



**Town of Saugeen Shores**  
600 Tomlinson Drive, P.O. Box 820  
Port Elgin, ON N0H 2C0

July 7, 2025  
Bruce C Nuclear Project  
Impact Assessment Agency of Canada  
22nd floor, 160 Elgin Street  
Ottawa, Ontario K1A 0H3  
Via email: [Bruce@iaac-aeic.gc.ca](mailto:Bruce@iaac-aeic.gc.ca)

**RE: Saugeen Shores Submission to IAAC & CNSC on the Draft Tailored Impact Statement Guidelines and Public Participation Plan for the Bruce C New Nuclear Project**

Dear Sir/Madam,

Saugeen Shores is in receipt of the draft Integrated Tailored Impact Statement Guidelines (TISG) and Public Participation Plan (Plan) for the Bruce C Nuclear Project. The draft TISG and Plan for the Bruce C Project was published by the Impact Assessment Agency of Canada (IAAC) on June 12, 2025, and released for a 30-day public comment period on the same day.

The Town of Saugeen Shores (the Town) understands this is an integrated Impact Assessment process involving both IAAC and the Canadian Nuclear Safety Commission (CNSC). The Town recognizes that once finalized, IAAC will post the plans to the Registry with the Notice of Commencement, marking the start of the Impact Statement phase.

The comments below have been prepared in response to IAAC's request to receive input from the public, including local communities. It is understood that IAAC is interested in how the project could affect the community of Saugeen Shores and is seeking to understand what is important to the community as part of this process.

These comments have been endorsed by Saugeen Shores Council at the July 7, 2025, Council meeting, as their formal submission on the draft Integrated Tailored Impact Statement Guidelines and Public Participation Plan for the Bruce C Nuclear Project.

**Interest in the Project**

Saugeen Shores is the region's fastest-growing community, housing approximately 30% of Bruce Power's 4,000 plus permanent workers and 18 nuclear suppliers, with growth expected to continue. The Town is also quickly becoming a hub for innovation and a centre of excellence in the nuclear industry. The Town has a long-standing relationship with Ontario's energy sector due to its proximity to Bruce Power (nine kilometers) and as such, we are eager to assist in the success of the Bruce C Project by ensuring that our community has the necessary infrastructure and services to support it.

The Town of Saugeen Shores is a lower-tier municipal government responsible for delivering infrastructure and services including roads and bridges; sewer and water services; waste management and landfill; cemetery; fire rescue; emergency preparedness and management; land



use planning; economic development; building and by-law services; community services (including parks, recreation, arenas and pool); strategic and government relations; as well as core services such as finance, human resources and information technology.

## **Comments on the Draft Integrated Tailored Impact Statement Guidelines**

### **Section 3: Project Description**

The proponent (Bruce Power) has indicated that it will be adopting a Plant Parameter Envelope (PPE) Approach to the Project, which will incorporate bounding conditions to encompass the range of potential reactor designs. The Town looks forward to engaging with the proponent on the use of the PPE Approach, particularly with understanding the pathways of effects for each technology, including a clear description of the differences among them.

On November 25, 2024, [Saugeen Shores Town Council endorsed a resolution from Bruce County](#) regarding Municipal Support for CANDU Reactors. Of note, the resolution included the expression of support “for the continued operation, refurbishment, and expansion of the CANDU fleet in Bruce County and across Ontario.” The Town wishes to reiterate its support of the expansion of CANDU technology, particularly as it relates to the Bruce C Project.

### **Section 5: Description of Public Participation and Views**

With the provision of municipal capacity funding provided by the Bruce Power in late 2024, the Town has been able to build detailed knowledge within the organization and gather information that has, and will continue to be, utilized in the Impact Assessment process.

As a local community, the Town has a vested interest in the lands affected by the Project. The Town looks forward to continuing meaningful and regular engagement with the proponent to incorporate community knowledge and address public comments as this process advances.

### **Section 7: Assessment Methodology**

**Valued Components** (VCs) are described as aspects of the environmental, health, social, and economic conditions that may be important to you or your community. As a locally impacted community, the Town looks forward to engaging with the proponent in the selection of VCs, recognizing that they serve as focal points for the Impact Assessment and will inform conclusions in the Impact Assessment Report. Additionally, the Town appreciates that feedback collected during the Initial Project Description (IPD) public commentary period, captured in the Summary of Issues (SOI), is reflected in the rationale for inclusion of the below identified VCs.

Health, social, and economic conditions, including:

- human health and well-being;
- housing and infrastructure;
- social and community services;



- labour;
- labour and workforce availability; and
- education and training.

As **Cumulative Impacts** were one of the first areas commented upon within the Town's IPD submission, the Town appreciates that the draft TISG outlines in detail how the proponent is to conduct a cumulative impacts assessment.

In particular, the Town strongly agrees that the below project activities are to be included within the cumulative impacts assessment for the Project:

- existing Bruce A and B facilities and operations;
- current and potential Major Component Replacement projects;
- continued above ground storage of nuclear waste; and,
- large-scale battery storage facilities.

## **Section 9: Health, Social and Economic Conditions**

The Impact Agency of Canada states that Section 9 of the Integrated Guidelines presents a holistic approach to the requirements for health, social, and economic conditions of both the broad population living in the project study area (referred to as local communities).

Additionally, for the Impact Statement, the goal of Section 9 is to collect relevant baseline information, conduct effects analysis and provide potential mitigation measures as a result of local communities in the project study area.

In its submission on the IPD, the Town identified 12 areas of municipal services and infrastructure that could be affected by the Bruce C Nuclear Project. The Town was pleased to see that IAAC also recognized these 12 areas, at both the baseline and effects levels, as requirements for the Impact Statement.

Recognizing the significant investment required by local communities to ensure appropriate growth readiness for the Project, the Town was particularly pleased to see that the document identified that the Impact Statement must “describe any need for government and/or proponent expenditures for new or expanded services, facilities or infrastructure, arising out of project-related effects.”

Section 9.1.3. outlines the mitigation and enhancement measures for Health, Social, and Economic Conditions. Unlike in Section 8, where mitigation and enhancement measures are identified and outlined in each sub-section, 9.1.3 is the only area where these measures are noted. For clarity and ease of tracking, the Town suggests that mitigation and enhancements measures be clearly listed under the relevant subsections within Section 9.

The preamble to Section 9 references that “The IAA also requires the assessment of adverse effects within federal jurisdiction...,” however, Section 9.1.3 identifies impacted services that



conceivably fall within provincial jurisdiction and run counter to the above statement. The Town requests clarification on why those measures identified in 9.1.3 were included, along with their enforceability by the federal government. While the Town acknowledges that the federal government can only enforce measures within federal jurisdiction, there is still a need to clearly identify mitigation and enhancement measures for locally impacted services and infrastructure, of which many fall within provincial authority.

Additionally, the Town stresses the importance of provincial coordination in the IA process to ensure municipalities can fully enhance and mitigate the impacts on their health, social and economic conditions. Provincial capacity funding is essential for local municipalities to support community growth readiness, including required upgrades to infrastructure and services.

## **Section 12: Effects of Potential Accidents or Malfunctions**

As the Provincial Nuclear Emergency Response Plan (PNERP) has identified the Town of Saugeen Shores as a [Designated Host Community](#) with respect to the Bruce Nuclear Generating Station, the Town looks forward to continuing to engage with the proponent on all requisite emergency management planning related to the Project.

In particular, the Town looks forward to the final Impact Statement clearly identifying:

- emergency communication and public notification plans, community awareness plans and public reporting;
- describe liaison, training and continuous education plans linked to emergency preparedness; and,
- ongoing and planned outreach efforts to ensure communities understand the risks associated with this type of project.

## **Section 16: Follow-up Program**

As the Project is taking a Plant Parameter Envelope (PPE) approach, the proponent will be providing a conservative assessment of effects, considering any of the reactor technologies that may be chosen. The Town looks forward to continuing engagement with Bruce Power during project implementation, through the follow-up program, to verify the accuracy of the effects predicted in the integrated assessment and determine the effectiveness of mitigation measures.

## **Comments on the Draft Public Participation Plan**

The Public Participation Plan outlines the various ways participants may provide input and engage in the process. The following are IAAC's and CNSC's objectives for public participation throughout the integrated assessment process:

One of IAAC's and CNSC's objectives for public participation includes that participation is meaningful. This means that the public is provided with:



- opportunities to take part in the integrated assessment;
- the information they need to participate in a timely manner and in a format that is accessible; and,
- the capacity and resources to participate in an informed manner.

The Town would like to highlight the inherent difficulty of thoroughly reviewing a highly technical document, such as the draft TISG, within a 30-day commenting period, while also preparing comprehensive comments and obtaining Council feedback and endorsement. This difficulty is exacerbated by the fact that municipalities are not eligible for Participant Funding through the Impact Assessment process. In acknowledging these hurdles to meaningful participation, the Town would suggest to IAAC that they consult with the public, particularly local municipalities, on the appropriate lengths of time to review and provide informed feedback.

The Town would like to reiterate its gratitude to Bruce Power for providing initial municipal capacity funding allowing for our local community knowledge to be represented within the Impact Assessment process.

### **Summary**

The Town of Saugeen Shores appreciates the opportunity to be engaged and provide comments on the draft Integrated Tailored Impact Statement Guidelines through the federal Impact Assessment process.

The Town looks forward to continuing meaningful engagement with Bruce Power, IAAC, and CNSC by providing local community knowledge in preparation of the final Impact Statement.

Sincerely,

Luke Charbonneau, Mayor  
Town of Saugeen Shores

cc. Council, County of Bruce  
Council, Municipality of Kincardine

