

**Enclosure 1: Provincial Authority Advice Record – New Nuclear at Wesleyville Project**  
Registry No. 89802

Please submit the completed form by February 11, 2026, via email to [wesleyville@iaac-aeic.gc.ca](mailto:wesleyville@iaac-aeic.gc.ca).<sup>1</sup>

**Department/Agency Contact Information**

<b>Submission Date</b>	February 12, 2026
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Review the draft Initial Project Description and answer the following questions:

1. Will your department or agency exercise a **power, perform a duty or function**, or provide **financial assistance**, related to the project to enable it to be carried out in whole or in part?

As relevant,

- a) Specify the power, duty or function, or financial assistance, and the likelihood that it will be required to construct the project, as either Required, Potential, Likely, Unlikely or Not Required.
- b) Describe any associated Indigenous or public consultation, including timelines, and elaborate on any potential opportunities for consultation coordination with the impact assessment process, if an impact assessment is required
- c) Describe any associated information requirements (e.g., alternative means assessment, habitat offsetting), and specify those that may be coordinated with the impact assessment process, if an impact assessment is required
- d) Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide
- e) Indicate whether your department or agency has identified any power that it will be unable, or may be unable, to exercise to allow the project to proceed, in whole or in part as currently planned, with reasons; if unsure, explain what must be resolved to increase confidence

(a) Although the Ministry of Citizenship and Multiculturalism (MCM) does not issue permits or authorization, the Ministry exercises a statutory advisory and oversight function related to the conservation of cultural heritage resources under the *Ontario Heritage Act* and associated provincial standards, policies, and guidelines.

MCM does not provide financial assistance in relation to the construction or operation of projects, completion of technical studies or review of technical studies by external parties.

<sup>1</sup> Please note that advice provided to IAAC may be posted on the Canadian Impact Assessment Registry Internet Site or otherwise made available to the public.

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MCM will review any technical cultural heritage studies related to this Project to ensure compliance with the *Ontario Heritage Act* and more generally, support fulfillment of due diligence related to heritage. This is **Required** for the construction of the project.

To meet its obligations related to the conservation of cultural heritage resources, including their identification, protection and wise management, the proponent retains qualified persons to prepare technical cultural heritage studies (e.g., archaeological assessments, cultural heritage evaluations, heritage impact assessments). It is these studies that MCM reviews.

MCM is interested in cooperating with the Agency on this analysis and participating in a cooperative review of the project information.

Under its mandate to conserve Ontario's cultural heritage, MCM applies the following processes and approvals to address potential adverse effects on cultural heritage resources, including archaeological resources, built heritage resources and cultural heritage landscapes.

### **Ontario Heritage Act, Part III.1**

The [Standards and Guidelines for Conservation of Provincial Heritage Properties](#) (PHP S&Gs), prepared under section 25.2 of the *Ontario Heritage Act* (OHA), came into effect on July 1, 2010. All Ontario government ministries and public bodies prescribed under Ontario Regulation 157/10 are required to comply with the PHP S&Gs. They apply to property that is owned or controlled by the Crown in right of Ontario or by a prescribed public body.

Ontario Power Generation (OPG) is a prescribed public body under the OHA. As the proponent and the entity exercising control over the project area, OPG must fulfill its responsibilities under the *OHA*. Among other responsibilities with the PHP S&Gs, OPG's is to follow its Heritage Identification and Evaluation (I&E) Process, which was approved by MCM in 2025.

### **Ontario Heritage Act, Part VI**

Under the OHA, MCM regulates archaeology and licenses archaeologists. The ministry reviews archaeological reports as a condition of licensing in accordance with Part VI of the OHA. This review is to ensure archaeologist has met the terms and conditions of their license, that the archaeological sites have been identified and documented according to the standards set by MCM and that the archaeological fieldwork and report recommendations ensure the conservation of archaeological resources.

Once they have reviewed an archaeological report, MCM staff provide the archaeologist with a letter. If the report complies with the [Standards and Guidelines for Consultant Archaeologists](#) (MCM, 2011), the letter informs the archaeologist that the report has been entered into the Ontario Public Register of Archaeological Reports. The letter is copied to the proponent (e.g., ministry or prescribed public body) and the approval authority (e.g., Ministry of the Environment, Conservation and Parks, Impact Assessment Agency of Canada). Approval authorities often rely on the letter to address legislative requirements.

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(b) At this time, MCM does not undertake Indigenous or public consultation for projects undertaken by public and private sector proponents and does not provide participant funding. However, MCM may be called upon to meet with Indigenous communities and proponents to clarify requirements under the OHA (e.g., archaeological reports) and associated regulations.

Cultural heritage resources, which include archaeological resources, built heritage resources and cultural heritage landscapes, are often of critical importance to Indigenous communities. Indigenous communities may have knowledge that can contribute to the identification of cultural heritage resources, and we suggest that any engagement with Indigenous communities include a discussion about known or potential cultural heritage resources that are of value to them. In order to support IAAC's analysis of Indigenous Peoples' physical and cultural heritage, we recommend that the technical cultural heritage studies be submitted for Indigenous communities for review.

Please note that engagement by licensed archaeologists under the [Standards and Guidelines for Consultant Archaeologists](#) (Archaeology S&Gs) during the archaeological assessment process may provide Indigenous communities with the opportunity to provide information and identify concerns at an early stage, prior to any consultation that may be required on any subsequent Crown decisions. On a practical basis, this engagement may support the Crown in meeting its duty to consult on these subsequent decisions. However, engagement under the Archaeology S&Gs by a licensed archaeologist is not enough by itself to demonstrate the Crown's duty to consult has been met.

We understand that IAAC has signed a Memorandum of Understanding (MoU) with the Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations (MS-WTFNs) on how their information should be used and considered in the context of the integrated assessment. MCM is discussing internally the implications for its regulatory processes. At this time, MCM advise that OPG shared the MoU with MS-WTFNs with qualified persons who are undertaken technical cultural heritage studies.

(c) The *Ontario Heritage Act* (OHA) provides the legislative framework for identifying, evaluating, and conserving cultural heritage resources. It sets out the processes through which cultural heritage properties, archaeological sites, built heritage resources, and cultural heritage landscapes are recognized and protected.

The Act operates in coordination with other legislations, which will trigger technical cultural heritage studies, to ensure that cultural heritage resources are conserved when ground disturbance, site alteration, or development is authorized by other statute. Within this framework, approval authorities (such as those responsible for planning, environmental assessment, infrastructure, or sector-specific legislation) require proponents to undertake technical cultural heritage studies to assess and mitigate potential impacts on heritage resources and to demonstrate due diligence.

Under the Impact Assessment Act (IAA), the Impact Assessment Agency of Canada has the authority to require technical cultural heritage studies, including archaeological assessments, built heritage or cultural heritage landscape evaluations, or other related cultural heritage technical work, when they are necessary to assess potential impacts. This approach aligns with the Ontario's regulatory structure and the technical heritage studies will be undertaken to support and inform decision-making.

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(d) MCM notes that in general the IPD sections addressing cultural heritage should clearly describe the current heritage status of the project area and identify the technical cultural heritage studies that are underway. Please see detailed recommendations below.

As noted above (response item a), OPG is a prescribed public body under the OHA and has its own Heritage Identification and Evaluation (I&E) process, approved by MCM in 2025. OPG has identified the Wesleyville Village area as a provincial heritage property in 2015, based on Cultural Heritage Evaluation Reports that found it to meet the criteria set out in Ontario Regulation 9/06. In compliance with the PHP S&Gs, a Strategic Conservation Plan (SCP) has been developed for Wesleyville Village. The SCP provide guidance on conserving, maintaining and using the provincial heritage property that should inform other technical heritage studies.

At this time, it is not clear whether the project may impact the cultural heritage value and the heritage attributes of know or potential provincial heritage property. If impacts to any provincial heritage properties, a Heritage Impact Assessment (HIA) may be required to determine the proposed activity impacts on the properties cultural heritage value and proposed mitigation measures.

We note the Wesleyville Village description provided on page 94 and 151 and the area identified as 'Friends of Wesleyville' on Figure 6 do not align with the provincial heritage property description and its boundaries. MCM recommends incorporating a summary of the Wesleyville Villages' Statement of Cultural Heritage Value (SCHV) to the section 3. Part C – Location Information. The SCHV also provides a list of the key attributes or elements that must be retained that may be impacted by the Project.

While the identify built heritage resources and cultural heritage landscape of Wesleyville are located in a portion of the property (that seems to be aligned with the light pink area on Figure 6), the recognition as a provincial heritage property applies to the property's legal boundaries and not only to a portion of the property as illustrated. MCM understand that the Wesleyville Village is under a lease to the Friends of Wesleyville. However, OPG still exercises control over the property.

The information and knowledge shared by Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations (MS-WTFNs) provide an understanding of the cultural heritage potential of the Project area. However, OPG's compliance with the Ontario Heritage Act is not substitute by Indigenous-led review.

Community input should be sought to identify locally recognized and potential cultural heritage resources, including marine and terrestrial archaeological resources, built heritage resources and cultural heritage landscapes. Sources include, but are not limited to, municipal heritage committees, historical societies and other local heritage organizations.

As cultural heritage resources are often of critical importance to Indigenous communities. Indigenous communities may have knowledge that can contribute to the identification of cultural heritage resources, and we suggest that any engagement with Indigenous communities includes a discussion about known or potential cultural heritage resources that are of value to them.

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### Built Heritage Resources and Cultural Heritage Landscapes

While the northwest portion of the Project area was assessed and a provincial heritage property was identified, it is not clear whether the *entire Project area* was assessed to identify cultural heritage resources, including built heritage resources, cultural heritage landscape and archaeology resources. Without further assessments, it is not possible to determine Physical Cultural Heritage 'Real and Potential Adverse Impacts and Effects'.

The Project location section should be revised if there are any known or potential built heritage resources and cultural heritage landscapes and identify any additional technical heritage studies that need to be carried out to assess potential project impacts. OPG's Heritage I&E process currently adopts MCM's screening tool ([Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes - Forms - Central Forms Repository \(CFR\)](#)). Given the presence of a provincial heritage property within the Project area, as well as the potential for cultural heritage landscapes as informed by MS-WTFNs on section 5.6, the completion of the screening tool will trigger an evaluation process.

As this project covers a large study area, MCM recommends Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment should be undertaken for the entire study area during the planning phase and be summarized in the Impact Statement. This study will:

1. Describe the existing baseline cultural heritage conditions within the study area by identifying all known or potential built heritage resources and cultural heritage landscapes, including a historical summary of the study area. OPG's Heritage Identification and Evaluation has adopted MCM screening checklist that may assist with this exercise: ([Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes](#)).
2. Identify preliminary potential project-specific impacts on the known and potential built heritage resources and cultural heritage landscapes that have been identified. The report should include a description of the anticipated impact to each known or potential built heritage resource or cultural heritage landscape that has been identified.
3. Recommend measures to avoid or mitigate potential negative impacts to known or potential built heritage resources and cultural heritage landscapes. The proposed mitigation measures are to inform the next steps of project planning and design.

MCM recommends that the Cultural Heritage Report is carried out so that step 1 described above is undertaken early in the planning process. Then, steps 2 and 3 can be undertaken once the preferred alternatives have been selected.

Cultural Heritage Reports will be undertaken by a qualified person who has expertise, recent experience, and knowledge relevant to the type of cultural heritage resources being considered and the nature of the activity being proposed.

The MCM Minister's Consent may be required where a property owned or controlled by the province and has been identified as a provincial heritage property *of provincial significance* (Part III.1, OHA). The Cultural Heritage Report should clarify whether any built heritage resources and/or cultural heritage landscapes would be identified as a potential

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provincial heritage property of provincial significance. We note that Wesleyville Village has been identified as a provincial heritage property of *local significance*, and an assessment and evaluation will determine whether any portion of the Project area meets criteria under Ontario Regulation 10/06 that identifies provincial significance.

We also note that Archaeological resources may be evaluated for their cultural heritage value or interest, either itself as a site or as a heritage attribute within a broader property.

### Archaeological Resources

The Project may impact on marine and terrestrial archaeological resources and archaeological assessments will be required. The Initial Project Description should identify any archaeological assessments that are being undertaken. The information and knowledge shared by Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations (MS-WTFNs) under section 5.6 speaks to the Project location high potential for archaeology. However, OPG has yet to provide information in order to be compliant with Part VI of the OHA.

Additionally, it is not clear whether Project may impact marine archaeological resources. As this project may include shoreline or in-water works and impact may impact areas of marine archaeological potential, the project area should be screened using the MCM's [Criteria for Evaluating Marine Archaeological Potential](#) (if shoreline or in-water works are proposed) to determine if a marine archaeological assessment is required. The information of this screening could be incorporate under section 5.4 Real and Potential Impacts to Marine Environment or Interprovincial/International Waters.

MCM records indicate that the following assessments have been initiated:

- Stage 1&2 Archaeological Assessment (under Project Information Form (PIF) number P327-0082-2024) of a portion of the west project area.
- Stage 1 Archaeological Assessment (under PIF number P208-0409-2025).
- Stage 2 Pedestrian Survey Archaeological Assessment (under PIF number P311-0386-2025).
- Stage 2 Borehole Area-Specific Archaeological Assessment (under PIF number P208-0438-2025).
- Marine archaeology licence #2025-46, which has been renewed to continue work in 2026.

The results of all archaeological assessments have yet to be reported to MCM.

The *Ontario Archaeological Sites Database* (administered by MCM) currently shows 7 known archaeological sites within the Project area and several documented archaeological sites adjacent to the Project area.

Please note that archaeological concerns have not been fully addressed until reports have been entered into the Ontario Public Register of Archaeological Reports ('the Register') where those reports recommend that:

1. the archaeological assessment of the project area is complete and
2. all archaeological sites identified by the assessment are either of no further cultural heritage value or interest (as per Section 48(3) of the Ontario Heritage Act) or that mitigation of impacts has been accomplished through excavation or an avoidance and protection strategy.

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Approval authorities and/or proponents should wait to receive the MCM's written confirmation that the archaeological assessment report(s) has been entered into the Register before issuing a decision or proceeding with any ground disturbing activities. The letter will also indicate either that there are no further concerns for impacts to archaeological resources or articulate next steps to

Project proponents must follow the recommendations of the archaeological assessment report(s). MCM recommends that further stages of archaeological assessment (if recommended) be undertaken as early as possible and prior to any ground disturbing activities.

(e) MCM will be able to confirm any power that it will not be exercising or may be unable to exercise to allow the project to be carried out, in whole or in part, after all associated technical cultural heritage studies are completed and reviewed.

4. **Using Table 1**, identify project- and context-specific **key issues** based on the expertise within your mandate and the information in your possession. Available information may include your access to databases and corporate knowledge, the draft Initial Project Description, any exchanges with the proponent or others related to the project and known means to address the effects.

For each key issue:

- a) Specify the key issue (e.g., specific species and location)
- b) Specify the project component or activity linked to the key issue
- c) Explain why it is a key issue based on:
  - i. biophysical effect pathway(s) from the specific project component or activity
  - ii. concerns unique to the project or a priority within your mandate
  - iii. the issue being material<sup>2</sup> to decision-making under the *Impact Assessment Act*
- d) Potential pathways from key issues that could lead to an impact on Indigenous Peoples and their rights
- e) Identify how the issue could be resolved, including through other means than an impact assessment (e.g., other regulatory oversight)
- f) Identify additional information the proponent could provide to build confidence about how the issue could be addressed through other means

IAAC has prepared a preliminary list of potential effects that are likely to be key issues for the impact assessment.<sup>3</sup> While completing **Table 1**, IAAC requests that, as appropriate based on your department or agency's mandate and expertise, you validate this list, add precision or rationale where appropriate, and recommend any additional key issues for consideration. For a federal work or undertaking, such as nuclear energy works, a broader range of effects are within federal jurisdiction, including socio-economic effects.

IAAC has identified the following topics as **potential key issues** for the impact assessment:

- Effects to Biological Environment: vegetation (terrestrial, riparian and wetland environments), wildlife, reptiles and amphibians, fish and fish habitat, birds, species at risk
- Effects to Physical Environment: geology and geochemistry, soils and sediment, ambient radioactivity, air quality/emissions, surface water quality/quantity, groundwater quality/quantity, effects to Lake Ontario
- Accidents and malfunctions and effects of the environment on the project
- Impacts to Indigenous rights, current use of lands and resources for traditional purposes, physical and cultural heritage of Indigenous peoples and sites of archaeological importance,

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<sup>2</sup> An issue is material to decision making if its analysis is anticipated to affect the conclusions on (1) whether adverse effects within federal jurisdiction or direct and incidental adverse effects (collectively adverse federal effects) are likely not significant, or of low, medium or high significance; (2) appropriate mitigation measures for significant adverse federal effects; or (3) justification in the public interest.

<sup>3</sup> IAAC has prepared this list based on limited information prior to receipt of the draft Initial Project Description. It may change based on input received from federal and provincial authorities, Indigenous communities, and the public.

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- with a focus on potential archaeological resources on land or water, and species of cultural importance
- Effects to the health, social and economic conditions and the positive and negative consequences of these changes that are likely to be caused by the carrying out of the designated project

The Project may impact cultural heritage of significance for non-Indigenous peoples. Although the effects within federal jurisdiction are related to Indigenous peoples, baseline conditions should also include non-Indigenous communities that may identify areas of cultural heritage value (significance) within the project's location.

Katherine Cappella, on behalf of Caitlyn  
Tindale  
Director, Heritage Operations Branch/  
Citizenship, Inclusion and Heritage Division,  
Ontario's Ministry of Citizenship and  
Multiculturalism

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Name and title of Departmental /  
Agency Responder

February 12, 2026

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Date

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**Table 1: Key Issues to inform the impact assessment process**

This table should outline key issues to inform the impact assessment process, including whether an impact assessment is required and, if so, the scope of the assessment and tailoring of the Tailored Impact Statement Guidelines.

Key issues are the major concerns directly related to a project component or activity, the analysis of which is anticipated to be material to decision-making under the *Impact Assessment Act*.

Provincial authorities' advice should be guided by the identification and resolution of key issues. If an impact assessment is required, it will be focused on key issues.

Comment ID	a) Key issue	b) Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Impacts on Indigenous Peoples and their rights	e) Means for issue resolution	f) Additional information from the proponent
<p>Identify each comment by your organization's acronym and a sequential comment number.</p> <p>e.g.: IAAC-01</p>	<p>Specify each key issue (e.g., specific species and location).</p>	<p>Identify the project component or activity linked to the key issue.</p> <p>Be specific about the nature, scale, novelty and complexity of the component or activity.</p>	<p>Identify the specific effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).</p>	<p>Describe why it's a key issue within the mandate of your department or agency, including in terms of priorities of the federal government and in terms of anticipated likelihood, severity or uncertainty of effects.</p> <p>Identify if the key issue is common for project activities of this nature or in this sector, or whether it is unique to this project due to the project's complexity, size or novelty; a sensitive or rare receiving environment; and/or proximity of sensitive environmental or human receptors (including Indigenous Peoples).</p>	<p>Describe why the key issue is material to decision-making as either:</p> <ul style="list-style-type: none"> <li>an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including:                             <ul style="list-style-type: none"> <li>provincial experts' knowledge and experience with past project assessments;</li> <li>presence of sensitive species, habitats or human receptors (including Indigenous Peoples);</li> <li>novel or complex project activities, components or technologies;</li> <li>high uncertainties in effects or in the effectiveness of mitigation measures;</li> <li>unknown or unproven mitigation; or</li> </ul> </li> <li>a factor for the justification in the public interest anticipated to be material to decision-making such as a likely positive effect contributing to sustainability, to Canada's environmental obligations or climate change commitments or in supporting governmental priorities, such as reconciliation with Indigenous Peoples.</li> </ul>	<p>Describe how key issues you have identified within your mandate and expertise may lead to impacts on Indigenous Peoples and their rights.</p> <p>This advice must be informed by knowledge and input from Indigenous Nations and communities during the comment period, or within the Initial Project Description to support a more accurate, respectful and collaborative assessment.</p>	<p>Describe how the key issue could be resolved or addressed by:</p> <ul style="list-style-type: none"> <li>Any means, including powers, duties, functions, frameworks, policies or guidance for which your department or agency is responsible;</li> <li>Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province;</li> <li>Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or</li> <li>Commitments made by the proponent (e.g., in the Initial Project Description).</li> </ul>	<p>Describe information the proponent could provide, or commitments the proponent could make, that would provide confidence that the issue can be resolved by existing means (to be considered for the final Initial Project Description, future Summary of Issues and response, or (potential) Tailored Impact Statement Guidelines).</p> <p>Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.</p>
MCM-01	Project Activities and Components may impact on known or potential <b>built heritage</b>	MCM has an interest in any project components and activities that may affect built heritage resources and cultural heritage	Physical and cultural heritage of Indigenous peoples and non-Indigenous peoples,	As this project is within lands owned or controlled by OPG, the Standards and Guidelines for Conservation of Provincial Heritage Properties (PHP S&Gs) apply.	Built heritage resources and cultural heritage landscapes are material to federal decision making where project activities may result in adverse effects on Indigenous peoples, including effects on physical and cultural heritage, as described in Section	Cultural heritage resources are often of critical importance to Indigenous communities.	It seems that there is potential for built heritage resources and/or cultural heritage landscapes within the project area.  The Initial Project Description should be revised to:	MCM recommends Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment should be undertaken for the entire study area during the planning phase and be summarized in the Impact Statement. This study will:

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Comment ID	a) Key issue	b) Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Impacts on Indigenous Peoples and their rights	e) Means for issue resolution	f) Additional information from the proponent
	<p><b>resources and cultural heritage landscapes.</b> that are of interest of Indigenous peoples and non-indigenous people.</p>	<p>landscapes through physical disturbance of land, generation of vibration, alteration of access, visual character, and spatial relationships.</p> <p>This project activity may cause damage to, loss of, or alteration in the integrity, context, or accessibility of Indigenous archaeological resources, built heritage resources, and cultural heritage landscapes.</p>	<p>including archaeological resources, built heritage resources, cultural heritage landscapes and places of cultural, spiritual, or historical importance.</p>	<p>OPG, the proponent, is a prescribed public body under the <i>Ontario Heritage Act</i>, Part III.1, section 25.2. In compliance with the PHP S&amp;Gs, OPG Heritage Identification and Evaluation (I&amp;E) process was approved by MCM.</p> <p>Wesleyville Village has been identified as a provincial heritage property by OPG.</p> <p>While some cultural heritage resources may have already been formally identified, others may be identified through screening and evaluation. At this time, it is not clear whether the Project could impact any know (i.e., previously recognized) or potential cultural heritage resources and/or cultural heritage landscapes. MCM anticipates a likelihood of effects.</p> <p>While the key issue is common for project activities located in provincially owned or controlled lands, the identified provincial heritage property is unique to this Project. MCM notes that the Project area seems to have high potential for cultural heritage resources that may be of interest of Indigenous peoples and non-indigenous people.</p>	<p>22(1)(c) of the Impact Assessment Act.</p> <p>MCM understands that the proposed process is within provincial Crown lands, and Compliance with the PHP S&amp;Gs does not substitute for Indigenous-led review.</p> <p>Conclusions regarding cultural heritage value, impact determinations, and mitigation effectiveness are preliminary and may be revised based on information shared by Indigenous engagement.</p>	<p>Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations (MS-WTFNs) have shared their knowledge and can contribute to the identification of cultural heritage resource. On table 31, Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations (MS-WTFNs) identified a list of Real and Potential Adverse Impacts and Effects on Indigenous Cultural Landscapes and Places of Cultural and Spiritual Significance. MCM notes that OPG has yet to fulfill its responsibilities under the Ontario Heritage Act.</p> <p>Indigenous communities may have knowledge that, and we suggest that any engagement with Indigenous communities includes a discussion about known or potential cultural heritage resources that are of value to them.</p>	<p>- Confirm information on known or potential built heritage resources and cultural heritage landscapes for the entire Project area, including the recognition of Wesleyville Village as a provincial heritage property and its Statement of Cultural Heritage Value.</p> <p>- Describe whether further technical cultural heritage studies need to be completed to identify, evaluate and assess potential project impacts, including the timing and sequence, as appropriate.</p> <p>-Reference the PHP S&amp;Gs and OPG's responsibilities as a prescribed public body</p> <p>-Refer to OPG's Heritage Identification and Evaluation Process.</p> <p>-Include a map depicting the known provincial heritage property's boundaries within and adjacent to the Project study area.</p>	<ol style="list-style-type: none"> <li>1. <u>Describe the existing baseline cultural heritage conditions within</u> the study area by identifying all known or potential built heritage resources and cultural heritage landscapes, including a historical summary of the study area. OPG's Heritage Identification and Evaluation has adopted MCM screening checklist that may assist with this exercise: (<a href="#">Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes</a>).</li> <li>2. <u>Identify preliminary potential project-specific impacts</u> on the known and potential built heritage resources and cultural heritage landscapes that have been identified. The report should include a description of the anticipated impact to each known or potential built heritage resource or cultural heritage landscape that has been identified.</li> <li>3. <u>Recommend measures to avoid or mitigate potential negative impacts</u> to known or potential built heritage resources and cultural heritage landscapes. The proposed mitigation measures are to inform the next steps of project planning and design.</li> </ol> <p>MCM recommends that the Cultural Heritage Report is carried out so that step 1 described above is undertaken early in the planning process. Then, steps 2 and 3 can be undertaken once the preferred alternatives have been selected.</p> <p>Cultural Heritage Reports will be undertaken by a qualified person who has expertise, recent experience, and knowledge relevant to the type of cultural heritage resources being considered and the nature of the activity being proposed. We suggest that the MoU with the MS-WTFNs on how their information can be used and considered in the context of the integrated assessment be shared with qualified persons undertaking any technical cultural heritage studies.</p> <p>Community input should be sought to identify locally recognized and potential cultural heritage resources. Sources include, but are not limited to, municipal heritage committees, historical societies and other local organizations.</p>

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Comment ID	a) Key issue	b) Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Impacts on Indigenous Peoples and their rights	e) Means for issue resolution	f) Additional information from the proponent
MCM-2	<p>Project Activities and Components may impact on <b>archaeological resources</b> that are of interest of Indigenous peoples and non-Indigenous people.</p>	<p>MCM has an interest in any project components and activities that may impact archaeological resources through ground disturbing activities including site preparation, construction, bore-hole drilling, or land clearing or land/in-water/shoreline alterations.</p> <p>Project activities may physically disturb or alter Indigenous archaeological resources resulting in adverse effects to the physical and cultural heritage of Indigenous peoples.</p>	<p>Physical and cultural heritage of Indigenous peoples and non-indigenous peoples, including archaeological resources, built heritage resources, cultural heritage landscapes and places of cultural, spiritual, or historical importance.</p>	<p>Ontario Heritage Act, Part VI Among other provisions, the act makes it illegal for anyone but a licensed archaeologist to knowingly disturb an archaeological site.</p> <p>Ontario Heritage Act, Part III.1, section 25.2.</p> <p>As this project is within lands owned or controlled by OPG, the Standards and Guidelines for Conservation of Provincial Heritage Properties (PHP S&amp;Gs) apply.</p> <p>In compliance with the PHP S&amp;Gs, OPG Heritage Identification and Evaluation (I&amp;E) process was approved by MCM. We note that archaeological resources may be evaluated for their cultural heritage value or interest, either itself as a site or as a heritage attribute within a broader property.</p> <p>MCM anticipates a likelihood of effects.</p> <p>The key issue is common for project activities located in provincially owned or controlled lands. MCM notes that the Project area seems to have high potential for cultural heritage resources that may be of interest of Indigenous peoples and non-indigenous people.</p>	<p>Archaeological assessments are material to federal decision-making where project activities may result in adverse effects on Indigenous peoples, including effects on physical and cultural heritage, as described in Section 22(1)(c) of the Impact Assessment Act.</p> <p>Compliance with <i>Standards and Guidelines for Consultant Archaeologists</i> (MCM, 2011) and entry of reports into the Ontario Public Register of Archaeological Reports does not replace Indigenous-led review.</p>	<p>As a best practice, archaeological assessments prepared for the project shall be circulated to and reviewed by Indigenous communities, including Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations (MS-WTFNs).</p> <p>MCM notes that Provincial compliance alone does not satisfy Indigenous review requirements.</p> <p>Please note that engagement by archaeologists under the Standards and Guidelines for Consultant Archaeologists, during the archaeological assessment process may provide Indigenous communities with the opportunity to provide information and identify concerns at an early stage, prior to any consultation that may be required on any subsequent Crown decisions. On a practical basis, this engagement may support the Crown in meeting its duty to consult on these subsequent decisions. However, engagement under the S&amp;Gs by a licensed archaeologist is not enough by itself to demonstrate the Crown's duty to consult has been met.</p>	<p>MCM can confirm that the following assessments have been initiated:</p> <ul style="list-style-type: none"> <li>• Stage 1&amp;2 Archaeological Assessment (under Project Information Form (PIF) number P327-0082-2024) of a portion of the west project area.</li> <li>• Stage 1 Archaeological Assessment (under PIF number P208-0409-2025).</li> <li>• Stage 2 Pedestrian Survey Archaeological Assessment (under PIF number P311-0386-2025).</li> <li>• Stage 2 Borehole Area-Specific Archaeological Assessment (under PIF number P208-0438-2025).</li> <li>• Marine archaeology licence #2025-46, which has been renewed to continue work in 2026.</li> </ul> <p>All archaeological assessment reports have yet to be submitted to MCM.</p> <p>MCM database for archeological sites (GIS portal) currently shows 7 archaeological sites within the Project area and several documented archaeological sites adjacent to the study area.</p> <p>The Initial Project Description should properly describe due diligence and include the screening checklist <i>Criteria for Evaluating Marine Archaeological Potential</i> (if shoreline or in-water works are proposed).</p> <p>The Initial Project Description should:</p> <ul style="list-style-type: none"> <li>- better describe the cultural heritage resources, including archaeological sites.</li> <li>- include the status of archaeological assessment(s) and inform the Project Identification Number (PIN) of the associated archaeological assessments.</li> <li>- include whether the project could impact on marine (or underwater) archaeological resources</li> <li>- describe whether further archaeological assessment will be undertaken and the timing or any required archaeological assessment</li> </ul>	<p>We suggest that the MoU with the MS-WTFNs on how their information can be used and considered in the context of the integrated assessment be shared with the licensed archaeologists.</p> <p>We recommend that the licensed archaeologist submit the report to MCM prior to the issuance of the notice of completion.</p> <p>Please note that archaeological concerns have not been fully addressed until reports have been entered into the Ontario Public Register of Archaeological Reports ('the Register') where those reports recommend that:</p> <ol style="list-style-type: none"> <li>1. the archaeological assessment of the project area is complete and</li> <li>2. all archaeological sites identified by the assessment are either of no further cultural heritage value or interest (as per Section 48(3) of the Ontario Heritage Act) or that mitigation of impacts has been accomplished through excavation or an avoidance and protection strategy.</li> </ol> <p>Approval authorities and/or proponents should wait to receive the MCM's written confirmation that the archaeological assessment report(s) has been entered into the Register before issuing a decision or proceeding with any ground disturbing activities. The letter will also indicate either that there are no further concerns for impacts to archaeological resources or articulate next steps to mitigate any concerns.</p> <p>Proponents must follow the recommendations of the archaeological assessment report(s). MCM recommends that further stages of archaeological assessment (if recommended) be undertaken as early as possible during detailed design and prior to any ground disturbing activities.</p> <p>MCM recommends that the Impact Statement:</p> <ul style="list-style-type: none"> <li>• provide the conclusions and recommendations of the archaeological assessment(s) undertaken to date</li> <li>• include the status of archaeological assessment(s) e.g., if it has been entered into the Ontario Public Register of Archaeological Reports</li> <li>• describe whether further archaeological assessment will be undertaken and the timing or any required archaeological assessment</li> </ul>

New Nuclear at Wesleyville Project

Comment ID	a) Key issue	b) Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Impacts on Indigenous Peoples and their rights	e) Means for issue resolution	f) Additional information from the proponent
							- include commitments that should archaeological resources be uncovered during construction and operation. - Refer to OPG's Heritage Identification and Evaluation Process.	