



## **ELECTRONIC MAIL**

September 9, 2025

Weina Chong  
Director, Regulatory Affairs – Bruce C  
Bruce Power

email address redacted

Weina Chong:

### **Subject: Submission of project information**

The purpose of this letter is to provide advice to Bruce Power to meet the expectations of the Impact Assessment Agency of Canada (IAAC) and the Canadian Nuclear Safety Commission (CNSC) with respect to the submission of project information throughout the integrated assessment.

#### **Posting to the Registry ensures a transparent process**

The integrated review panel, as an administrative tribunal, must ensure that there is a fair and transparent process that allows the public and other parties to understand how it came to its conclusions and recommendations. IAAC's Canadian Impact Assessment Registry (the Registry) will be used to facilitate public access to records related to integrated assessments. The integrated review panel can only rely on information that is posted on the Registry (or privileged information as described in the *Impact Assessment Act* (IAA)) to ensure that all parties have equal access to the information that will be used. References and/or hyperlinks in submissions will not be considered as part of the record for the integrated assessment.

Bruce Power is expected to:

1. Summarize key information from external sources directly in the Impact Statement or file the key sections of a referenced document to be posted on the Registry.
2. Provide all information that is not privileged to IAAC through the proponent portal. IAAC will be responsible for posting the information on the Registry.

### **Privileged information**

Certain information is subject to non-disclosure under the IAA. Where IAAC (section 30) or the review panel (section 53(4) & (5)), as the case may be, is satisfied that the disclosure of evidence, records or other things (privileged materials) would cause specific, direct and substantial harm to a person or Indigenous group, or cause specific harm to the environment, then those materials are not subject to disclosure. In addition, in accordance with the *Access to Information Act*, disclosure of information cannot occur if it would be prohibited under section 20.

Bruce Power will be required to explain to IAAC and CNSC or the integrated review panel, depending on the phase of the integrated assessment, what the harm would be if the information or documents were disclosed.

IAAC and CNSC are aware that specific information that is likely to be required or incorporated in the Impact Statement may cause harm if disclosed, such as:

- Letter of Authority (information on lease and agreements)
- Financial guarantees
- Vendor design content (commercially sensitive information)
- Security information
- Safeguards information
- Indigenous knowledge (where requested by the Indigenous group)

Where Bruce Power is seeking to prevent disclosure of information in certain records, only the necessary and relevant information should be provided in those records. IAAC and CNSC can help guide the proponent in finding the right level of detail required for the Impact Statement, including the Licence to Prepare Site information.

Bruce Power is expected to:

1. Submit a request, for the information where the proponent wants to prevent it from being disclosed, that identifies the information to be protected from disclosure along with justification on how the information's disclosure could cause specific harm to a person, an Indigenous group or the environment. Depending on the phase of the integrated impact assessment, the request to protect the information from disclosure and its justification must be sent to IAAC and CNSC or the integrated review panel. IAAC and CNSC or the integrated review panel must be satisfied that disclosure will cause harm to a person or Indigenous group or the environment before a decision can be made as to whether to protect the information from disclosure. Once the decision is made, a record of decision will be posted on the Registry.

2. Include a publicly accessible summary of the non-disclosed information in the Impact Statement.
3. Work with IAAC and CNSC or the integrated review panel secretariat to submit information where the information should be protected from disclosure. The submission of this information will be managed through CNSC's system.

### **Indigenous Knowledge**

Section 22 of the IAA states that consideration of Indigenous Knowledge provided in an assessment is mandatory. In addition, when an Indigenous Nation or community specifies that it is providing Indigenous Knowledge in confidence, it must be treated as confidential (IAA, section 119).

Bruce Power is expected to:

1. Work with Indigenous Nations and communities to incorporate Indigenous Knowledge into information used for this integrated assessment.
2. Prior to Bruce Power submitting information that includes Indigenous Knowledge, work with each Indigenous Nation and community to see if that information should be treated as confidential prior to submitting it to the proponent portal. Additional guidance on Indigenous Knowledge is available on the IAAC and CNSC websites.
- 3.

### **Planning ahead**

IAAC and CNSC are committed to providing proponents with an efficient process for submitting project information. To help us prepare, we request that you provide a preliminary list of all impact assessment and regulatory documents you intend to submit for the integrated assessment and identify which ones you believe would be subject to non-disclosure **before November 20, 2025**. We also request that you submit a final list of impact assessment and regulatory documents two months before the submission of the Impact Statement.

IAAC and CNSC look forward to starting discussions with you to proactively respond to questions on this topic to ensure the submission of project information is processed efficiently.

Should you have any questions, please do not hesitate to contact me at [bruce@iaac-aeic.gc.ca](mailto:bruce@iaac-aeic.gc.ca).

Sincerely,

< *sent electronically* >

Dominic McRae  
A/ Assessment Review Manager  
Review Panels Division

cc: Candida Cianci, Director, Review Panels Division, IAAC  
Doug Wylie, Acting Director, Environmental Review Division, CNSC  
Sean Belyea, Acting Director, Advanced Reactor Licensing Division,  
CNSC