



Summary of the Project Description for the Centre Village Renewables Integration and Grid Security Project

Submitted by:

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1.0 Introduction

Elsipogtog First Nation (EFN, Elsipogtog) and Kopit Lodge have undertaken an initial review, as a part of the Impact Assessment Agency of Canada (IAAC) application process, for the Wattbridge/PROENERGY Holding Company Inc. (Wattbridge; the Proponent) proposed Centre Village Renewables Integration and Grid Security Project (the Project, CV RIGS). This infrastructure project is intended to develop an additional 500 megawatt (MW) of in-province power generating capacity.

The Project lies within our Sacred Traditional Territory, where our people have lived, hunted, fished, and gathered since time immemorial. Our connection to these lands and waters is inseparable from our identity, and any disturbance to this landscape carries implications for our rights, responsibilities, and cultural continuity. Despite generations of colonial policies, Elsipogtog remains rooted in these lands.

We are committed to ensuring that the Project proceeds in a manner that respects Mi'kmaq rights, values, and governance. In this Report, we have prepared initial comments on the Project Description with a focus on the potential impacts on our Aboriginal rights and interests.

2.0 Elsipogtog First Nation

EFN is a community of the Mi'kmaq Nation whose present-day members, and ancestors have always, live(d) on, care(d) for, and exercise(d) jurisdiction over Mi'kma'ki in accordance with Mi'kmaq laws, culture and protocols.

The Mi'kmaq Nation holds and exercises inherent and constitutionally protected Aboriginal and Treaty rights, including title, throughout Mi'kma'ki which are recognized and affirmed by the *Constitution Act, 1982* ("Mi'kmaq Rights"). In particular, EFN members hold stewardship obligations under Mi'kmaq law to protect and care for the lands and waters in the portion of Mi'kma'ki known as Sikniktuk. We have never surrendered, ceded, or sold the Aboriginal Title to any of our lands throughout Mi'kma'ki and continue to hold the right to make decisions over, care for, and generate economic benefits from our title lands.

Our members have the right to hunt, fish, trap, and harvest water, animals, plants and other resources, for food, medicine, lodging, clothing, crafts, fuel and livelihood, to nurture our culture and connection with the land, to respect and honor the Creator and govern in a way that aligns with our Mi'kmaq culture, values and traditional teachings.

Our ancestors were signatories to the Peace and Friendship Treaties, which sets out mutual promises between the Mi'kmaq and the Crown to guide our ongoing relationship across Mi'kma'ki and ensure peace, and which protects our members' inherent rights to hunt, fish, gather and commercially trade as Treaty rights. The Peace and Friendship Treaties corroborated Mi'kmaq Rights.

The Mi'kmaq Nation's title lands of Mi'kma'ki are divided into seven geographic districts. In 2016, EFN filed an Aboriginal title claim on behalf of the Mi'kmaq Nation to the district of Siknigtuk in Mi'kma'ki. The claim preserves the right to expand the title claim to other Mi'kmaq title lands in Mi'kma'ki. EFN has a special responsibility for the protection of Mi'kmaq Rights in Siknigtuk.

In 2019, EFN and Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) signed a Memorandum of Understanding (MOU) to enter into negotiations to explore new ways to achieve reconciliation based on the recognition of rights, respect, co-operation and partnership, with the ultimate goal of harmonizing Mi'kmaq and Crown titles in Siknigtuk.

2.1 Kopit Lodge

The Iapjiw Maliaptasiktitiw Wskwitqamu Consultation Delegation at Kopit Lodge (Kopit Lodge, KL) is mandated by Chief and Council of EFN to protect and defend our Mi'kmaq Rights on behalf of EFN throughout Mi'kma'ki, including Siknigtuk, for seven generations to come. Kopit Lodge takes direction from EFN to assist in discussions with the Crown, as represented by the federal and provincial government and their agents, and where appropriate industry proponents, with respect to the protection and implementation of our Mi'kmaq Rights.

3.0 The Centre Village Renewables integration and Grid Security Project

The CV RIGS Project is a high-voltage infrastructure development intended to improve electrical capacity by generating up to 500 megawatts of electricity via gas turbines, which would improve system reliability and provide back-up energy generation. The project is expected to operate for about 25 years.

Led by WattBridge Energy, the Project is designed to increase grid capacity and operational flexibility while enabling greater integration of renewable energy sources. Major infrastructure components include ten dual-fuel Combustion Turbine Generators (CTG) which will be capable of generating electricity using both natural gas and diesel. CTG technology is derived from the aerospace industry and allows the CTGs to start quickly and achieve full operating power in a very short period. Each CTG will be on

concrete pads and supported by a lube oil cooler, water spray power augmentation system, nitrogen oxides (NOx) water injector, air filter system, air recirculating inlet heating system, air fogging system, generator breaker & protection panel, and clutch synchronous condensing systems. Each CTG will also be equipped with a separate exhaust stack.

The proposed Project is subject to federal environmental assessment and permitting processes, as it will follow the IAAC.



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Figure 1: Map of the CV RIGS Project area. Retrieved from <https://iaac-aeic.gc.ca/050/evaluations/document/162387>

4.0 EFN Initial Comments on the Initial Project Description

EFN and Kopit Lodge have prepared some initial comments on the Project Description. These comments have been prepared based on a cursory review of the information that is publicly available and without any engagement from EFN community members. It is necessary that the IAAC and the Proponent meaningfully consult with EFN to allow for our community to make a free, prior, and informed decision about whether to support or oppose this Project.

- EFN community members have a deep connection to this area and use the lands for hunting, trapping, fishing, gathering, and other traditional activities. EFN expresses readiness to defend their land, rights, and future. This Project will require a deep level of consultation and commitment from the Proponent and Crown to ensure that EFN rights are respected.
- The project relies on natural gas and diesel-fired power generation, which are high-emitting fossil fuels. These pose significant threats to air quality, local waterways, wildlife habitats, and traditional food and medicine sources. The infrastructure increases the risk of spills, flaring, and long-term land degradation.
- The summary of the initial project description fails to adequately address the potential long-term impacts on surrounding ecosystems. Rather than adopting a holistic, cumulative approach, it isolates habitat types and treats their roles in ecosystem function as separate and unrelated. For instance, unnamed tributaries, fragmented wetland areas, and the terrestrial topography of the project site are presented as if pollution would affect each independently. In reality, wetlands serve as critical regulators for streams and creeks, which in turn feed into brooks and rivers. If these wetlands are compromised—whether through vegetation removal that disrupts temperature regulation or contamination from pollutants—the resulting degradation could cascade far beyond the immediate study area, threatening the health and stability of a much larger ecological network.
- Approving new fossil fuel-based generation in 2025 contradicts Canada's climate commitments and NB Power's stated environmental goals. Methane leaks from natural gas and pollutants from diesel are especially harmful and undermine climate science and environmental justice.
- There has been a lack of consultation with Elsipogtog First Nation and the broader Mi'kmaq community for this Project. This must be remedied as part of the ongoing Impact Assessment process as a requirement of the Crown's duty to consult and the need for meaningful reconciliation efforts.

- The project involves long-term contracts with a U.S.-based energy company during a period of rising cross-border economic tension and trade disputes. This is viewed as tone-deaf and irresponsible, especially for a Crown corporation. Benefit should flow domestically to Canadian entities and First Nations if this project is stand on any merit.
- EFN and Kopit Lodge must be involved in the development of a project-specific consultation and engagement process that is funded by the Crown and Proponent.