



The Joint Chiefs and Councils
of the Saugeen Ojibway Nation

May 28, 2025

Larry Shuter
Senior Policy Analyst, Consultation Operations Division
Impact Assessment Agency of Canada (IAAC), Government of Canada
<contact information removed>

Dear Mr. Shuter:

We write in response to your correspondence last week requesting comments from the Saugeen Ojibway Nation (SON) on the Tailored Impact Statement Guidelines (TISG) for the Bruce C Project. SON is, unfortunately, unable to provide detailed comments on the TISG at this time.

Since Bruce Power requested a temporary suspension of the time limit for the planning phase of the impact assessment process on January 15, 2025, SON has been working to lay the groundwork for our participation in the impact assessment process. Our technical experts have been focused on identifying SON's key valued components, and we are developing a process to seek membership input on their key interests and concerns, which will help to refine SON's identification of valued components.

At the same time, we have been working with Bruce Power to establish a collaborative relationship to assess the Bruce C Project and have been negotiating a comprehensive agreement to address the assessment and other matters between us. As you are well aware, we also remain eager to finalize the relationship agreement between SON and IAAC to guide impact assessments in the SON Territory, including the process for the Bruce C Project, and await IAAC's comments on the draft document.

SON had hoped that the impact assessment would remain suspended until SON had had an opportunity to obtain membership input, and until these two agreements had been finalized—agreements that SON had wanted to have in place prior to the initiation of the impact assessment process in the first place. It was only recently that we learned that Bruce Power intends to resume the impact assessment process.

Given the unexpected resumption of the timelines, we are not able to provide detailed comments at this time. However, we have outlined SON's interests at a high level below, which we expect will be reflected in the TISG.

SON intends to carefully assess the Bruce C Project and its potential impacts to determine whether SON can support the Project. SON must be fully engaged at every step of the federal impact assessment process, including but not limited to: the identification of valued components, and the temporal and spatial boundaries for each; assessing the sufficiency of baseline data; the development of required research and monitoring programs/studies; the design of the cumulative effects study; the review and

interpretation of study results and the drawing of conclusions on the significance of effects; assessing the sufficiency of research and monitoring programs; decisions relating to the preferred project design; the development of appropriate mitigations, accommodations and benefits; and the development of monitoring plans.

SON's assessment of the Bruce C Project will be driven by the SON membership and focused on key areas of membership concern. These areas are expected to include, among others: understanding and minimizing the interaction of the Bruce C Project with the aquatic environment, understanding and addressing the potential socio-economic effects of the Bruce C Project, reducing cumulative effects by addressing impacts of the existing facility, and additional areas to be identified through membership engagement. SON is working with Bruce Power to develop a process through which these areas of key membership concern, and other areas of interest to SON, can be addressed.

Most importantly, SON expects that the TISG will explicitly recognize SON as the Indigenous People of Anishinaabekiing, an area which encompasses much of the Saugeen (Bruce) Peninsula, extending down south of Goderich and east of Collingwood, and in which the Bruce site is situated. SON further expects that the TISG will explicitly recognize the need for SON's free, prior, and informed consent (FPIC) to be obtained, rather than speaking in general terms about FPIC from "Indigenous Nations and communities." SON is the only Indigenous Nation with recognized rights in the SON Territory.

SON intends to continue to work with IAAC to develop a strong government-to-government relationship between SON and IAAC to ensure that assessments of major projects in the SON Territory, including the Bruce C Project, are protective of SON's rights and interests, respect SON values, and provide SON with the information SON requires to exercise its FPIC rights. We will be providing more detailed comments on the TISG in the future, and expect that we will work through those comments in continued government-to-government discussions with IAAC.

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Paul Jones
Chippewas of Nawash Unceded First Nation

Lester Anoquot
Saugeen First Nation