



August 13, 2025

VIA EMAIL: Centrevillage@iaac-aeic.gc.ca

Impact Assessment Agency of Canada (IAAC)

Government of Canada

Re: Comments on the Summary Initial Project Description for the proposed Centre Village Renewables Integration and Grid Security Project

Please accept these comments on the Initial Project Description (IPD) for the proposed Centre Village Renewables Integration and Grid Security Project Located in Centre Village, New Brunswick, on behalf of Mi'gmawé'l Tplu'taqnn Incorporated (MTI) – a non-profit organization who represents eight of their nine member Mi'gmaq First Nation communities in New Brunswick: Amlamgog (Fort Folly) First Nation, Natoaganeg (Eel Ground) First Nation, Oinpegitjoig (Pabineau) First Nation, Esgenoôpetitj (Burnt Church) First Nation, Tjipôgtôtjg (Buctouche) First Nation, L'nui Menikuk (Indian Island) First Nation, Ugpi'ganjig (Eel River Bar) First Nation and Metepenagiag Mi'kmaq Nation for purposes of consultation.

Mi'gmawé'l Tplu'taqnn received notification of the proposed Centre Village Renewables Integration and Grid Security Project, on July 14, 2025. Although MTI staff were aware of a possible project, the MRIA could not be initiated until the Initial Project Description was received on July 14, 2025.

The Mi'gmaq are the original inhabitants of New Brunswick. We have occupied and cared for our lands and waters since time immemorial. Along with our Wabanaki brothers and sisters, we entered into sacred, constitutionally protected Treaties of Peace and Friendship with the Crown, and continue to exercise our Aboriginal and Treaty rights, including the rights to hunt, fish and gather up to the present day. The Treaties have been upheld, and these rights have been repeatedly proven and affirmed by the Supreme Court of Canada and the Courts of New Brunswick. The Mi'gmaq have never ceded their Aboriginal Title of ownership and stewardship over the lands and waters of New Brunswick to the Crown.

Mi'gmaq Aboriginal and Treaty Rights are potentially affected by this project. As a prerequisite, a Mi'gmaq Rights Impact Assessment must be completed MTI to determine whether consent will be given by the Mi'gmaq.

We recognize the urgency to address New Brunswick's growing energy demands and support renewable integration. However, the IPD raises several important concerns and



outstanding questions that must be addressed before the project advances further in the regulatory process.

Cultural Significance

The project area's proximity to the isthmus is of concern as this was a traditional meeting place and travel corridor of the Mi'gmaq throughout history.

The map on page 15 of the IPD incorrectly suggests that Indigenous land is limited to reserve lands. This inaccurate and misrepresents the reality of Mi'gmaq land use and governance, as our rights and relationship to the land extend far beyond reserve boundaries. This should be corrected to reflect the true scope of Mi'gmaq land and stewardship.

The project has the potential to directly affect Mi'gmaq rights, including our ability to use the land, harvest resources, and carry out cultural practices. We have Indigenous Knowledge (IK) data of moose harvesting within 10 kilometres of the proposed project site, which holds significant cultural value and food security. Also, road / lane closures during construction may cause disruption to access to hunting / gathering grounds in and around the project area, as travel ways are limited in this area.

The proponent also plans to remove merchantable timber through an agreement with J.D. Irving, but there has been no discussion about whether this material should be made available to Indigenous artisans and harvesters. In addition, while the project mentions opportunities for Indigenous employment, training, and procurement, the commitments remain general. We need clear details on how these opportunities will be created, supported, and sustained over the life of the project.

Ecological

The project is expected to discharge liquid effluent that could exceed CCME and FWAL guidelines for several contaminants. The discharge plan has not been finalized, one of the options under consideration is to release effluent into a wetland, which could potentially affect downstream fish habitat. An assimilation capacity study, however, was not complete at the time of filing.

The project is expected to use as much as 5,000 litres of water per minute when all gas turbines are running. A Water Supply Source Assessment has not yet been completed, so it is still unclear how drawing this much water will affect the surrounding hydrology or nearby wetlands, or how the large volumes of reject water will be managed. There is also a risk that the reject water could contain elevated levels of arsenic, lead, cadmium, and other metals. Without more information, the long-term impacts on both surface water and groundwater



remain unknown. Until such information is provided MTI is unable to carry out a Mi'gmaq Rights Impact Assessment.

The project will also result in the destruction of approximately 8.7 hectares of wetland. It is unclear what mitigation or offset measures are being proposed, and MTI's position is that any remediation should occur close to the project site.

BlackAsh and Yellow ladies'-tresses were identified during wetland/vegetation field surveys. Black ash is of cultural significance to the Mi'gmaq, with basket making being of note.

While dust control, herbicide use, and spill prevention are mentioned in the IPD documents, there is little detail on how these measures will be implemented or monitored. As this is a culturally and environmentally significant area due to it being a major migratory bird corridor, it is important to understand all possible effects. The need for herbicide over other means of grubbing / clearing would greatly improve our understanding of the project. It should be clarified whether herbicide use is planned in this area, given the proximity to a major transmission line, as this could contribute to cumulative effects.

Wildlife

This is a major migratory corridor and while the project description does mention some mitigation measures, such as avoiding sensitive areas during nesting periods, this commitment is undermined by the wording "unless unavoidable." Relying on qualified professionals to carry out surveys and provide recommendations is important, but the language leaves too much room for exceptions. The approach needs to ensure that protecting species at risk is treated as a priority, not something that can be set aside when it becomes inconvenient.

There were 18 bird species identified during the survey. With several being listed as threatened or species of concern. Bald Eagle was identified within this study and is listed as endangered through NB SARA. The Bald Eagle is of extreme importance to the Mi'gmaq, and its culturally significance cannot be understated.

Although no moose were identified during the survey, there is moose harvesting identified within 10 kilometres of the proposed project area as per our IK data, and must be considered.

Alternatives

Large-scale battery storage could be explored further, as it does not produce emissions like a gas-powered turbine. It is also unclear what the status is of the coal plant retirement that



is referenced as part of the project's rationale in carbon reduction as these plants serve very different functions to the grid.

One of our concerns is that this proposed project may not be reviewed by the New Brunswick Energy and Utilities Board. A facility of this size, at 500 megawatts of fossil fuel generation, would normally go through a public process where people have the chance to ask questions, raise concerns, and understand the potential impacts on electricity rates, emissions, and long-term energy planning. Skipping this step would mean losing an important opportunity for transparency and public input.

During our call with the agency on August 7, 2025, we asked whether they would consider this issue. They told us it likely falls outside their jurisdiction, but we believe it is still important to point out this gap.

Also, it should be clarified that although the NSMTC are involved with this proposed project, that must not be interpreted that Mi'gmaq consent will be granted. MTI is the consultative body for the Mi'gmaq of New Brunswick and, pursuant to the MRIA Framework, proper review and studies need to be undertaken to understand the impacts to Mi'gmaq rights.

In peace and friendship,