

Public Comment – Riverside Generating Station (Atura Power)

Submitted by: Chippewas of Kettle and Stony Point First Nation / Three Fires Group

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The Chippewas of Kettle and Stony Point First Nation (CKSPFN), through its Consultation Office (Three Fires Group), submits the following comments on Atura Power’s Initial Project Description for the proposed 500 MW Riverside Generating Station near Sarnia, Ontario.

The project is located within Treaty 29 territory and within a region already burdened by industrial air emissions. CKSPFN is concerned that the federal Impact Assessment process continues to apply too narrow a definition of “federal jurisdiction,” excluding issues such as air quality, greenhouse gas (GHG) emissions, and regional cumulative effects. These issues directly affect Indigenous rights, health, and territorial stewardship under Section 35 of the Constitution Act.

Air Quality Concerns:

Atura’s preliminary air quality modeling (SLR Consulting) may underestimate actual and cumulative effects. It assumes only 1,500 operating hours per year, yet no binding regulation ensures this limit will persist. Increased operation could elevate NOx and ground-level ozone levels—already a concern in Sarnia–Lambton. The cumulative effects assessment also excludes other regional gas proposals such as the Hydrogen Ready project.

Greenhouse Gas Emissions:

Atura’s estimate of 345,000 tonnes of GHGs per year relies on optimistic efficiency assumptions and limited operational modeling. It is unclear whether the project will be considered “planned” or “new” under the federal Clean Electricity Regulations (CER). This classification will significantly affect allowable emissions and compliance requirements. IAAC should ensure transparency regarding Atura’s modeling assumptions and CER status.

Duty to Consult and Participation:

CKSPFN emphasizes that consultation must be meaningful, adequately funded, and distinct from general public engagement. The project’s cumulative and long-term effects on air quality, health, and land use require Indigenous-led monitoring, assessment, and participation in ongoing review processes.

Requests:

CKSPFN respectfully requests that IAAC:

1. Require a federal Impact Assessment for the Riverside project given its cumulative and transboundary implications.



2. Direct Atura Power to conduct a regional cumulative effects assessment including ground-level ozone formation and multiple natural gas projects.
3. Require disclosure of assumptions, efficiency data, and CER classification in GHG modeling.
4. Support Indigenous-led participation and potential involvement in Renewable Natural Gas, and carbon offset opportunities, including planning and design of offsetting technology and mitigation pathways.

The cumulative air and climate burdens in this region warrant a higher level of federal oversight and recognition of Indigenous rights and jurisdiction in energy decision-making.