

To The Impact Assessment Agency Canada

August 13, 2025

Comments on Centre Village Renewables Integration and Grid Security
Synchronous Condensing/Generation Facility Project - Initial Project Description

By Ecological Justice Working Group, United Church of Canada, Regions East

Contact:

Dr. Mary Lou Harley

Thank you for the opportunity to comment on this Initial Project Description prepared by PROENERGY Holding Company, Inc.

The United Church of Canada has a long history of policies, documents, and submissions on social, environmental and ethical issues relating to energy issues and climate change. These Comments are grounded in that extensive base.

Overall

The proponent's document is thin in required detail and documentation, dismissive of several aspects that need to be comprehensively addressed, and inadequate in information in areas of potential impacts particularly related to this site selection.

The proponent provides comments but no data to justify this fossil fuel project as necessary to support a resilient grid that is able to ramp power up or down, shift loads, and balance variable power inputs like solar, wind, hydroelectric and geothermal as is the intention of modernized grids. Alternatives to this project for the grid-supportive purposes such as modern storage systems are not seriously presented with data.

The site is completely unacceptable from an ecological assessment as well documented and nationally and internationally recognized, though not acknowledged by the proponent. The project site selection was made based on its proximity to an existing NB Power 138 kilovolt transmission line and the Maritimes and Northeast Pipeline (M&NP) 30" natural gas pipeline. Lists of biota

surveys are helpful to highlight the biodiversity of the area, however the dynamic ecological importance is missing from the proponent's information.

The proponent's project description is wholly inadequate in addressing the scope of impacts to the New Brunswick, Nova Scotia and the Chignecton Isthmus that connects us.

Indigenous Sovereignty and Rights

Comments posted on the IAAC website raise concerns about the rights of the Indigenous people in this impact assessment process. The fact that North Shore Mi'kmaq Tribal Council (NSMTC) is a minority equity holder must not be used by Proenergy or its subsidiary, WattBridge, to substitute in any way for its consultation and other responsibilities.

The Guidelines should clarify the duties of the Crown and the responsibilities of the proponent. The Guidelines must require that the proponent not only be seen to be carrying out engagement activities with Indigenous communities but must demonstrate that

- Indigenous sovereignty is being respected and will continue to be fully respected
- constitutional and legal frameworks are being strictly adhered to, including
 - Section 35 of the Constitution Act, 1982, which affirms Indigenous treaty rights;
 - the United Nations Declaration on the Rights of Indigenous Peoples Act (UNDA), which mandates free, prior, and informed consent (FPIC); and
 - related landmark Supreme Court rulings
- Indigenous communities are being meaningfully consulted and fully involved in all decisions that affect their lands, resources, and communities
- the proponent's interactions with Indigenous people meet both legal obligations and the moral responsibility to uphold the principles of reconciliation.

Require that the proponent state and demonstrate throughout their material, the proponent's understanding of the meaning and requirements of engagement,

consultation, treaty rights, and the proponent's role and responsibilities as being Treaty People.

Additional Issues

In addition to the points discussed, some of the many other issues that the Initial Project Description fails to adequately address include:

- local jobs, short-term and long-term, compared to renewable energy options
- negative impacts on local economy
- negative impacts on wetlands
- the very significant impact of the water withdrawal
- how reduced water flows would impact downstream water users and ecosystems
- the impacts of flooding on the power plant
- full details of emergency planning for various scenarios and severities
- impacts short term and long term to surrounding agricultural land, crops and livestock
- impacts to plants and wildlife short term and long-term, and protection plan for the wildlife including aquatic, birds, protection zones
- impact to sustenance from the surrounding area
- health concerns
- baseline studies needed for water quantity, quality and potential impact on watershed, groundwater sources and routes, and wells
- how the water sources are to be protected.