



October 6, 2025

Submitted to the online Registry

To the Impact Assessment Agency of Canada,

Re: Riverside Generating Station Project (ref # 89801)

The proposed Riverside Generating Station Project would be located on Chippewas of the Thames First Nation's Treaty and Traditional Territory, as recognized by Canada in the Big Bear Creek Settlement Agreement (2013). COTTFN holds ancestral connections to the lands and waters and continues to exercise stewardship and practice inherent rights in Deshkan Ziibiing Anishinaabe Aki.

Consultation staff have met with Atura Power and reviewed the IPD, but the project is still undergoing review by leadership and the community. For this reason, we are only able to provide preliminary comments. Given the short comment period, COTTFN expects that the Agency will consider any future communications.

As Ontario procures new energy capacity, Rights Holding First Nations must be fully involved in assessing cumulative impacts, designing mitigation measures, and participating in economic opportunities taking place in our territories. As a forward-looking Nation, COTTFN is interested in projects that will sustainably meet our energy needs while upholding and respecting Anishinabek rights.

While the modelling for the Riverside Project suggests that key pollutants would measure below applicable limits, we are concerned about the cumulative impacts to air quality in the Sarnia/St Clair region, including for our sister Nation of Aamjiwnaang. Air pollution from this gas plant could impact the health of neighbouring human and non-human relatives. The air quality assessment does not consider other regional gas proposals. Modelling also makes assumptions about operating hours that may be exceeded in practice, leading to greater emissions. COTTFN requires additional information on Atura's plans to reduce emissions of nitrogen oxides and other pollutants. The IPD is also unclear as to the project's status under the Clean Electricity Regulations. Finally, COTTFN is concerned about water usage and wastewater discharge considerations.

COTTFN will continue to review the project and assess impacts to the Nation's constitutionally protected Aboriginal and Treaty rights.

COTTFN Consultation Unit

