



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

September 9, 2024  
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 Initial Project Description for the Bruce C New Nuclear Project**

Dear Sir/Madam,

Saugeen Shores is in receipt of the Initial Project Description (IPD) for the Bruce C Nuclear Project. The IPD for the Bruce C project was filed with the Impact Assessment Agency of Canada (IAAC) on August 1<sup>st</sup>, 2024, and released for a 30-day public comment period on August 12<sup>th</sup>, 2024. The Town of Saugeen Shores understands this is an integrated Impact Assessment process involving both the Impact Assessment Agency of Canada (IAAC) and the Canadian Nuclear Safety Commission (CNSC). The submission of the IPD formally moves the Bruce C project from the pre-planning to the planning stage of the Impact Assessment process.

The comments below have been prepared in response to IAAC's request to receive input from parties that have an interest in the project. It is understood IAAC is interested in how the project could affect the community and is seeking to understand what is important to the community. IAAC has also requested input on whether there are challenges that might prevent parties from participating in the process.

These comments have been endorsed by Saugeen Shores Council at the September 9, 2024 Council meeting, as their formal submission on the Bruce C Initial Project Description.

**Project Proposal**

Through engagement with the proponent, Bruce Power, in the pre-planning phase, as well as through the formal Impact Assessment process, it is the Town's understanding Bruce Power is proposing the site preparation, construction, operation and decommissioning of a new nuclear generating station within the existing Bruce Power nuclear power site. The Bruce C Nuclear Project proposes to provide up to 4,800 megawatt of new nuclear generating capacity for Ontario.

Bruce Power has been pro-active in engaging the Town of Saugeen Shores through the pre-planning phase of the Bruce C project. The engagement and information sharing has

been helpful to gain an understanding of the proposed project and the Impact Assessment process.

### **Interest in the Project**

Saugeen Shores is the region's fastest-growing community, housing approximately 40% of Bruce Power's 4,000 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 (22 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.

Saugeen Shores is also home to the Nuclear Innovation Institute (NII), which helps shape a nuclear industry that embraces new thinking, new technologies, and new lines of business to drive the global shift to a low-carbon future. The Municipal Innovation Council (MIC), as a Friend of the Nuclear Innovation Institute, aims to build smarter, stronger, and more resilient communities. It focuses on understanding how issues affect people and developing shared solutions to common problems.

### **Challenges to Participation in the Impact Assessment Process**

Financial resources are required to support the participation of the Town of Saugeen Shores in the Impact Assessment process for Bruce C. Saugeen Shores anticipates significant impact to its core infrastructure and services by the development of the Bruce C project. In order to assess those impacts and prepare the community to be ready for the Bruce C project, the municipality requires the necessary funding to undertake preparation work and to adequately participate in the Impact Assessment process. IAAC should take steps to ensure that municipalities have access to adequate resources in order to participate in this Impact Assessment process.

To date, it has been a burden for municipalities to be proactively engaged in the Impact Assessment process due to the lack of resources to support this activity. Work to engage in an Impact Assessment pulls staff resources away from regular municipal duties and responsibilities.

While IAAC funds public participation and the participation of Indigenous communities, it is understood that it does not fund municipal organizations to also participate in the Impact Assessment process. Stable and reliable sources of municipal capacity funding are required to facilitate municipal participation in the Bruce C project, and energy projects in general.

## **Cumulative Impacts**

The scope and scale of proposed investment in energy projects in our region demonstrates that Saugeen Shores and surrounding communities will play a central role in Ontario and Canada's clean energy future.

While it is understood the current Impact Assessment is only able to consider the potential Bruce C project, it is important for IAAC and CNSC to understand there is the potential for cumulative socio-economic impacts with multiple energy projects being proposed in the region. These projects include a potential nuclear deep geological repository, a pumped storage facility, and a large-scale battery storage facility. While comments included in this letter focus on anticipated impacts of a potential Bruce C project, the Town of Saugeen Shores is conscious of potential cumulative impacts of the scale of energy investment in the region that will need to be addressed should these projects proceed.

## **Financial Impacts**

Local municipalities need to prepare their communities for growth, infrastructure investment and demand for services that will come forward as this Project advances. The Town of Saugeen Shores will be required to make investments to support Bruce Power as an employer, their employees, and the broader community. Understanding the impact to infrastructure and demand for services tied to a potential Bruce C project is critical for Saugeen Shores to ensure the Bruce C project has a positive socio-economic impact.

Ensuring a growing and vibrant economy is a priority for all orders of government. While the Town is best suited to be the local champion for economic development initiatives, it is also restricted in its ability to support those initiatives as the primary source of funding is from municipal property tax. Municipalities in general, and especially those being asked to play a central role in Ontario and Canada's clean energy future, require greater financial resources to invest in the infrastructure and services that underpin successful economic transition to clean energy, electrification and nuclear expansion.

As the Town of Saugeen Shores works to understand the scope of infrastructure and service demands needed to support a Bruce C project, it is done while facing a lack of federal and provincial funding for infrastructure upgrades, which support Bruce Power. Currently these projects and services are largely funded from the municipal tax base of less than 17,000 residents. Investment is needed to prepare Saugeen Shores for the impacts of Bruce C and the Town will require funding from other levels of government and sources beyond municipal property tax.

Standard municipal funding methods, like Development Charges and Debt, will fall short with fast or unpredictable growth, especially given the provincially mandated Annual Repayment Limit on debt. For the investment in infrastructure to be in place in a timely manner in advance of actual residential and commercial growth related to Bruce C, using planned Development Charges and Debt as financing sources poses significant risk to the municipality's finances. This risk becomes unmanageable for the existing tax base in the context of the scale of growth contemplated by this project.

In summary, municipalities currently lack a structured framework and the necessary funding to manage the environmental and socio-economic impacts anticipated from the Bruce C project. The proponent has demonstrated the economic benefits of the project in the Initial Project Description, and yet local municipalities will struggle with the added burden of impact assessments, licensing, and support for infrastructure and service demands without sufficient monetary support beyond the current property tax base to fund them.

### **Socio-economic Impacts**

It is understood that assessing the socio-economic impact of a large-scale infrastructure project is a relatively new consideration as part of an Impact Assessment for new nuclear projects. The Town welcomes this addition to the assessment process and will actively work with the project proponent and participate in the process to inform this portion of the Impact Assessment.

As noted above, as the area's largest employer, Bruce Power and its expansion, has the potential to have a significant impact on the Town of Saugeen Shores. As the level of government that delivers infrastructure and services locally, the Town believes it is important to consider socio-economic impacts throughout the Impact Assessment process.

The Initial Project Description notes a Municipal Socio-Economic Existing Conditions Report has been completed by Bruce Power to characterize community, social, economic, and human health conditions, in addition to non-traditional land and resource use, which could experience effects as a result of the Project. Town staff participated in interviews to inform this work and considers it draft as Saugeen Shores would appreciate continued work with Bruce Power to provide feedback on the existing conditions report to ensure it accurately reflects current conditions of social, economic and human health within the municipality.

Expansion to the nuclear generating facility at Bruce Power is anticipated to create increased demand on infrastructure and services delivered by the local municipalities through the site preparation (2028-2031), construction (2031-2045) and operation (60-100 years) phases of proposed Bruce C project. The proposed Bruce C project has the potential to have a significant impact on municipal infrastructure and services, as well as broader community services delivered by other levels of government including the County and Provincial health care and education.

At a high level, it is anticipated there will be impacts from the Bruce C project for demand and investment for the following municipal infrastructure and services (Appendix A provides further details):

1. Transportation and Road Infrastructure
2. Emergency Management
3. Fire Services
4. Police Services
5. Water and Wastewater Infrastructure
6. Waste Management including Landfill

7. Community and Recreational Development
8. Land Use Planning / Housing
9. Growth Management and Infrastructure
10. Economic Development / Workforce Development and Attraction
11. Healthcare – including Physician Recruitment
12. Traffic and Safety

Other public infrastructure and services not delivered by the local municipality that are anticipated to be impacted may include:

- public transportation (transit)
- broadband internet and cellular coverage
- healthcare and hospitals
- public and secondary schools
- post-secondary education
- county and provincial highways
- emergency services (paramedic services)
- employment services
- housing, including market-housing and affordable community-based housing
- human (social) services
- long-term care

The infrastructure and services delivered by municipalities are critical to the success of nuclear and energy infrastructure projects.

To better understand the socio-economic impacts linked with this project, a comprehensive municipal socio-economic support study must be conducted. This study should establish workforce and population projections based on the Bruce C Project to aid in growth management, particularly for population allocation and reviewing land supply needs for both commercial and residential development. Additionally, the study should evaluate service delivery and identify infrastructure and service gaps within the municipal service framework necessary to accommodate the growth associated with the Bruce C Project. Finally, the municipal socio-economic support study should be incorporated into the Impact Assessment process to develop an overall strategy on how to best address the socio-economic impacts, engaging the proponent, stakeholders, and various levels of government.

### **Economic Development Impacts**

The Town of Saugeen Shores supports the government of Ontario's goal to electrify the economy and invest in clean energy, including nuclear. As a central part of the Clean Energy Frontier, the Town knows both the environmental and economic importance of the energy sector in the daily lives of Ontarians. Investing in a new nuclear build on the existing Bruce Power site has the potential to streamline the regulatory process as there is a high level of citizen engagement, knowledge of the industry and acceptance of large-scale energy projects due to the existing nuclear generating site.

As the largest employer in Saugeen Shores, Bruce Power has a positive economic impact across the County and Ontario. The investment from Bruce Power in a potential Bruce C Nuclear Project will provide economic stability in the region and contribute to the growth in Saugeen Shores and all of Bruce County. The proposed Bruce C Nuclear Project will help support youth retention and provide sustained well-paying jobs that will support business and the local economy well into the future. The project demonstrates the strength and specialization the region has as Ontario's Clean Energy Frontier.

Bruce Power currently supplies 30% of Ontario's electricity, and our region is being relied upon to increasingly contribute to the pressing electrification of Canadian society through major energy investments, including Bruce Power's Major Component Replacement (the largest infrastructure project in Canada) already under way. Additionally, a significant proportion of the world's supply of medical isotopes (used to sterilize equipment and treat cancer) are produced by Bruce Power. Further investment in the proposed Bruce C Nuclear Project has the potential to see the growth of medical isotope production in Saugeen Shores. Growth of the energy and medical isotope sector is strongly supported in the Town of Saugeen Shores.

### **Environmental Impacts**

It is understood that the Bruce Power site is one of the most studied and understood sites in all of Canada. The Town will review and consider environmental assessments completed through the Impact Assessment process to ensure environmental and human health is considered for the potential Bruce C project.

### **Summary**

The Town of Saugeen Shores appreciates the opportunity to be engaged and provide comments on the Initial Project Description through the formal Impact Assessment process.

Section 3.2 of the IPD "Summary of Key Interests and Issues Raised" notes what the Town would consider a preliminary Summary of the key interests and issues raised through the pre-planning engagement. The Town provides this submission to further highlight and expand on areas included in the IPD Summary and that require further analysis and refinement through the Impact Assessment process.

The Town anticipates working closely with Bruce Power, IAAC, and CNSC during the Impact Assessment process on the potential Bruce C project and is eager for productive discussions on capacity funding to support municipal participation.

Sincerely,

Luke Charbonneau, Mayor  
Town of Saugeen Shores

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

**Appendix ‘A’ – Bruce C Project Impacts: Demand / Investment Municipal Infrastructure and Services**

1	Transportation and Road Infrastructure	The Town’s Transportation Master Plan, and the current planned capital investments to implement that Plan, do not anticipate the growth that the Bruce C project will generate, including but not limited to: more road widenings; accelerated bridge repair needs; and municipal participation in or funding contributions to regional transit solutions. There will be an increased need to offer alternatives to the automobile for the growing workforce that will travel between the Town and the Project site. See additional discussion in “Traffic and Safety”, Item 12 below.
2	Emergency Management	The Town of Saugeen Shores is the host community for the Provincial Nuclear Response Plan. Increased nuclear output will result in increased demands for mandatory mobile decontamination and worker reception resources. These include wastewater containment, increased space and areas for staffing. Demand will also increase for emergency planning training and mass notification resources.
3	Fire Services	An influx of trades and employees specific to Bruce C in conjunction with the Major Component Replacement (MCR) will lead to an increased call volume locally as well as increased demand for mutual aid support as a neighbouring municipality.
4	Police Services	The Town’s Police Service has already experienced an increase in call volume over the last 8 years with the influx of the workforce from the Life Extension Project / Major Component Replacement. Additionally, several staff have been recruited by Bruce Power to support their security needs placing further burden on the Police Service.
5	Water and Wastewater Infrastructure	In 2024, the Town will be updating its Water and Wastewater Master Plan, as well as undertaking Environmental Assessments to upgrade the Water Treatment Plant (WTP) and the Port Elgin Wastewater Treatment Plant (WWTP). The Southampton WWTP is being upgraded in 2025 but the capacity increase is limited. The Water and Wastewater Master Plan will address known capacity deficiencies in the water distribution system and the water storage (water towers), and pumping stations based on current projections. Every one of the infrastructure components will have to be sized for greater capacity due to the long-term growth implications of Bruce C, and the Town’s fiscal room will be limited due to the Provincial requirement that the Town have an approved Financial Plan demonstrating sustainability. Current ratepayers would thus have to finance the infrastructure required for this growth, and it is not yet clear if that will be possible.

6	Waste Management including Landfill	Similarly to the water and wastewater above, the Town is currently embarking on a full Environmental Assessment for the Town's existing landfill, with the most likely solution being an on-site footprint expansion. Capacity is being sought for 25-40 years. The growth associated with Bruce C will require a greater capital investment to achieve the design lifespan. Further, the Town is undertaking a Waste Management Master Plan in 2026 to examine long term solutions to the other aspects of waste management (collection, recycling, source separated organics, etc.). An expensive source separated organics program will be mandated by the Province at a population level of over 20,000. The Town is currently anticipating an additional 4,000 in population by 2031 and 8,600 by 2041, Bruce C will escalate that population growth.
7	Community and Recreational Development	Saugeen Shores is a regional hub for community and recreational options (including pool, arenas, sport fields, trails, arts and culture, etc). To attract the workforce required, the necessary community assets and infrastructure need to be in place. There is a current strain on the municipalities resources to build and provide the community and recreational services to meet the current growth demands. The expansion at Bruce Power will escalate those demands.
8	Land Use Planning / Housing	Approximately 40% of people who work at Bruce Power live in Saugeen Shores. This is likely to continue and therefore an unknown number of new residents can be expected to choose to settle in Saugeen Shores. Appropriately facilitating the land use planning processes, through an integrated examination of all potential impacts (housing need, employment land need, location, servicing, etc.) to accommodate the impact is required in advance of the growth. Additionally, spin-offs and induced demand obviously impact housing needs to development in associated sectors and service industries which need to be assessed and planned.
9	Growth Management and Infrastructure	The growth that Bruce C will generate will create increased demand for municipal infrastructure which, in turn, will widen the municipal infrastructure gap. A detailed assessment of the long-term investments and funding sources needed to close that gap, must be completed in order to map out a strategy to ensure the financial sustainability of municipal infrastructure and services. It is also worth noting, from an impact assessment perspective, that municipal services are environmental services - properly sized, designed and functioning waste management, drainage and wastewater systems are key to mitigating the environmental impacts of growth.
10	Economic Development / Workforce Development and Attraction	A nuclear expansion of this nature could significantly boost economic development, creating new jobs and stimulating local business growth. The municipality would benefit from understanding this impact to have proper supports in place. There is the



		potential that workforce development will be a strain on local businesses if the community isn't fully aware of the impact and able to prepare. Additionally, jobs associated with new nuclear are potentially jobs of the future requiring specialized training programs, the need to equip workers with advanced skills in nuclear technology and safety. As a result, the region would be able to attract top talent and investments, further enhancing the economic and technical landscape. Without the proper research to understand this type of impact, the municipality is unable to properly prepare and support.
11	Healthcare – including Physician Recruitment	Understanding the full breadth of the healthcare needs should a nuclear expansion take place is critical. While Healthcare is a Provincial mandate, increasingly municipalities are required to participate in this area. The Town's physician recruitment program is currently challenged by a shortage of qualified candidates, exacerbated by an aging workforce and increasing demand for healthcare services. In the future, this issue may intensify due to the growing population and the need for more specialized medical professionals. Additionally, rural and underserved areas might face even greater difficulties in attracting and retaining physicians and healthcare professionals, impacting healthcare accessibility and quality. Understanding the forecast for this eventuality would better position the municipality to support the Province and community.
12	Traffic and Safety	Highway 21 is the main arterial through Saugeen Shores (Connecting Link) and the Main Street of Port Elgin. It is currently heavily used as a commuting route and shift changes at Bruce Power create easily identifiable "waves" of demand. The downtown signalized intersections are a "choke point" for this traffic, and many drivers adapt by taking side streets. Speeding on the residential streets is already an issue. Increasing traffic volumes will exacerbate this problem and will also run against efforts to improve safe active transportation corridors. The Town will ultimately have to implement road infrastructure solutions to this problem, up to and including considerations of alternative routes, an expensive proposition. The Transportation Master Plan is being updated in 2025 and will need to include these considerations.

\* This overview is provided as preliminary context as the Town of Saugeen Shores has not had the time or resources to adequately review, analyse or prepare formally for the commenting period.