

Bruce County Submission to IAAC & CNSC on the Initial Project Description for the Bruce C New Nuclear Project

September 6, 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

Dear Sir/Madam,

Bruce County 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 1st, 2024 and released for 30 day public comment period on August 12th, 2024. The County 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 below comments 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 are 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.

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 County'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, in the Municipality of Kincardine. The Bruce C Nuclear Project proposes to provide up to 4,800 megawatt-electric of new nuclear generating capacity for Ontario.

Bruce Power has been pro-active in engaging the County and local municipalities through the pre-planning phase of the Bruce C project. The engagement and information sharing has been helpful for the County and municipalities to gain an understanding of the proposed project and the Impact Assessment process.

Interest in the Project

The proposed Bruce C Nuclear project is located in Bruce County, within the Municipality of Kincardine. Bruce County is a nuclear host community and home to Bruce Power's current facilities - Bruce "A" and Bruce "B".

Bruce County, within the traditional territory of the Saugeen Ojibway Nation, consists primarily of rural communities with a collective population of less than 75,000. Nestled between Lake Huron and Georgian Bay, we are known for our natural heritage, and as a destination for all Ontarians.

Bruce County is an upper-tier level of government responsible for delivering infrastructure and services including roads and bridges; paramedic and community paramedic services; emergency management; land use planning; economic development; human services; housing and homelessness services; libraries; museum and cultural services; and government relations. The County delivers services across eight local municipalities.

On June 6, 2024, Bruce County Council endorsed the [Declaration of the Global Partnership for Nuclear Communities](#) as set of principles for engagement on nuclear energy sector projects. Endorsing the Declaration of Global Partnership of Nuclear Communities establishes a framework for the County's expectations for engagement with project proponents and establish expectations for the County to be involved in Impact Assessment processes on nuclear energy sector projects. Principles in the Declaration include:

1. **Engage municipalities in the process.** Access to expertise and decision-makers is central to ensuring local priorities meet provincial and national energy interests.
2. **Create economic opportunities in the local community.** Work to understand local and County economic development plans and the potential role of the project.
3. **Provide resources to the community to participate in the project.** Ensure sufficient resources to ensure sustained engagement and address any needs of the region based on the project.
4. **Protect human health and the environment.** Municipal leaders focus on the health, safety and welfare of their communities, necessitating early engagement in any decision-making processes related to nuclear facilities

These principles reflect the interests Bruce County Council has in the Bruce C project.

Anticipated Impacts

Economic Development Impacts

Bruce County 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, Bruce County knows both the environmental and economic importance of the energy sector in the daily lives of Ontarians. Investing in a new nuclear build in Bruce County 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 within the County.

As the largest employer in Bruce County, Bruce Power has a positive direct and indirect 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 Bruce County's continued economic growth. The proposed Bruce C Nuclear Project will provide sustained well-paying jobs that will support business and the local economy well into the future, acting as a catalyst for resident attraction and youth retention. The project demonstrates the strength and specialization the region has as Ontario's Clean Energy Frontier.

The energy currently generated in Bruce County supplies 30% of Ontario's electricity, and our region is relied upon to 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. This Major Component replacement has resulted in over 60 supply companies locating operations in Bruce County, contributing significantly to the economic climate in the region. The innovation that can happen in this cluster of businesses not only ensures continued operation of the existing fleet of reactors but will be well positioned to support a potential Bruce C Nuclear Project. Additionally, these partnerships have resulted in a significant proportion of the world's supply of medical isotopes (used to sterilize equipment and treat cancer) being produced by Bruce Power. Further investment in the proposed Bruce C Nuclear Project has the potential to see the continued growth of medical isotope production in Bruce County, supporting Canada's role as a leader in this space. Growth of the energy and medical isotope sector is strongly supported in Bruce County.

Environmental Impacts

It is understood that the Bruce Power site is one of the most studied and understood sites in all of Canada. The County 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.

Socio-economic Impacts

It is understood that assessing the socio-economic impact of a large-scale infrastructure project is relatively new consideration as part of an Impact Assessment for new nuclear projects. The County and municipalities welcome 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 the area's largest employer, with approximately 4000 employees, Bruce Power and its expansion has the potential to have a significant impact on the communities which surround the nuclear generating site. Within Bruce County, the Municipalities of Kincardine, Saugeen Shores and surrounding local municipalities are home to a significant portion of the Bruce Power workforce, and nuclear suppliers. These communities, along with Bruce County, deliver infrastructure and municipal services to both Bruce Power as a business, as well as directly to their employees in community.

It is also appreciated that it is challenging for a proponent of a project to fully address the scope of socio-economic impacts that may be related to a project - and yet,

As levels of government that deliver infrastructure and services locally, Bruce County and our local municipalities believe it is important consideration to include in the Initial Project Description, and throughout the Impact Assessment process - and at the same time appreciate it is challenging for a proponent of a nuclear project to address the full scope of socio-economic impacts that may relate to a project.

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. Bruce County and a number of local municipalities participated in interviews to inform that work. County staff will 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 across Bruce County.

Expansion to the nuclear generating facility at Bruce Power is anticipated to create increased demand on infrastructure and services delivered by the County and 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 County and local municipal infrastructure and services, as well as broader community services delivered by other levels of government including health care and education. The Impact Assessment will support inquiry that allows for a more fulsome understanding of the possible range of impacts of the proposed project.

At a high level, it is anticipated there will be impacts from the Bruce C project for demand and investment for the following infrastructure and services:

- community and recreational infrastructure and services
- doctor recruitment
- economic development and workforce attraction
- emergency management planning and response
- emergency services (fire, police and paramedic services)
- employment services
- growth management & land use planning services
- housing, including market-housing and affordable community-based housing
- human (social) services
- long-term care
- public transportation (transit)
- roads and transportation infrastructure
- sewer and water infrastructure
- traffic and safety
- waste management

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

- broadband internet and cellular coverage
- healthcare and hospitals
- public and secondary schools
- post-secondary education
- provincial highways
- regional level transit

The infrastructure and services delivered by Bruce County, the Municipalities of Kincardine and Saugeen Shores, and surrounding municipalities are critical to the success of nuclear and energy infrastructure projects. These factors are key to ensuring that facilities such as Bruce Power are able to attract workers and operate safely. Ensuring these socioeconomic factors are managed, are critical to the project's long-term success.

To further inform the socio-economic impacts that may be associated with this project, Bruce Power has committed to fund a municipal socio-economic review that will be prepared by Bruce County, and the Municipalities of Kincardine and Saugeen Shores. Bruce County will be engaging the other six local municipalities to prepare the study.

The detailed municipal socio-economic support study will aim to establish workforce and population projections based on the Bruce C Project, to support growth management work related to allocation of population and review of land supply needs for commercial and residential development. The study will also support an understanding of delivery of services and assess infrastructure and service gaps that fall within County and municipal service delivery framework to meet growth associated with the Project.

This work will be able to inform a strategy on how the possible range of socio-economic impacts are best addressed involving the proponent, stakeholders and other levels of government.

Financial Impacts

The County and local municipalities need to prepare communities for growth, infrastructure investment and demand for services. This preparation is required to support Bruce Power as an employer, their employees, and broader community. Understanding the impact to infrastructure and demand for services tied to a potential Bruce C project is critical to ensure the Bruce C project has a positive socio-economic impact in the County.

As Bruce County and local municipalities work to understand the scope of infrastructure and service demands needed to support a Bruce C project, we do so in the context where Bruce County receives the lowest provincial and federal funding among six comparable upper-tier county governments. This underfunding impacts our ability to deliver essential services, including housing, transit, infrastructure, social assistance, childcare, long-term care, energy health care, and other municipal services. Starting from a position where the County and municipalities are already experiencing under-investment in critical infrastructure and

services, creates further pressure to be able to prepare community for the impacts that may be associated with the potential Bruce C project.

Currently, County and municipal infrastructure projects and services are largely funded from a municipal tax base of less than 75,000 residents. This means that local citizens are burdened with the cost of this preparation work as the result of a potential expansion. Investment is needed to prepare communities for the impacts from Bruce C and will require funding from other sources beyond municipal property tax.

Municipalities currently lack a structured framework and 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 and the County will struggle with the added burden of impact assessments, licensing, and support for infrastructure and service demands without sufficient support beyond the current property tax base to fund them.

Cumulative Impacts

The scope and scale of proposed investment in energy projects in our region, demonstrates Bruce County will play a central role in Ontario's clean energy future. A role we are excited to pursue.

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 waste 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, local municipalities and the County are conscious of potential cumulative impact of the scale of energy investment in the region that will need to be addressed should these projects proceed. Federal and provincial investment in Bruce County is required to ensure the costs associated with supporting energy projects in our region to meet Ontario's energy needs is shared by all of Ontarians.

Challenges to Participation in the Impact Assessment Process

Financial resources are required to support the participation of the County and municipalities in the Impact Assessment process for Bruce C. There is a considerable financial burden for municipalities to be pro-actively engaged in the Impact Assessment process. Work to engage in an Impact Assessment requires staff to delay other regular municipal duties and responsibilities.

While IAAC funds public participation, it is understood that it does not fund municipalities to participate in the Impact Assessment process. Stable and reliable sources of Municipal capacity funding will facilitate greater capacity for and meaningful municipal participation on the Bruce C project, and energy projects in general.

Summary

The County of Bruce appreciates the opportunity to be engaged and provide comment on the Initial Project Description through the formal Impact Assessment process. The County looks forward to actively engaging with Bruce Power, and IAAC and CNSC through the Impact Assessment process for the potential Bruce C project.

Sincerely,

Chris Peabody,
Warden
Bruce County

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