provide information on alternatives. We also contend that a project (or series of projects) with greater obvious environmental and societal benefits would not require the level of scrutiny this project requires, and would better serve the tight timeline of meeting changing electricity demand by 2028.

Need for and Alternatives to the Project

Recommendation:

An independent assessment of alternatives to the project should be provided. We support information provided by the Conservation Council of New Brunswick regarding other solutions to meet peaks in electricity demand without increasing reliance on fossil fuels.

Failure to Assess Life Cycle Emissions or Provide Details on GHG Emissions "Displaced"

The estimated ghg emissions from the project provides no information on the timing of the ramping down of other fossil fuel plants or efficiency measures that would reduce energy demand, so the contention that the plant will result in lower - not higher - ghg emissions lacks credibility. According to comments prepared by the New Brunswick Anti Shale Gas Alliance, the plant will become one of the top emitters in the province, and the impacts of these emissions - not mysterious reductions from other projects yet to be named - need to be assessed.

Recommendation:

A credible plan to ensure this plant aligns with federal Clean Electricity Regulations, as well as provincial and utility targets to be net zero by 2035 needs to be provided.

Wrong Place?

The Chignecto Isthmus is a critical corridor of incredible ecological, geological, cultural, and socio-économique significance - linking the provinces of Nova Scotia and New Brunswick. The region creates significant habitat for birds and other wildlife and is threatened by increasing climate impacts.

Water and Wetlands

There is no assessment of the impact of water drawdown (4,900 L / min) and discharge of effluent on surrounding wetlands and ecosystems adjacent to the plant. The study provided in the project description and registration document focuses on the needs of the plant, not the need to protect the environment, safe drinking water, and health.

In Section 19.3.1, the Proponent says that processed water is assumed to contain three times the raw groundwater concentration for minerals and salts, so the effluent water quality is anticipated to exceed the Government of Canada's water quality guidelines and the Canadian Ministers of Environment guidelines for nitrite, aluminum, arsenic, cadmium, copper, iron, lead, selenium, thallium, and zinc. It would be prudent for IAAC to withhold project determination until a much more comprehensive understanding of the impact to water and wetlands is submitted for review.

Recommendation:

The proponent should provide a comprehensive water management plan that includes analysis of the impacts of water draw down, estimates of water recharge rates, and impact of effluent discharge on water wells and adjacent ecosystems. The Atlantic region is currently experiencing drought and wildfires: in cases of water shortages or need for water for other needs, the

proponent should provide a contingency plan for where and how water will be brought to the plant.

Birds, Ecology, and Species At Risk

Given its proximity to the Tantramar Marshes, which form a critical component of the broader Chignecto area, an ecologically significant area containing multiple federally listed Species at Risk and habitat for migratory birds, this project has the potential to cause irreversible harm to critical habitats. The Tantramar Marshes and adjacent Tintamarre National Wildlife Area (NWA) are recognized for their biodiversity, ecological services, and cultural heritage. The federal government has both a legal and moral obligation to ensure any potential impacts are fully assessed before approvals are granted.

The Tantramar Marshes—integral to the larger Chignecto Isthmus ecological network—provide essential habitat for numerous SARA-listed bird species, including barn swallow, chimney swift, common nighthawk, eastern meadowlark, short-eared owl, and least bittern.

Non-avian species such as the American eel and monarch butterfly also occur here. The area's wetlands, uplands, and agricultural fields create a mosaic of habitats vital for breeding, migration stopovers, and year-round survival. According to the Tintamarre NWA management plan, the site supports substantial populations of waterfowl during spring and fall migration, including American black duck, green-winged teal, northern pintail, and Canada goose. Shorebirds, such as the greater yellowlegs and semipalmated sandpiper, use the area as a critical staging ground during long-distance migrations. The plan also notes occurrences of the endangered least bittern and important amphibian populations, highlighting the breadth of biodiversity reliant on this landscape. These multiple layers of ecological value mean that disturbance, noise, and light pollution from the proposed project could have wide-ranging, multi-species consequences.

The Tantramar Marshes, part of the broader Chignecto Isthmus ecological corridor, encompass approximately 1,960 hectares of wetlands, peatlands, and reclaimed tidal marshes, acting as an ecological bridge between New Brunswick and Nova Scotia. They are recognized for their high biodiversity, including important waterfowl staging areas. The marshes are already under pressure from climate change, sea-level rise, invasive species, and dyke deterioration. Any new industrial development could exacerbate these stresses, further threatening the ecological integrity of the region.

The Tintamarre National Wildlife Area, established in 1994, is managed by Environment and Climate Change Canada to protect critical habitats for migratory birds and species at risk. It contains a diversity of wetland types—freshwater impoundments, brackish marshes, and tidal wetlands—providing foraging, nesting, and staging areas for over 180 bird species recorded to date.

The management plan identifies conservation of wet grassland habitats, maintenance of dyked agricultural lands as surrogate breeding habitat, and control of invasive species as key priorities. The marshes also function as a significant carbon sink, storing carbon in peat and wetland soils, and they provide flood control and water filtration services that are

increasingly important in light of climate change impacts and sea-level rise. Industrial activity in proximity to this sensitive ecological complex risks undermining decades of federal and community-led conservation work.

The Tintamarre NWA management plan specifically identifies human development in surrounding areas—including residential, commercial, and industrial projects—as a significant 'challenge' to maintaining the ecological integrity of the NWA. These developments can cause habitat fragmentation, increase disturbance from noise and artificial light, and degrade water quality through runoff. The plan warns that such pressures from adjacent lands could compromise the conservation goals of the protected area and the broader Tantramar ecosystem.

The Isthmus of Chignecto is one of Atlantic Canada's most important ecological corridors, linking Nova Scotia to mainland Canada. The current EIA does not assess landscape-level connectivity impacts, a serious omission.

Under the Species at Risk Act and the Migratory Birds Convention Act, Canada is obligated to protect critical habitats for listed species. Federal Impact Assessment legislation requires the consideration of cumulative effects and potential harm to species at risk habitats when determining project approvals. Given the presence of multiple SARA-listed species and proximity to a National Wildlife Area, the project clearly meets the threshold for a full federal Impact Assessment.

The Tintamarre NWA is protected under the Canada Wildlife Act, which mandates the Minister of Environment and Climate Change to conserve wildlife and its habitat. Federal policy and the NWA management plan commit to maintaining the ecological character of the site in alignment with the Convention on Biological Diversity and Canada's international obligations under the Ramsar Convention for wetland protection. Any industrial project potentially affecting these lands or their connected habitats must undergo rigorous federal review to ensure compliance with these statutes and commitments.

Additionally, the field surveys are seasonal and incomplete, particularly with respect to avian migration patterns. Appendix G notes limited site-specific biodiversity data. The project's proximity to wetlands and riparian zones is under-addressed. Wetland alteration permits are flagged but not detailed, and light and noise pollution from 24/7 turbine operation could disrupt critical nocturnal behaviors and breeding cycles.

The RIGS facility will introduce around-the-clock light and noise from combustion turbines and infrastructure operations. These disturbances can displace nesting birds, interfere with foraging, and alter migration behaviours. The EIA has not sufficiently modeled these indirect yet significant pressures. Mitigation strategies must go beyond generic compliance and include site-specific operational curtailments, buffer expansion, and nocturnal impact reduction plans.

Recommendations:

This assessment must include detailed baseline ecological surveys, seasonal mapping of species use, cumulative effects analysis, assessment of loss of ecosystem services (water

filtration, CO2 sequestration, flood mitigation, etc.), and robust mitigation measures. No approvals should proceed until these studies are completed and subject to full public scrutiny.

At a minimum, IAAC should request that the proponent provide year-round baseline biodiversity studies, species-at-risk assessments, and a full analysis of habitat connectivity loss. IAAC should also require the proponent to include site-specific operational curtailments, buffer expansion, and nocturnal impact reduction plans that address light and noise disturbances.

We also recommend:

- the project proponent assess landscape-level connectivity impacts to the Chignecto Isthmus;
- an independent ecological assessment that includes local knowledge, focused on the Tintamarre NWA, modeling cumulative effects of light, noise, emissions, and habitat disturbance;
- the proponent develop and enforce a wildlife corridor and habitat connectivity plan across the Isthmus of Chignecto to mitigate fragmentation;
- establish an adaptive post-construction monitoring program, commit to publicly releasing data gathered through such a program, with defined mitigation triggers for avian displacement and habitat degradation;
- a comprehensive regional biodiversity study and corridor protection plan be completed *before* any decisions, so that the full scope of ecological impacts is understood. To do otherwise would contravene the precautionary principle and Canada's commitments under the [Species at Risk Act](#); and that
- IAAC require documented consultation and joint oversight with Environment and Climate Change Canada before any project approvals proceed.

Air Quality

The combustion turbines will emit nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), volatile organic compounds (VOCs), and fine particulate matter (PM_{2.5}) and discharge polluted water. Despite assertions of compliance with guidelines, the following issues are evident:

- The project is located near sensitive receptors, including residential areas and agricultural operations. Appendix H of the provincial EIA includes ambient air modeling but uses limited meteorological scenarios and underrepresents cumulative impacts.
- Additionally, the proponent has failed to include provisions specifically to NO₂ emissions, an oversight in the modeling of potential air pollution.
- PM_{2.5}, a key health risk, is estimated at 3.2 tonnes per year from the stack alone. This does not include secondary formation or ground-level contributions. Again, the modeling is incomplete, based on outdated air quality guidelines, and not the more recently approved guideline for 2030.
- Cumulative air quality assessments are inadequate and fail to consider existing regional pollution burdens.

Recommendation:

Require a full cumulative air quality impact assessment that includes all emission sources, meteorological variability, and sensitive receptors, including an assessment of the cumulative impacts of exposure to air pollution on workers at the plant.

Impact of Climate Change on the Project

The region where the project would be located is experiencing wildfires right now. In the future, we can anticipate greater risk of wildfires, floods, coastal erosion, unpredictable weather and water availability, and severe storms. All of these represent a risk to the plant, workers, and grid connectivity.

Recommendation:

The proponent should provide an assessment of the impacts of climate change on the plant, workers, and grid connectivity..

Accidents

The risk of an oil spill, gas leaks or blow and / or fire are not assessed.

Recommendation:

The risk of such accidents and accident preparedness should be laid out in the document. Resources needed to respond to such accidents need to be identified.

Detailed Comments of the Project Description & Registration

	Section	Project Description Text	Comment
Part A: General Information			
	1 - Project Name	Centre Village Renewables Integration and Grid Security Project	<p>Misinformation and greenwashing is one of the key methods the fossil fuel industry has delayed climate action for decades. Misrepresenting the project, which is a diesel-gas fired electricity plant, is misleading and perpetuates misinformation. (See attached UN Report: <i>Integrity Matters</i>).</p> <p>The Competition Bureau has created rules to confront greenwashing, which the proponent should review and re-name this project accordingly: https://competition-bureau.canada.ca/en/how-we-foster-competition/education-and-outreach/environmental-claims-and-greenwashing</p>
	2 - Proponent Name	WattBridge	<p>NB Power has identified the need for this project through assessing alternatives, and should be included as a proponent, n required to present this analysis as part of the assessment. NB Power will ultimately determine how often the plant is used, will provide and / or purchase land for the project site, and is involved in numerous regulatory and Integrated resource planning processes that will determine the alternatives to the project, scale and frequency of use of the proposed plant, and its cost to electricity ratepayers. This information will be crucial to assessing overall impacts of the project.</p>
Part B: Project Information			
	7.4 Need for the Project	<p>Studies have shown that using a dispatchable capacity resource, such as thermal generation fueled by natural gas (and/or low sulfur diesel) is a low-cost way to manage the impacts of this increased need for electricity (peaks in electrical load). With turbine units reaching full power within 10 minutes, the Project provides an ideal solution in fast response to the variability of renewable generation.</p>	<p>Proponents should provide the studies and assessments upon which this statement is based. Please see attached studies indicating that renewable energy, efficiency, storage and adopting a "Virtual Power Plants" approach can meet anticipated energy needs and create resiliency.</p>
	7.4 Need for the Project	<p>In addition, a dispatchable resource can be run infrequently to support peak demand, while complementing the intermittent availability of variable renewable energy resources like wind and solar. Combustion turbine</p>	<p>Please provide the source of this assertion that the diesel-gas plant is the most cost effective approach. Please find attached studies discussing the volatility of fossil fuel prices and impacts on energy costs and inflation (e.g.: - https://www.iisd.org/system/files/2024-07/fossil-fuels-drive-inflation-canada.pdf)</p>

		<p>technology, currently used in the province, and widely used for this application in support is required, and the energy is not.</p>	<p>In addition, increasing energy savings are not assessed: a recent examination of peak demand response measures by Efficiency Canada concluded that “no Canadian utility appears to be reaching the levels of peak demand reduction from demand-side measures that some utilities in the US are achieving”. Of the 36 utilities considered in the study, NB Power ranked thirty-third for the percentages of peak demand reductions from demand response programmes.</p>
	7.4 Need for the Project	Clean Energy Regulations	<p>The project does not explain how it will meet the targets laid out in the Clean Electricity Regulations and in NB Power's commitment to have a net zero electricity grid by 2035. The proponent should lay out exactly how and through what measures it will comply with the net zero by 2035 target.</p> <p>Should this project proceed, it would face regulations and / or become a stranded asset. The project description should lay out the consequences of and plan for such an outcome.</p>
	7.4 Need for the Project	<p>The Project represents a cost-effective, safe and reliable solution to enable renewable energy growth and advance sustainability goals while meeting growing electricity demands in the province. Project technology, which features natural gas-powered turbines and emission reduction systems, represents a critical intermediate step toward decarbonization, and displacing coal power. According to NB Power, the Project is expected to result in a net system reduction of CO2 emissions of up to 250,000 tonnes/year by 2030.</p>	<p>The proponent should provide greater detail on the emissions arising from the project (including a complete life cycle assessment that includes ghg emissions associated with transporting diesel and methane to the site) under a range of potential use scenarios, and how exactly the stated ghg reductions will occur. Which ghg emissions will be displaced? What plants will be ramped down or taken offline to accomplish this and what mechanisms exist to ensure this occurs?</p>

	9.1 Project Overview	The CTGs will have the capability to use both natural gas and ultra-low sulfur diesel (ULSD) to generate electricity. The primary fuel will be natural gas which will be delivered to the site via pipeline by a third party. ULSD, which will be delivered to the site by truck via a third party and stored in an onsite fuel storage tank, will be used as a backup fuel supply if needed.	Fossil fuel prices and availability can be extremely volatile, and could result in changes in the anticipated mixture of fuels used at the plant. Please indicate the range of use for the two anticipated fuel types: i.e. what if diesel is used 100% of the time versus methane, etc. What are the resulting ghg emissions, impact on truck traffic diesel transportation and storage (and risk of spills), and pipeline use and associated emissions under the possible range of conditions? Please indicate why the type of turbine has been selected, and offer cost-benefit analysis of alternative turbine technologies. We refer you to concerns submitted by the Conservation Council of New Brunswick regarding the inefficiency of the simple-cycle combustion turbines (~39-41% thermal efficiency) instead of modern high-efficiency combined-cycle units (can exceed 60% efficiency) .
	9.1 Project Overview	The operational lifetime is expected to be a minimum of 25 years	Renewable energy and energy storage solutions are evolving quickly both in terms of technological advances and decreasing cost. Please explain why a 25 year minimum lifespan is anticipated in light of these advances. Please provide a range of possible timelines for retiring the plant and resulting range of impacts for the plant and the alternative on energy costs, reliability, and ghg emissions.
	9.1 Project Overview	Prior to the end of its planned operational life, a decision will be made in consultation with NB Power whether to perform equipment upgrades to repower the Project and extend its operational lifetime or proceed with decommissioning. This decision will be informed by an updated integrated resource plan prepared by NB Power.	Given the need to phase out fossil fuels, there should be a commitment to decommission the plant, and details provided on decommissioning.
	9.3 Ancillary Infrastructure Outside Scope of Project		Proponent should describe additional truck traffic (for fuel, operations, and waste management), road infrastructure and pipeline connections required to transport diesel and gas to the plant. The ghg emissions and impacts of these activities should be included in the assessment.
Part C: Location and Context			
	14.6 Wildlife and Wildlife Habitat	Dedicated wildlife surveys were not conducted by Stantec in 2024, but incidental wildlife observations were noted during vegetation and wetland surveys.	Wildlife surveys would need to be conducted at the appropriate times to better understand impacts on birds and other wildlife. Additional buffer zones should be provided to protect nesting sites, particularly as the site may be the only nesting site for three bird species in NB. See overarching comments above.
Part E: Potential Effects of the Project			
	19.1 Air Quality		

	19.1.1 Potential Effects		The proponent should include the impact of removal of vegetation on carbon sequestration at the site as part of its calculations.
	19.3 Groundwater and Surface Water		
	19.3.1 Potential Effects	Studies are currently underway to evaluate proposed reject process water effluent discharge options, including discharge to a wetland 300 m west of the site or discharge to a ditch located along Route 940. The discharge of liquid effluents from Project operations could potentially result in changes to groundwater quality (e.g., through percolation of effluent to the water table), changes in surface water quality (e.g., discharge of contaminants), and changes in surface water quantity (e.g., increase in surface water flows). Depending on the location of the discharge and the presence of fish habitat, changes in surface water quality and quantity may also result in changes to fish and fish habitat (Section 19.4).	Impacts of groundwater quality and quantity are anticipated but little discussion of efforts to reduce water use and treat wastewater discharged from the plant are considered. As stated above, we recommend the proponent provide a comprehensive water management plan.
	19.7 Wildlife and Wildlife Habitat		Efforts to reduce light and noise pollution should be added to the mitigation measures proposed, as well as increasing buffer zones around important habitats and creation of a wildlife connectivity corridor.
	23.1 Greenhouse Gas Emissions	In 2023, the GHG emissions reported for New Brunswick and Canada were 11 million tonnes (Mt) CO ₂ e and 694 Mt CO ₂ e, respectively, as reported in Canada's NIR (ECCC 2025b), where 2023 represents the most recent year with this information. The Project's operation emissions shown in Table 23.5 are anticipated to represent 7.9% of New Brunswick's annual emissions and 0.1% of Canada's annual emissions.	The proponent should discuss impact on achieving provincial and federal ghg emission targets into the future, as well as provide information on the loss of carbon sequestration by destroying forests and wetlands on the site. As stated above, a full cycle analysis of transportation of fossil fuels, combustion, operation and decommissions and loss of carbon sinks, etc should be provided.

	23.2 Carbon Sinks		See above. Complete information is not provided on the estimated loss of carbon sequestration due to loss of forests and wetlands at the site.
	24.4 Light		<p>Reducing light pollution, seasonal changes in operations to accommodate nesting birds, and using different coloured lighting to reduce impacts on birds should be discussed.</p> <p>https://www.fws.gov/story/threats-birds-collisions-nighttime-lighting#:~:text=Color%20and%20Brightness&text=Avoid%20using%20blue%2C%20white%2C%20or.light%20as%20dim%20as%20possible.</p> <p>The proponent should provide more detail on lighting on stacks, and other infrastructure and how steps will be taken to reduce impacts on birds and wildlife.</p> <p>The proponent should describe if /when flaring could occur and means to impact wildlife and birds.</p>
	24.5 Liquid Effluent and Stormwater	<p>The RO and EDI processes involved in the raw water treatment system produce reject water containing the dissolved solids, impurities, and ions removed from the raw water. This reject water from both processes is a necessary byproduct to ensure the removal of contaminants and achieve the desired water purity. The reject stream from the systems is considered effluent and requires proper management and disposal. Reject process water from the water purification process will be approximately one-third of the volume of raw water intake with water quality composition approximately three times the concentration of the raw groundwater quality. As explained in Section 9.4.2, the operating time for the Project will vary and likewise, the volume of effluent discharge will vary greatly. The mean monthly flow of effluent discharge raw water intake with water quality composition approximately three times the concentration of the raw groundwater quality. As explained in Section 9.4.2, the operating</p>	<p>The proponent should provide total water intake (4,900 L/min) not just water used by the plant after being processed), amounts and quality of effluent produced under a variety of scenarios, and estimate impacts on groundwater levels, ecosystems (including fish and fish habitat and habitat for Species At Risk and migratory birds) and water quality once discharged into the environment.</p> <p>The impact of temperature changes (ie. will the water be warmer than the water source into which it will be dumped?) should also be described, and mitigation measures proposed to reduce impacts of fish and fish habitat.</p> <p>The number of trucks required to carry away the "reject stream" effluent and facility with capacity to process contaminants should be identified.</p> <p>Contingency plans to deal with potential lack of groundwater availability and droughts on the impact of effluent on ecosystems should be described.</p>

		time for the Project will vary and likewise, the volume of effluent discharge will vary greatly. The mean monthly flow of effluent discharge under a 7% net capacity factor scenario is 0.8 US gallons per minute (usgpm) (October) to 113 usgpm (January). Consistent with the increased operating time, the 17% net capacity factor scenario effluent flow range is higher at 2 usgpm (October) to 274 usgpm (January).	
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Appendix B

	Water Supply Source Assessment Initial Application	Preliminary designs estimate an average daily demand of approximately 4,900 litres per minute (L/min) (7,000 m ³ /day), which exceeds the trigger demand of 35 L/min (50 m ³ /day) for a Water Supply Source Assessment (WSSA) under the Environmental Impact Assessment (EIA) Regulation (NB Reg 87-83) of the New Brunswick Clean Environment Act (NBDELG 2025). The total number of wells required to meet this demand will not be known until a test program is completed.	The extent of this level of drawdown (2.8 Olympic sized swimming pools per day) on water table and adjacent water bodies and wetlands needs to be evaluated and water conservation and mitigation measures proposed. The proponent should indicate maximum water required per year, estimate recharge rates for groundwater, describe seasonal fluctuations in water use and discharge, describe measures that will be taken to stay within these projected amounts, and provide contingency plans for when this is not possible.
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Missing Sections

	Impact of Climate Change on the Project		
	Disaster and Accident Prevention and Response		

Additional Information & Research to Be Incorporated in the Project Assessment

Name of the Project

Integrity Matters: Net Zero Commitments by Businesses, Financial Institutions, Cities and Regions United Nations' High-Level Expert Group on the Net Zero Emissions Commitments of Non-State Entities.

Need for and Alternatives to the Project

Gorski, Jan and Binu Jeyakumar. **Towards a Clean Atlantic Grid: Clean energy technologies for reliable, affordable electricity generation in New Brunswick and Nova Scotia.** The Pembina Institute, 2022. <https://www.pembina.org/reports/towards-a-clean-atlantic-grid.pdf>

Going in the Wrong Direction. Ontario Clean Air Alliance. April 15, 2025.

“energy efficiency and renewables can keep our lights on at less than half the cost of new gas-fired peaker plants and new nuclear reactors.” p. 12.

https://www.cleanairalliance.org/wp-content/uploads/2024/04/Going-in-the-Wrong-Direction-Report-apr-15-v_01.pdf

Sierra Club Atlantic Webinar: ***What if the wind doesn't blow!? A conversation with Stanford University Professor Mark Jacobson.*** Oct. 3 2022. <https://www.youtube.com/watch?v=XNulwYikgsW>

VPP POLICY PRINCIPLES. Authors: the VP3 Regulatory and Policy Strategy Working Group Contact: Avery McEvoy (amcevoy@rmi.org) February 2024.

https://rmi.org/wp-content/uploads/dlm_uploads/2024/02/vpp_policy_principles_updated.pdf

How Fossil Fuels Drive Inflation and Make Life Less Affordable for Canadians. International Institute for Sustainable Development. Jessica Kelly July 2024.

<https://www.iisd.org/system/files/2024-07/fossil-fuels-drive-inflation-canada.pdf>

Massive gas expansion risks overtaking positive climate policies New CAT analysis shows LNG expansion plans threaten 1.5°C warming limit. Climate Action Tracker. Climate Analytics & New Climate Institute. November 2022.

https://ca1-clm.edcdn.com/assets/cat_2022-11-10_globalupdate_cop27.pdf?v=1679478268

2023 Peak Demand Reductions from Demand Response. Efficiency Canada.

<https://www.energycanada.org/wp-content/uploads/2025/04/Chart-2-1.png>

GHG Emissions

Gas Leaks from Pipelines:

Methane Emissions from U.S. Gas Pipeline Leaks. August 2023. Renee McVay. Environmental Defense Fund

<https://www.edf.org/sites/default/files/documents/Pipeline%20Methane%20Leaks%20Report.pdf>

A National Estimate of Methane Leakage from Pipeline Mains in Natural Gas Local Distribution Systems. Weller et al. *Environ.Sci.Technol.*2020,54,8958–8967.

<https://pubs.acs.org/doi/pdf/10.1021/acs.est.0c00437>

Importance of reducing methane pollution from all sources:

Acting rapidly to deploy readily available methane mitigation measures by sector can immediately slow global warming. Ilissa B Ocko *et al* 2021 *Environ. Res. Lett.* 16 054042.

<https://iopscience.iop.org/article/10.1088/1748-9326/abf9c8>

Impact of Climate Change on the Project

The Project Description fails to describe how it will mitigate impacts of climate change on the project, including risks that will increase as we transition away from fossil fuels (increased risk to finances, legal risks etc.) and direct risk from wildfire, water scarcity, floods and storm events.

United Nations Environment Programme (2024). **Climate Risks in the Power Generation Sector.** Geneva..

<https://www.unepfi.org/wordpress/wp-content/uploads/2024/05/Climate-Risks-in-the-Power-Generation-Sector-1.pdf>

Risks Associated with Relying on Natural Gas. Hughes, D. Will Natural Gas Fuel America in the 21st Century? (Post Carbon Institute, 2011); available at:

<https://www.postcarbon.org/publications/will-natural-gas-fuel-america/>

“Summary

In *Will Natural Gas Fuel America in the 21st Century?*, geoscientist [David Hughes](#) (formerly of Geological Survey of Canada) shatters the myth that U.S. natural gas can be a “bridge fuel” from high-carbon sources of energy like coal and oil to a renewable energy future.

Natural gas has increasingly been touted as a “bridge fuel” from high-carbon sources of energy like coal and oil to a renewable energy future. This is based on renewed optimism on the ability of horizontal drilling and hydraulic fracturing to access natural gas from previously inaccessible shale gas deposits. A review of the latest outlook (2011) of the U.S. Energy Information Administration (EIA) reveals that all eggs have been placed in the shale gas basket in terms of future growth in U.S. gas production. Without shale gas, U.S. domestic gas production is projected to fall by 20% through 2035.”