

**Enclosure 1: Provincial Authority Advice Record – Ontario Pumped Storage Hydropower Project**

Please submit the completed form by **April 6, 2026**, to [Nottawasaga@iaac-aeic.gc.ca](mailto:Nottawasaga@iaac-aeic.gc.ca).<sup>1</sup>

<b>Submission Date</b>	April 2, 2026
<b>Ministry/Organization</b>	Ministry of Natural Resources
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**Provincial frameworks and opportunities for cooperation**

1. Describe any provincial regulatory frameworks that apply to the project (e.g., permitting, environmental assessment or registrations, compliance limits, land use policies, contractual agreements), including:
  - a) the project activities and locations to which the framework applies (considering the federal land boundary as well as multiple transmission line scenarios);
  - b) the environmental components or pathways of effect considered within the framework;
  - c) related policies or guidance documents;
  - d) any technical reports or special information required from the proponent;
  - e) any Indigenous or public consultation requirements, timelines, and participant funding;
  - f) any potential opportunities to coordinate regulatory requirements (simply ideas for further exploration), to avoid duplication, simplify steps for participants, or remove time lags; and
  - g) any known obstacles to reaching a decision under the framework (e.g., lack of information, unacceptable effects that may influence project design) and next steps to resolve issues.

**Public Lands Act (PLA)**

**Lower Inlet/Outlet Structures**

- Based on the Initial Project Description (IPD), the proposed lower inlet/outlet structure would require occupational authority under the PLA (e.g. Land Use Permit, Crown Easement). The Ministry would need an [Application for Crown Land](#), which should include, but is not limited to, a detailed site plan and project description outlining the purpose, design, construction method, potential environmental concerns and mitigation measures. **Please update Table 5-2 to include:**

Legislation	Agency	Permit, Approval or Authorization	Project Related Activity
Public Lands Act	MNR	Occupational Authority (O. Reg. 161/17)	Required for the construction and placement of infrastructure on Crown land (i.e. lakebed).

- The Ministry may require comments from other agencies when reviewing an application (e.g. Fisheries and Oceans Canada (DFO)). There would be survey requirements under a Crown Easement.
- Applicable policies and procedure documents may include:
  - [Application review and land disposition process policy | ontario.ca](#)
  - [Administrative fees for public land transactions | ontario.ca](#)
  - [Appraisal and valuation of public lands - policy | ontario.ca](#)
  - [Appraisal and valuation of public lands - procedure | ontario.ca](#)
  - [Crown land rental policy | ontario.ca](#)
  - [Easements \(Grants of\) | ontario.ca](#)

<sup>1</sup> Advice provided to IAAC may be posted on the Canadian Impact Assessment Registry Internet Site or otherwise made available to the public upon request.

- TC Energy is responsible for applying for PLA authorization(s) from MNR (e.g., dispositions of Crown resources). Dispositions are projects that are subject to screening under [MNR's 2024 Class EA for Resource Stewardship and Facility Development Projects](#) (Class EA RSFD). MNR may delegate procedural aspects of the Class EA RSFD (e.g., preparing the project description, consulting with the public) to the disposition applicant. Once MNR receives a complete application for Crown land, the applicant would prepare a project description scoped to the disposition(s) of Crown resources. The screening process considers other agency approvals and mitigation strategies when assessing a range of environmental effects. Projects screened to a Category A are exempt from the Environmental Assessment Act and have no further requirements. Category B and C projects have public consultation and evaluation requirements. Both Category B and C processes include two 30-day public notification periods and an additional 30-day waiting period prior to issuing the Statement of Completion. In a Category C process, there is an additional requirement to prepare an Environmental Study Report. **Please update the text in Section 5.2.1 using the information in this paragraph to more accurately reflect the Class EA RSFD process. In particular, please note that there are no Category D projects in MNR's 2024 Class EA RSFD.**
- There may be opportunities to coordinate requirements of the Impact Assessment process with the Class EA RSFD. One opportunity is for MNR to incorporate information from the Impact Assessment process into the Class EA RSFD screening, which considers available technical studies, other agency approvals and mitigation measures. There may be other opportunities, such as aligning public consultation comment periods, that MNR is open to discussing with IAAC and TC Energy as part of the Cooperation Plan during the Impact Assessment process.
- Information on the Crown's Duty to Consult is provided below.

#### Stayner Transmission Connection Option

- If the transmission line is being proposed on the bed of the lake, it is likely that it will require occupational authority under the PLA. Based on information in Section 3.1.8 the IPD, the Ministry will need more information on the ownership and responsibility for the operation of the transmission connection to determine the appropriate approvals.
- The Ministry may require comments from other agencies when reviewing an application (e.g. the local municipality, Fisheries and Oceans Canada (DFO)).
- Applicable policies and procedure documents may include:
  - [Application review and land disposition process policy | ontario.ca](#)
  - [Crown Land Management Policies: Utility corridors on public land - policy | ontario.ca](#)
  - [Utility corridors on public land - procedure | ontario.ca](#)
  - [Administrative fees for public land transactions | ontario.ca](#)
  - [Appraisal and valuation of public lands - policy | ontario.ca](#)
  - [Appraisal and valuation of public lands - procedure | ontario.ca](#)
  - [Crown land rental policy | ontario.ca](#)
  - [Easements \(Grants of\) | ontario.ca](#)
- Our understanding is that the transmission line portion of the project will be undergoing the Class EA for Transmission Facilities (Class EA for TF). MNR may participate in the Class EA for TF to ensure our Ministry's interests are considered. In this situation, MNR would not need to screen dispositions of Crown resources associated with the transmission line under the Class EA RSFD. However, MNR will only proceed with the disposition if the applicant provides written proof (e.g., a letter) outlining how Environmental Assessment Act requirements were met. Refer to Section 2.6 of MNR's Class EA RSFD for information on integration with other Environmental Assessment Act coverage.
- Information on the Crown's Duty to Consult is provided below.

#### Potential Marine Access (dock)

- If a dock is being considered, it is likely it would require occupational authority under the PLA. However, more information is needed to determine this and the type of approval that may be required. The Ministry would need more information, including, but not limited to, the design, size, and whether it will be temporary or permanent.
- Applicable policies and procedure documents may include:
  - [Application review and land disposition process policy | ontario.ca](#)

- [Administrative fees for public land transactions | ontario.ca](#)
- [Appraisal and valuation of public lands - policy | ontario.ca](#)
- [Appraisal and valuation of public lands - procedure | ontario.ca](#)
- [Crown land rental policy | ontario.ca](#)
- If occupational authority is required under the PLA, the disposition of Crown resources to authorize the in-water dock structure would be subject to screening under MNR's Class EA RSFD. Once a complete application and project description is received, MNR would screen the dock and the lower inlet/outlet structures as one project and consider the aggregate effects of both dispositions. Please see above section on the lower inlet/outlet structures for more details on Class EA RSFD requirements and opportunities for coordination.
- Information on the Crown's Duty to Consult is provided below.

#### **Lakes and Rivers Improvement Act (LRIA)**

- Based on the information in the IPD, it is likely that no approval is required under the LRIA for this project.

#### **Fish and Wildlife Permitting**

##### **License to Collect Fish for Scientific Purposes (LCFSP) – In-Water Works**

- Authority to issue a LCFSP is set out in the Ontario Fisheries Regulations, 2007 under the federal Fisheries Act.
- To date, LCFSPs have been issued for initial fish community assessments in support of the project. A LCFSP would also be required for any future pre-construction fisheries assessment surveys.
- A LCFSP would also be required to allow for fish salvage and relocation if required during in-water infrastructure work. To issue this licence, MNR requires information from the proponent on the salvage and release sites (UTM coordinates and mapping), as well as the salvage method (e-fishing, dip nets, etc.) and equipment being used.
- Public engagement/consultation is not formally conducted for this type of licence.
- MNR is the lead agency for setting timing guidelines for work in and around water. When multiple agency approvals are given for a single project, the in-water work timing guidelines will be given in the MNR permit and referenced in the other authorizations or approvals. More information on in water timing windows is available here [In-water work timing window guidelines | Ontario.ca](#)
- More information on how to apply for a LCFSP can be found here: [Licence to collect fish for scientific purposes | ontario.ca](#)
- Information on the Crown's Duty to Consult is provided below.

##### **Wildlife Scientific Collector's Authorization (WSCA) – On-Land Construction Activities and In-Water Works**

- Authority to issue a WSCA is set out in the *Fish and Wildlife Conservation Act (FWCA)*.
- A WSCA would be required to allow for wildlife salvage and relocation during on-land construction activities and in-water works.
- Public engagement/consultation is not formally conducted for this type of authorization
- To issue this authorization, MNR requires information from the proponent on the salvage and release sites (UTM coordinates and mapping), as well as the salvage method (netting, pit-fall traps, etc.), equipment being used, and proposed timing of salvage/release.
- More information on how to apply for a WSCA can be found here: [NRIP](#)
- Information on the Crown's Duty to Consult is provided below.

#### **Oil, Gas and Salt Resources**

- Oil, gas or salt wells are regulated under the *Oil, Gas and Salt Resources Act*, and the supporting regulations and operating standards. To help determine the presence of petroleum wells within the proposed project area, basic mapping information can be found through the [GeoHub](#) portal or the Ontario Oil, Gas and Salt Resources Library. (<https://www.ogslibrary.com/>).

- MNR understands that TC Energy is in contact with Petroleum Operations Section ([POSRECORDS@ontario.ca](mailto:POSRECORDS@ontario.ca)) and licences have been issued under the *Oil, Gas and Salt Resources Act* for the offshore geotechnical program.
- MNR also understands that it hasn't been determined if any of the project components in Georgian Bay will be subject to the *Oil, Gas, and Salt Resources Act*, as the depth of the proposed project components is significantly different than those associated with the offshore geotechnical program.

### **The Crown's Duty to Consult**

- MNR would like to work closely with IAAC and TC Energy as engagement with Indigenous communities is undertaken to understand the process, as MNR will be relying on the consultation completed through the Impact Assessment process to the extent possible to meet the Crown's Duty to Consult for MNR permits and approvals. The Ministry retains the right to undertake additional consultation where necessary.
- MNR notes that the Indigenous engagement information provided to date identifies the communities that MNR would typically engage with when consultation is owed for this geographic area. The project is located within Treaty 18, Saugeen Ojibway Nation (SON) territory, Métis Nation of Ontario (MNO) Region 7, the Huron-Wendat Nation's primary archaeological interest area, and the traditional territory of the Williams Treaties First Nations.
- MNR encourages TC Energy to continue consultation efforts with communities that have expressed interests or concerns regarding the project. We understand that final consultation records will be available for review when MNR-specific applications are submitted. Our comments at this time are preliminary and based on currently available project information and MNR's responsibilities to meet the Crown's Duty to Consult under the PLA and the FWCA.
- MNR's general practice is to engage directly with communities that are determined to be owed consultation. The consultation records indicate ongoing engagement with the Chippewa Tri-Council. While MNR is supportive of this approach, we recommend obtaining confirmation from each of the three communities (Beausoleil First Nation, Chippewas of Georgina Island First Nation, and Chippewas of Rama First Nation) either that consultation may be conducted through the Tri-Council or that consultation undertaken through the Tri-Council satisfies their individual requirements. To MNR's knowledge, there has been no formal indication that these communities wish to be consulted collectively.

## **Potential effects of the project and related effects management**

2. Identify any potential effects of the project related to your mandate or areas of expertise, as well as the project component or activity that may cause the effect, and describe any:
  - a) applicable provincial oversight, frameworks, policies, or guidance, including typical environmental outcomes achieved (e.g., specific criteria to be met, general policy intent, or purpose of legislation);
  - b) common, proven, or well-understood mitigation measures; or
  - c) commitments that can be made by the proponent to build confidence about the proposed effects management strategies.

### **Fish and Fisheries Management**

Fisheries management in Ontario falls under MNR's mandate, as outlined in [Ontario's Provincial Fish Strategy: Fish For The Future](#), where one of the *Strategy's* primary purposes is to improve the conservation and management of fisheries in Ontario and the ecosystems on which fish communities depend. MNR's Upper Great Lakes Management Unit – Lake Huron (UGLMU), manages the aquatic resources in the Ontario waters of Lake Huron using an ecosystem approach.

As described in Section 1, MNR has a regulatory role in terms of permitting baseline fisheries assessments and potential fish salvage and relocation during in-water infrastructure work (i.e., Licence to Collect Fish for Scientific Purposes). Potential MNR authorization(s) under the *Public*

*Lands Act* for the lower inlet/outlet structures and marine access (dock) would include considerations for impacts to fish through steps in the process such as the Class EA RSFD screening and seeking DFO comments on the application(s).

### General Comments

MNR notes that without a detailed project design, it is difficult to provide a thorough review and considerations for identifying and mitigating impacts on fish and fisheries management. Lack of confirmation on infrastructure design, construction methodologies, and appropriate mitigation plans reduces the ability to provide specific considerations without speculation. For MNR to provide detailed comment on the potential for impacts to fish, more information is needed, including but not limited to the following:

- Mesh size of lower inlet/outlet structure screens
- Lower inlet/outlet flow dispersion measures (i.e., rate of flow, timing for full reservoir discharge)
  - Reservoir fill/empty rate
- Erosion and sediment control measures to manage runoff and dewatering effluent
- Mitigation strategies for Reservoir water temperature effects
  - *“Operational maneuvering to circulate water” (IPD, p. 168)*
  - *“Water in the Reservoir will be cycled on a regular basis during operation (i.e., typically once every 24 hours)” (IPD, p. 207)*
  - What is the typical time between low and high demand energy periods? How will this impact the cycling of water in the Reservoir and temperature differential (Delta T)?
- Pre-construction environmental management plans (i.e., low impact techniques)
  - *As project design progresses, “appropriate mitigations to be proposed in an environmental management plan.” (IPD, p. 181)*

Preliminary comments on impacts to fish and fisheries management based on the information in the IPD are provided below:

### Fisheries assessment in Georgian Bay

- MNR has issued several LCFSP's to North/South Consultants Inc. over the past few years for the purpose of collecting fish community information for the project. During initial application reviews in 2020, MNR identified several gaps in the proposed sampling plans (Appendix A-C), including:
  - Lack of fisheries assessment work where water will be withdrawn and expelled (i.e., lower inlet/outlet structure).
  - Spatial scope of onshore assessment program being limited to two small areas free of unexploded ordnances (UXO).
  - Use of large mesh gillnet work in offshore regions. This protocol is typically used by UGLMU to capture Lake trout and Lake whitefish that are on-shore to spawn. The proponent was advised that conducting this netting offshore would not confirm spawning activity or spawning locations and would likely kill fish needlessly as a result.
  - Trawling and hydro-acoustics work not being conducted in tandem with each other in the same sampling period/year.
- MNR is aware that assessment work by the consultant was restricted by the risk of unexploded ordnance (UXO) and continues to recommend that an examination of the lakebed would influence what fisheries work could be safely conducted in the proposed location, rather than in adjacent areas. The sampling plans under the issued LCFSP's have not been adapted and no additional UXO clearance has been conducted to date. These issues limit the understanding in the Hazard Zone where fish community impacts are most likely to be experienced due to the proposed project.

### Impingement and entrainment of fish at the lower inlet/outlet structure

- The preliminary project boundary is proposed within a geographical area that has historical record of Lake whitefish and Lake trout spawning and nursery habitat. Larval fish are the life stage most likely to be impinged and entrained in the proposed facility. Potential impacts due

to impingement and entrainment of fish at the lower/inlet outlet structure is addressed in the IPD in the following statements:

*“Fisheries studies conducted since fall 2020 have not identified suitable spawning habitat for species such as Lake Whitefish and Lake Trout in the immediate vicinity of the Lower Inlet/Outlet Structure.” (IPD, p. 178).*

*“Adult Lake Whitefish are at low risk of impingement and entrainment at the screened ports based on their size and their ability to swim free of the Lower Inlet/Outlet Structure. Larval studies 2021-2024 have identified very few larval Lake Whitefish in the vicinity of the Lower Inlet/Outlet Structure.” (IPD, p. 1788).*

- It is MNR’s perspective that the IPD does not provide enough details at this stage to confirm or refute the potential impact on Lake whitefish and Lake trout populations in the vicinity of the site. Determining the risk of impingement and entrainment at the screened ports is hindered by the lack of clarification on mesh size and the rate of flow. The limited spatial scope of on-shore assessment also limits a comprehensive understanding of nearshore fish spawning activity for Lake whitefish and Lake trout.
- MNR recommends that all depths need to be surveyed for larval fish in the proximity of the lower inlet/outlet infrastructure, prior to determining the impacts of the project to Lake whitefish and Lake trout populations.

#### **Stayner transmission connection option**

- The lakebed transmission option poses a higher risk to fish than a land-based Meaford transmission connection, as it could lead to changes in fish behaviour because of shifts in electromagnetic fields in Nottawasaga Bay. Electromagnetic fields reduction methods are not discussed in detail in the IPD.
- Initial designs of the transmission cable (shared in previous correspondence) cross known movement corridors of Lake whitefish and Lake sturgeon. Buried high-voltage cables have the potential to alter access to key spawning and nursery grounds on the southern edge of Nottawasaga Bay. This includes the Nottawasaga River, which empties into Nottawasaga Bay in the Town of Wasaga Beach (location of parcel of land owned by TC Energy for cable-landing site), which provides significant inland spawning habitat for lake sturgeon.
- Recognizing that there isn’t a lot of information available at this time about the transmission connection options, MNR recommends that addressing the following unknowns would help build confidence about the proposed effects management strategies:
  - How will a subsurface transmission cable be constructed and what impact will it have on the lakebed? (e.g., tunnel boring, lakebed excavation)
  - Will Georgian Bay sediment be disturbed and present in the water column?
  - Will the electromagnetic field above the lakebed be disrupted and alter fish movement patterns?

#### **Potential “Bird Feeder” effect – lower inlet/outlet structures**

- Changes in currents during operations could lead to a potential attractant effect on fish populations from increased food resources (i.e., zoo- and phytoplankton).
- The proposed project may increase interaction and/or conflict with the recreational fishery, as anglers target fish aggregations (i.e., down rigging). Targeting of fish in the vicinity of the lower inlet/outlet structure may cause gear entanglement (i.e., ensnared on project infrastructure).
- More information on flow rates from the lower inlet/outlet structure and reservoir cycling would help with assessing the effects of the project on broader food web dynamics.

#### **Infrastructure biofouling prevention/mitigation – lower inlet/outlet structures**

- The IPD provides no mention of prevention and/or mitigation measures for biofouling of submerged infrastructure, particularly the lower inlet/outlet ports above the lakebed.
- Invasive Dreissenid mussels and Cladophora blooms are very common on the lakebed across Georgian Bay and have high potential to impede project operations through physical clogging of water intakes/outtakes.

- Further information on lower inlet/outlet structure design options would help assess the potential impact of biofouling on fish and identification of mitigation measures.

### **Influence of reservoir outflow on Georgian Bay water temperature (see Section 3 below)**

#### **Watercourse crossings – on-land portion of the project**

- There is the potential for temporary and permanent impacts of the project (e.g., roads, culvert, temporary access, dewatering) to migratory salmonids and sensitive cold-water species like Brook Trout.
- The IPD doesn't provide enough information on location of watercourses and whether sampling or observations took place to determine impacts, aside from mention of one prominent watercourse:

*“Initial surveys were conducted on a prominent watercourse flowing from the north of the Reservoir in a southeasterly direction to Georgian Bay, which transects the general area of the Pumped Storage Facility. The stream is predominantly a high gradient waterway with a rocky substrate. Adult and juvenile Rainbow Trout were present in the lower reaches, and adults were observed spawning at sites downstream of 4 CDTC.” (IPD, p. 174).*

- More information on the existing watercourses in the project area, stream assessments completed and the resulting data, would help support the identification of impacts and mitigation strategies for effects on fish.

### **Natural Heritage Information**

#### **Wetlands**

Impacts to natural heritage features such as wetlands are considered in MNR decision-making, including as part of the RSFD Class EA screening for MNR dispositions under the PLA.

As of January 1, 2023, MNR no longer reviews and confirms wetland evaluations. MNR's role with respect to wetland evaluation includes providing the provincial framework under which wetlands in Ontario are evaluated for significance and uploading digital wetland boundary mapping and wetland status into the Geospatial Ontario database.

- The proposed project intersects with one or more coastal wetlands, along the shoreline of Georgian Bay. Great Lakes coastal wetlands provide significant biological functions such as breeding, nursery, and feeding grounds for many species of fish and wildlife. They are also home to many locally and/or regionally rare or significant species of flora and fauna.
- Some or all of these wetlands may not have been previously evaluated under Ontario's Wetland Evaluation System (OWES). MNR encourages the evaluation of wetlands using OWES. This scientific and standardized process identifies, defines, and measures wetland functions and values, supporting the assessment of potential impacts to these ecological features and functions. For more information on wetland evaluations and the provincial framework for wetland evaluation, please visit [Wetlands evaluation | ontario.ca](https://www.ontario.ca/wetlands).
- Wetland data collected as part of OWES evaluations and/or other field work should be circulated to MNR, as this data is assessed during the RSFD Class EA screening and application review process for authorizations under the PLA. Efforts should be made to avoid or minimize impacts to coastal wetlands.

#### **Significant Wildlife Habitat**

MNR encourages that project study areas which may contain significant wildlife habitat be investigated for its presence or absence. Significant wildlife habitat may include features such as seasonal concentration areas for wildlife species, rare vegetation communities, specialized habitats of wildlife, habitats of species of conservation concern, and animal movement corridors.

Please note, relying on online mapping tools only may not accurately reflect the presence or absence of significant wildlife habitat within the project study area. Surveys or additional site level assessments are often required to confirm the presence or absence of natural heritage features and values.

The IPD identifies a significant deer yard within the project site (IPD, pg 191). MNR recommends assessing any potential disruption resulting from habitat clearing and/or deer population movement during the anticipated 5-year construction timeline.

The following technical guides are the province's best available information to support identification of significant wildlife habitat in different landscapes:

- [Natural Heritage Reference Manual, 2005](#)
- [Significant Wildlife Habitat Technical Guide, 2000](#)
- [Significant Wildlife Habitat Criteria Schedules for Ecoregion 6E, January 2015](#)
- [Significant Wildlife Habitat Mitigation Support Tool, Version 2014](#)

### Significant Woodlands

MNR encourages that project study areas containing wooded areas be investigated for the presence of significant woodlands. Significant woodlands are areas that are ecologically important in terms of features such as species composition, age of trees and stand history; functionally important due to their contribution to the broader landscape; or economically important. Local planning authorities are responsible for identifying significant woodlands in accordance with criteria established by MNR's [Natural Heritage Reference Manual, 2005](#).

3. To generate focused feedback from federal regulators, IAAC prepared a preliminary list of potential effects that are likely or unlikely to be key issues for a federal impact assessment (**Appendix**), should an assessment be required. Optionally, and as it relates to your mandate, provide any feedback on the list such as relevant provincial regulatory oversight or local knowledge. You may suggest other issues for consideration.

**Unlikely Key Issue:** “changes to water quality in the Georgian Bay from reservoir outflow, because the reservoir will be lined with an impermeable layer and water will not be held in the reservoir for prolonged periods”

- The influence of the reservoir outflow on Georgian Bay water temperature and resulting impacts on fish should not be downplayed given the uncertainty over the mitigation strategies for reservoir temperature effects.

The IPD refers to “operational maneuvering” and regular reservoir cycling practices; however, it does not provide explanatory details. Residence time of the water in the reservoir (given low and high energy demand periods) and monitoring of temperature differential (Delta T) are not described. These factors may influence the degree of impact operations may have on the surrounding fish community.

### **Appendix<sup>2</sup>**

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

- Effects to fish and fish habitat
  - during operations from interactions with the inlet/outlet structure such as impingement and entrainment, changes in lake flow patterns, and turbidity, which may require special attention in ongoing project design
  - during construction of the inlet/outlet structure from lake-bed disturbance and turbidity, unless this is easily managed with well understood mitigation
- Effects to the environment on federal lands
  - including federally listed species at risk, wetlands, and riparian environments that provide special habitat or functions, from construction activities and footprint location, some of which could require offsetting and special attention in ongoing project design
  - if soil contaminants are identified in overburden materials to be disturbed and/or relocated, potential changes to groundwater and surface runoff quality, to inform site specific stormwater management strategies
- Impacts to the physical and cultural heritage of Indigenous peoples and sites of archaeological importance, with a focus on potential archaeological resources on land or water, and species of cultural importance (e.g., black bear)
- Impacts to the economic conditions of Indigenous Peoples
- Effects to people from activities on federal lands, such as dust and noise interactions with base personnel, to help DND identify suitable mitigation and monitoring for any conditions it may place on a land use decision

<sup>2</sup> To generate focused feedback and dialogue, IAAC has prepared this preliminary list (as of October 1, 2025) based on limited information prior to receipt of the Initial Project Description. It may change based on input received from federal and provincial authorities, Indigenous communities, and the public.

- Positive effects of the project, including
  - economic benefits for Indigenous groups
  - contributions to Canada's ability to meet its climate change commitments for long-term targets (i.e., 2050) and displace greenhouse gas emissions in the energy sector
  - contributions to sustainability including local socio-economic benefits and Indigenous economic reconciliation

IAAC has identified the following topics as **unlikely key issues** for the impact assessment because the effects are either immaterial to decision-making, effectively managed by other regulatory mechanisms, or have well understood mitigation measures:

- Effects to fish and fish habitat from
  - loss of habitat from lake-bed footprint, which is expected to be routinely managed through an authorization under the *Fisheries Act*, if needed
  - changes to water levels in the Georgian Bay, which are anticipated to be negligible based on the volume of water taken relative to the volume in the lake
  - changes to water quality in the Georgian Bay from reservoir outflow, because the reservoir will be lined with an impermeable layer and water will not be held in the reservoir for prolonged periods
- Effects to migratory birds from construction activities due to well-understood mitigations measures, and regulations under the *Migratory Birds Convention Act*
- Effects to the environment on federal lands, including wildlife and vegetation that are not federally listed species at risk, as population-level effects are unlikely
- Effects on Indigenous peoples':
  - ability to access lands and resources for traditional purposes (harvesting, navigation), as IAAC understands that access to the surrounding land and water is already restricted by DND (apart from any land use near the potential transmission lines outside of the restricted use areas)
  - use of fish for traditional or commercial purposes because population-level changes to fish in the Georgian Bay are not anticipated; should fish population changes be a concern, effects to fishing would be considered
- Effects to the health, social and economic conditions of non-Indigenous peoples resulting from activities carried out on federal lands, including
  - changes to commercial and recreational use of water in the Georgian Bay as public access to the surrounding water is already restricted
  - changes to the visual environment as the project is primarily obscured from view
  - changes to drinking water quality from reservoir outflow because bay water will move in and out without alteration and an impermeable layer in the reservoir will prevent seepage
  - non-Indigenous cultural heritage resources due to well established protocols set by provincial standards, and regulatory oversight off-federal lands
  - impacts to the operations of the Canadian Armed Forces from construction and operation logistics, as DND can manage these in parallel through its Operational Impact Assessment
  - changes to socio-economic conditions in Meaford from the construction workforce as the proponent will focus on local and regional workers, where possible, and is working closely with the municipal government and community service providers
  - changes in energy pricing as this will be managed by Ontario's energy contracting policies and decisions
- Contributions to Canada's ability to meet its climate change commitments for short-term targets (i.e., 2035) because the project will cause greenhouse gas emissions during construction and no further information is required to conclude the project does not contribute to Canada's short-term targets
- Contributions to Canada's ability to meet its environmental obligations as no further information is required to conclude the project does not contribute to Canada's ability to meet its environmental obligations