

Municipality of Kincardine Submission to IAAC & CNSC on the Initial Project Description for the Bruce C New Nuclear Project

September 12, 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,

The Municipality of Kincardine 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 Municipality 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. It is our understanding that this is the first nuclear project to proceed through the new Federal 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 municipality.

These comments have been endorsed by the Council for the Corporation of the Municipality of Kincardine at its September 11, 2024, meeting as the formal submission from the municipal host community on the Bruce C Initial Project Description.

Bruce C 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 Municipality of Kincardine's understanding that 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 engaging municipal staff and the community 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.

Overview of the Municipality of Kincardine

The Municipality of Kincardine is in southwestern Ontario, along the shores of Lake Huron, in the traditional territory of the Saugeen Ojibway Nation. The municipality has a population of approximately 13,000 people. The key economic sectors for our community include nuclear, tourism and agriculture.

Following amalgamation, what is now the Municipality of Kincardine was once the Village of Tiverton, Township of Bruce, Town of Kincardine, and Township of Kincardine. The Municipality provides vital services and programs to residents and attracts upwards of 1 million visitors/tourists annually with our beautiful shoreline, historic downtown core, and renowned special events.

The Municipality provides a wide range of services and infrastructure such as roads, drinking water, wastewater, waste management, emergency services, building and development services, recreation facilities and programs, parks, trails, physician recruitment, economic development, tourism and inclusion/diversity initiatives.

Kincardine is a lower-tier municipal government within a two-tier system, with Bruce County as the upper-tier. This means that some local government services are provided by the Municipality of Kincardine, some are delivered by Bruce County, and some are delivered in some form of partnership. Additionally, there are provincial government services delivered through the local governments at either municipal level (e.g. licensing, paramedic services), as well as by other bodies mandated by the province (e.g. public education), and services provided directly by the province (e.g. provincial highways).

Interest in the Project

Bruce Power notified the Canadian Nuclear Safety Commission and the Impact Assessment Agency of Canada of its intent to launch an impact assessment for new nuclear generation on the Bruce Power site in October 2023. The notice of intent from Bruce Power notes the commitment to engaging Indigenous peoples, local communities, stakeholders, and the public early in the process. The Municipality of Kincardine is pleased to be part of the engagement as the host community.

The Municipality of Kincardine is home to Bruce Nuclear Generating Station (the Bruce Power Site), the largest fully operational generating station in North America, which generates approximately 30% of Ontario's electricity. The Bruce Power Site, which is located near the centre of the municipality's shoreline, is also the site of Ontario Power Generation's (OPG's) Western Waste Management Facility, which stores low and intermediate level nuclear waste for all the commercial reactors in Ontario, as well as the high-level nuclear waste or 'used fuel' from the Bruce Power reactors. Also on the site is the retired Douglas Point Nuclear Generating Station, owned by Atomic Energy of Canada Limited (AECL).

Bruce Power is the largest employer in the region and a vital component of our regional and local economy. The number of contractors and employees at the Bruce Power Site is estimated to range between 4,000-10,000/day supporting Bruce Power operations, outages and the Major Component Replacement (MCR) project. OPG also employs approximately 125 employees on-site. In addition, there are other employees, contractors and supply chain companies located off-site.

According to ReNew Canada, the current MCR and Life-Extension project happening on the Bruce Nuclear Site is the third largest infrastructure project in Canada. The Municipality welcomes the additional investment at the Bruce site, the additional good paying jobs and economic opportunities this project has provided the region. Bruce Power's vision to build a local supply chain has resulted in over 60 nuclear suppliers in the area, creating a strong nuclear economic hub in the region.

The development of new nuclear energy supports Federal and Provincial goals related to climate change, reducing greenhouse gas emissions, and increasing energy supply for a growing province and country. As a host community, the Municipality of Kincardine is pleased to support and take a leading role in a major energy project that will help the Federal and Provincial governments meet their climate change mandates and support the production of additional affordable electricity. This work must be done collaboratively with involvement from all 3 levels of government (federal, provincial and municipal), together with Indigenous communities, industry and regulators in order to identify issues and mitigate the impacts to local communities and the environment. A collaborative approach will ensure that rural communities are not left isolated in dealing with any potential offsite socio-economic impacts.

As outlined in the submission below, the Municipality of Kincardine has historically been impacted by major infrastructure decisions at the Bruce Power site and we anticipate this will continue to be the case for the Bruce C project.

The municipality anticipates that the process under the *Impact Assessment Act* will see the proponent for the Bruce C Project identify the potential for any environmental, health, and socio-economic impacts of the Bruce C Project to the CNSC, IAAC for the Municipality of Kincardine and the broader region, which includes Bruce County and other lower-tier municipalities within the county. It is also anticipated that such a review will help to identify positive and negative impacts, their effects, and how those effects will be enhanced or mitigated.

Historical Impacts of the Bruce Nuclear Site

Over the past 60 years, our community's economy and growth have been directly impacted by major infrastructure decisions at the Bruce Power Site (formerly Ontario Hydro). Below are a few historical examples:

- 1960s Douglas Point was constructed: Being Canada's first commercial nuclear reactor, there was a lot of local pride in the project. Prior to this time, the area was predominantly an agricultural community.
- 1970s Bruce A and Bruce B were constructed: The community experienced a significant population increase, particularly in the Town of Kincardine, and a large influx of housing was constructed. The Province recognized the impact the project would have in our rural community and provided supports and infrastructure investments to ensure the community was prepared for the additional growth.
- Late 1990s: Reactor units 1-4 were shut down resulting in a major economic decline in the community, which had devastating impacts on workforce and the local housing market.

- Late 2016: Bruce Power announced the MCR Life Extension Project and since this time, the municipality has experienced an influx in new jobs in the community and a significant surge in demand for more housing and development.

As a small community with one major industry and employer, it is important that the Municipality prepare for major infrastructure investments at the Bruce site and plan for these economic cycles. Unfortunately, an Impact Assessment process was not required for the MCR project, and the Municipality recognizes that we did not proactively prepare and plan for the impacts of this latest economic cycle, specifically with respect to new development and housing required to support the influx of new workers.

Nuclear Global Partnership Principles

In October of 2023, the Group of European Municipalities with Nuclear Facilities in Europe (GMF Europe), the United States-based Energy Communities Alliance (ECA), and the Canadian Association of Nuclear Host Communities (CANHC) came together to form The Global Partnership. As an association, they adopted the following principles:

1. **Engage municipalities in the process.** Access to expertise and decision-makers is central to ensuring local priorities meet national interests.
2. **Create economic opportunities in the local community.** Work with the local municipality to understand local 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 are charged with the health, safety and welfare of their communities, necessitating early engagement in any decision-making processes related to nuclear facilities.
5. **Educate and train the workforce.** Educating and training the workforce is critical for any long-term project.¹

These five principles align with other stakeholder engagement principles related to the individual associations, including building trust, demonstrating accountability, promoting transparent communication, providing early and frequent consultation, and communicating benefits and risks.

These associations (GMF Europe, ECA, and CANHC), which represent local governments as nuclear host communities, recognize nuclear power's vital role in meeting global energy demand while addressing climate change and achieving sustainable development goals. Host municipalities of nuclear facilities serve a crucial role in enabling the supply of safe and reliable

¹ <https://gmfeurope.org/news-october-2023-press-release/>

<https://www.canhc.ca/wp-content/uploads/2024/03/Press-release-Global-Partnership-at-NES-1.pdf>

<https://www.canhc.ca/wp-content/uploads/2023/05/Press-Release-CANHC-host-municipalities-statement.pdf>

energy. The Global Partnership of Municipalities Hosting Nuclear Facilities seeks to promote dialogue and collaboration between its member municipalities and the nuclear industry. Part of the Global Partnership's aim is to enhance the socioeconomic opportunities for communities, increase the safety, security, and sustainability of nuclear facilities, and improve public acceptance and engagement on nuclear energy related issues. This partnership serves as a platform for municipalities to exchange experiences and lessons learned in nuclear energy regulation, waste management, emergency preparedness, and community engagement.

As a member of CANHC, the Council of the Municipality of Kincardine endorsed the principles of The Global Partnership in May 2024. The Municipality plans to apply these principles as the foundation and framework for engagement for new nuclear projects, and specifically for the Municipality's interest in the Bruce C project.

Existing Conditions and Potential Impacts of Bruce C

Most things that happen outside the perimeter of the Bruce Power site are interconnected with municipal operations and services, and these activities need to be considered in the Impact Assessment process. At the same time, it can be challenging for a proponent of any large-scale project to address the full scope of socio-economic impacts that may relate to its project. It is further complicated when the services and impacts overlap various levels of government.

With the MCR project currently underway, the municipality has a heightened appreciation of the impacts that a significant project can have on our community. The Municipality of Kincardine welcomes the additional investment on the Bruce Power Site and hopes to build upon existing partnerships and relationships with the local industry, the regulator, the province, and the federal government to understand and realize the positive impacts and collaborate to mitigate negative impacts.

Listed below are some areas where the community has in part been impacted by the MCR infrastructure project on the Bruce Power Site and where we would anticipate there being potential impacts of future projects which may require mitigation.

Environmental Impacts

It is understood that the Bruce Power site is a well-studied and understood site in Canada. The Municipality of Kincardine 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

The Initial Project Description notes a Municipal Socio-Economic Existing Conditions Report by Bruce Power being undertaken to characterize community social, economic, and human health conditions, in addition to non-traditional land and resource use, which could experience effects because of the Project. Municipal staff have provided data and information to Bruce Power related to the municipality to help inform the report as it is being finalized.

The Municipality of Kincardine supports senior governments' goals to electrify the economy and invest in clean energy, including nuclear energy. The Municipality understands both the environmental and economic importance of the energy sector in the daily lives of Ontarians. Within the [Municipality of Kincardine Economic Development Strategy](#) Objective 1 is to 'Solidify the Community's Presence in the Nuclear Sector and Become the Leading Nuclear Sciences Community in Canada'. Investing in a new nuclear build on the Bruce Site aligns with this objective. There is a high level of citizen engagement, knowledge of the industry and acceptance of large-scale energy projects due to the existing nuclear industry in Kincardine, and the Bruce C Project has the potential to benefit from the streamlining of the federal regulatory process.

Additionally, a significant proportion of the world's supply of medical isotopes (used to sterilize equipment, diagnose 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 Bruce County. Overall, growth of the clean energy and medical isotope sectors is well supported in the region.

Community Wellbeing

Bruce Power, the nuclear suppliers, and unions contribute positively to the local community by actively supporting local organizations and events with sponsorships, donations and volunteering. Many local organizations and community groups would likely struggle to maintain current programming without the ongoing support of Bruce Power, its employees and the nuclear sector.

Jobs/Workforce

As the largest employer in the Municipality and within Bruce County, Bruce Power has a positive economic impact across the region and Ontario. The local labour force in the Municipality of Kincardine is skilled, well-trained, with over half the population having graduated from a university or college program.

The investment from Bruce Power in a potential Bruce C Nuclear Project is expected to provide economic stability in the region, potentially retain and attract new nuclear supply companies, retain and attract more jobs and contribute to community growth. Identifying and understanding projected workforce requirements for the Bruce C Project will be essential in beginning to understand housing needs and future growth requirements.

It is expected that the proposed Bruce C Nuclear Project will help to support youth retention and provide sustained well-paying jobs that will support the local economy well into the future. Bruce Power and its network of suppliers have worked to support skills and training in the community, and we applaud them for this initiative. As part of the Bruce C project, it would be helpful to continue to develop these programs and explore how to reduce or mitigate some of the workforce impacts on non-nuclear companies in the region.

With major nuclear infrastructure projects, there are specialized training requirements and a high demand for skilled trades. With the MCR project, many companies could not always rely on local talent and experience and had to bring in a transient workforce. This transient workforce has unique needs and housing requirements (short term rentals, hotels, etc.), which should be a consideration in the overall potential project impacts so the Municipality can better understand the requirements to support these individuals.

Hiring skilled trades workers becomes challenging within the community, as nuclear sector wages are generally much higher than in other sectors, and businesses cannot compete to attract these skilled workers. The lack of available skilled workforce in the construction industry for home builders and contractors is further fueling the housing shortage challenges.

Labour availability for low wage jobs is currently a challenge, in particular in hospitality, service, tourism, healthcare, childcare, manufacturing, and agriculture.

Housing and Workforce Housing

The Municipality of Kincardine and the Town of Saugeen Shores are home to a significant portion of the Bruce Power workforce and nuclear suppliers. Identifying and understanding projected workforce requirements for the Bruce C Project will be essential in beginning to understand housing needs and future growth requirements to support the nuclear sector's workforce attraction.

With the increased jobs and workforce anticipated as part of the Bruce C project, comes an increased demand for housing. There is already a lack of housing options within the municipality to meet current demand. Like many communities throughout the province, the municipality is working to address our housing situation, but it comes with many challenges that municipalities cannot resolve on their own.

Housing in Canada is primarily market driven, with limited supportive housing options along a spectrum of emergency housing to attainable housing. In Kincardine, approximately 80% of the existing housing stock is single detached homes. Our historical housing stock of single-family homes does not meet the needs of the housing requirements of a transient workforce that is typically looking for rental units. Although we are working to diversify our housing stock, market demands and return on investments for private developers continue to drive single family and higher priced homes. Housing prices in the Municipality of Kincardine are higher than average for similar areas, which appears to be driven by demand.

The Municipality is not a housing provider, nor is housing within our provincial mandate. The Municipality works closely with the County of Bruce, who is our Local Housing Service Manager. The County receives some funding from other levels of government to offer housing programs and services.

Using its own resources, the Municipality has developed a Housing Action Plan. We are working through several actions to address local housing challenges, such as updating zoning regulations to permit additional residential units on a lot, as well as other creative ways to increase the variety and overall housing stock in the community.

As a result of the existing issues related to housing challenges, some service industry employers in Kincardine have opted to provide workforce housing to meet the housing needs of their workforce. The current MCR project is the third largest infrastructure project in Canada, and there is no workforce housing program associated with the project.

The Municipality has experienced a 0% rental housing vacancy rate since 2016, which means there are no or very few rentals available. This continues to drive the rental rates higher, and some individuals that were previously housed are now priced out of the rental housing market resulting in increased homelessness.

Some nuclear companies and/or unions provide weekly or monthly housing allowances and per diems that support the workforce attraction to the area. This continues to create issues for the local housing markets as the higher wages and housing allowances make the rental housing market competitive and drive-up rent prices. Online housing rental ads in the community can be directed and limited to Bruce Power or nuclear workers. This makes it challenging for others in the community to secure rental housing and get into the competitive housing market. Further, Kincardine has had to address compliance issues related to the renting of spaces that are not intended for human habitation.

A workforce housing strategy should be required as part of the socio-economic studies to help support the opportunity for success associated with the Bruce C Project.

Infrastructure and Municipal Services

Expansion to the nuclear generating facility at Bruce Power is anticipated to create increased demand on municipal infrastructure and services through the site preparation (2028-2031), construction (2031-2045) and operation (60-100 years) phases of the proposed Bruce C project.

The Municipality of Kincardine delivers infrastructure and municipal services to both Bruce Power as a business, to the suppliers and unions serving Bruce Power, as well as directly to their employees in the community.

Core infrastructure includes roads, bridges, drinking water, wastewater, waste management and recreation. Additional growth in the region to support new industrial development and housing will require significant investments in expanding our current infrastructure. Understanding the full scope and scale of growth pressures to accommodate additional workforce and industry will be helpful for the Municipality in future planning.

The infrastructure and services delivered by the Municipality of Kincardine, other local municipalities like Saugeen Shores, as well as Bruce County are critical to the success of future nuclear and energy infrastructure projects at the Bruce Nuclear Site.

Safety and Integrated Transportation

Transportation is multi-jurisdictional, as there are local and county roads that are used to access the Bruce Power Site along with nearby provincial highways.

The Municipality of Kincardine has been advocating to the Ministry of Transportation (MTO) for several years for improvements and upgrades to Highway 21, specifically around problematic intersections and school areas.

It is expected that workers travelling to and from the Bruce Power Site, as well as trucks carrying supplies, materials and equipment will generate a significant increase in traffic on all roadways around the site.

There is limited public transportation available for those in the community who do not drive or have access to a vehicle. The Municipality of Kincardine has adopted a Cycling Strategy and invested in infrastructure upgrades to help support active transportation options in the community. Increased traffic could lead to unsafe conditions, particularly for vulnerable road users like cyclists and pedestrians.

A roads and traffic study should be a requirement to review potential widening and rehabilitation or reconstruction of all types of highways to ensure integration of design.

Additional consideration should also be given to the movement of used fuel to the eventual DGR site as this will have additional transportation considerations.

Emergency Management

Kincardine has a Nuclear Emergency Preparedness Agreement between the Municipality and Bruce Power. Bruce Power provides funding towards the local emergency management program, which supports annual emergency management program; meetings, municipal emergency preparedness, drills/exercises and training, public education, and reports and administration.

Kincardine is regularly engaged by Bruce Power to exercise emergency plans and to conduct drills, including large-scale emergency exercises.

The Community Emergency Management Coordinator for Kincardine maintains a call-down list for all households (approximately 35-40) within a three-kilometre radius of the site perimeter in case emergency response action is necessary. The area is also served by warning sirens. Residents in this area are provided information regarding the required response should these sirens sound and are given annual reminders.

In 2015, Bruce Power, in partnership with the Grey Bruce Health Unit and regional municipalities, has made Potassium Iodide (KI) tablets available to all residents, schools and businesses within a 50-kilometre radius of Bruce Power. Those within a 10-kilometre radius received the tablets, while those between 10-50 kilometres from Bruce Power received coupons and information on KI.

Prior to the pre-distribution, KI has always been available to residents free of charge. The pre-distribution of KI tablets was advocated by the CNSC and replaced having the tablets stored at one central location at the Municipal Reception Evacuation Centre in Kincardine.

Potassium Iodide, when taken as instructed, blocks the thyroid from radioactive iodine in the unlikely event of a radiation release. For all residents, schools and businesses within a 50-kilometre radius to Bruce Power, distribution pick-up points have been made available.

The Municipality of Kincardine's emergency response plan, including designated emergency evacuation routes and zones and designated media, can be found on the [Municipality of Kincardine's website](#) and more information about personal emergency preparedness can be found on the [Be Prepared Grey Bruce Huron website](#).

Education/School Capacity

Public education is funded by the provincial government and delivered through school boards. Funding for school capital projects is based on current population as opposed to population projections, which can result in a mismatch of student spaces at the time that capital projects are executed by a school board. Additionally, small school boards may not have the resources to support expedited school buildings and expansion projects.

At a provincial level, it may be useful to consider a different form of modelling to support school investments within the community as the Bruce C Project proceeds.

Post-secondary education in the region is limited, and young people often leave the community to attain post-secondary education. Providing local training options to retain our youth would be desirable.

Day Care /Childcare

Our community has experienced a significant increase in the younger population in recent years. As our community grows with an increase in labour force, additional childcare options are required. Most current programs like daycares, before and after school programs, and summer camp programs are already at capacity with long wait lists. This issue is expected to continue as Bruce C proceeds.

The YMCA has recently moved to a new childcare facility at St. Anthony's school that welcomes some additional spaces, and the Municipality is working with other childcare providers looking to expand or secure a location in the community.

Like many industries, a lack of workforce is impacting the childcare services. Bruce Power has partnered with Bruce County to offer more ECE training programs in the area to address this workforce shortage and we are hopeful this pilot program will continue.

Health Care

Kincardine is recognized as having heightened emergency services and health care available to meet existing needs when compared to other nearby communities.

Healthcare is a provincial government mandate, but because of the significant challenges in ensuring adequate healthcare, the Municipality of Kincardine has for many years provided a significant amount of property tax dollars to ensure healthcare services within the community. In 2023, the municipality provided close to \$1M to support healthcare, including financial incentives for physicians to locate and establish a practice in the community. This included waived and/or reduced rental fees for physicians practicing in the medical clinic built and operated by the municipality, financial incentives for physicians to cover ER shifts, as well as resources to help facilitate locums placed in locum housing. Property tax funding has also been directed towards additional nurse practitioners, as well as new healthcare-related capital projects.

Bruce Power recently announced funding that provides \$150,000 annually for the next 3 years split between Kincardine and Saugeen Shores to help support Emergency Room availability and its continued support for the hospitals.

Like other communities, Kincardine is concerned about Emergency Room closures within the South Bruce Grey Health Centre. The Kincardine Hospital Emergency Room was temporarily closed for a brief period of time in 2022 due to lack of health human resources. This facility houses an emergency decontamination area that could potentially be activated in a nuclear facility/radiological emergency which is established to support Bruce Power employees and residents of Kincardine through our Emergency Workers Centre and Reception and Evacuation Centre.

It is expected that there will be increased need and demand for healthcare services and hospital facilities, physicians, locums, and locum housing. It would be beneficial for focused provincial attention to the health care sector in the region.

Policing

It is anticipated that there will be increased policing required, as there is expected to be an increase in population and an increase in transient population. This would have a direct impact on the property tax payers, given the OPP billing model.

Financial Impacts

The County and local municipalities need to prepare communities for growth, infrastructure investment and demand for services. This investment is required to support Bruce Power as an employer, their employees, the nuclear supply chain, unions and skilled trades 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.

Investment is needed to prepare the Municipality of Kincardine for the impacts of Bruce C and considering this is a project to power the Province of Ontario, it is anticipated that some funding will need to come from other sources beyond local municipal property taxes.

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 infrastructure and service demands without sufficient support beyond the current funding arrangement for a nuclear facility fund them.

Non-Market Valuation Assessment for Nuclear Power Generation Stations

The Municipality has reviewed the current approach to property assessments for hydro-related properties in Kincardine, as these properties are valued and assessed differently than most residential, commercial or industrial properties. The current valuation model has resulted in very nominal increases in taxation for hydro-related properties, while other properties in the Municipality have experienced significant tax assessment increases over the past 20 years. This appears to be resulting in a tax burden shift from hydro properties to the rest of the tax base.

Local Considerations Related to Federal Interests/Matters

Nuclear Regulator - Canadian Nuclear Safety Commission (CNSC)

Nuclear facilities are federally licensed and regulated in Canada. The Municipality of Kincardine has participated in many CNSC hearings over the decades and provided written submissions at these hearings. The Municipality has recently started attending quarterly meetings with the CNSC to build our understanding of the industry, the Canadian regulatory environment and upcoming items or potential impacts that may be important to a nuclear host community.

Municipal Participation in the Impact Assessment Process

This is the first nuclear project in Canada to be processed under the *Impact Assessment Act*. There is interest from various parties (e.g. IAAC, Bruce Power) for the host municipality to participate in the engagement process, however, municipalities are considered the 'public' under the Act, and there is no direct funding available to municipalities to build capacity to support engagement. Financial resources are required to support the participation of the Municipality of Kincardine in the Impact Assessment process for Bruce C. There has already been a considerable financial investment of municipal staff time to allow the municipality to be engaged in the Impact Assessment process. Work to engage in an Impact Assessment pulls staff away from regular municipal duties and responsibilities.

Stable and reliable sources of municipal capacity funding are needed to facilitate municipal participation in the Bruce C project, and energy projects in general.

The Municipality of Kincardine participated in the CNSC and EA regulatory licensing hearings for the Ontario Power Generation (OPG) low and intermediate level waste project when it was being considered at the Bruce Power Site. The Municipality had an agreement with OPG to compensate the community for the staff time and resources required to actively participate in that regulatory process. That agreement was terminated when the project did not advance.

Nuclear Waste Management in Canada (NWMO)

Nuclear power production results in nuclear waste. At a federal level, the Nuclear Waste Management Organization (NWMO) is tasked with finding a safe, permanent solution to the storage of used nuclear fuel. A site selection process for storing the waste in a deep geological repository is currently being investigated in two communities in Ontario, one near the Municipality of Ignace in Northern Ontario, and one in the Municipality of South Bruce, which is a neighbouring municipality to Kincardine within Bruce County.

The studies related to the proposed South Bruce location that have been undertaken to date focus on South Bruce and four directly abutting municipalities, which does not include the Municipality of Kincardine. If a site is selected through the current process, it is expected the Municipality of Kincardine will be engaged as part of a consultation on the process for implementing the DGR project, given that spent fuel is currently housed in the Municipality of Kincardine. In particular, if the South Bruce location is selected as the preferred location for the proposed facility, it is anticipated that the socio-economic impacts will be more significant to the Municipality of Kincardine. In the event of any outcome, it is expected to impact the Municipality and result in

additional resources that would be required to help understand and participate in the impacts of the decision related to long-term storage of used fuel.

While this is not solely related to the Bruce C proposal, the overall impact of multiple projects related to the nuclear sector should be expected to have implications for the local government, including the ability to provide advice to the local council. Furthermore, new nuclear projects will create additional waste that needs to be managed in the short and long term. Considering the volume of waste already existing on the Bruce Power Site, further engagement with the community and Municipality of Kincardine should be considered when reviewing new nuclear projects.

Cumulative Impacts

The scope and scale of proposed investment in energy projects in our region demonstrates that the Municipality of Kincardine and the region of Bruce County will play a central role in Ontario's clean energy future.

It is important for Bruce Power, IAAC and CNSC to understand there is the potential for cumulative socio-economic impacts with multiple energy projects currently underway and proposed in the region. These projects include the current MCR project, a potential nuclear waste deep geological repository, a pump 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, Kincardine is conscious of potential cumulative impacts of the scale of energy investment in the region that will need to be addressed should some or all these projects proceed.

Local Considerations related to Provincial Interests

Multi-Ministry Provincial Project Team

In July 2023, Ontario Minister of Energy Todd Smith announced the intent to build 4.8 GW of new nuclear at the Bruce Power Site. This is the first large-scale nuclear build for more than three decades and forms part of the Ontario government's plans for preparing for increasing electricity demand.

As the Bruce C project forms part of the provincial plan for meeting electricity demand, the Municipality hopes for a multi-ministry table, led by the Ministry of Energy, to address provincial and inter-governmental socio-economic impacts of the project, and that the host community of Kincardine is engaged. Many of the current socio-economic stressors in our community are connected to matters of provincial interests, like healthcare, education, transportation, infrastructure, and housing, therefore it's critical for the success of Bruce C Project that impacts and mitigative measures are addressed collaboratively with industry, various levels of government and community partners. Such a table may also be able to assist in the anticipated interface with the Province through the Federal Impact Assessment process.

Bruce C Project - Anticipated Impacts to Municipal Services

Additional Considerations

Capacity Building

Municipalities across the country work to support the principle that growth pays for growth, rather than making existing homeowners pay for it through increased property taxes and user fees. Municipalities are generally set up with staff and access to experts to review routine development proposals, like plans of subdivision, and have an established fee structure that provides compensation for municipal staff time and consultants. New nuclear development is not a routine development and building a knowledge base and understanding of the process to help support community engagement requires increased capacity.

Kincardine staff have identified some of the organizational capacity building which would help the municipality to participate in the *Impact Assessment Act* process for the Bruce C Project. In keeping with the principles adopted by The Global Partnership and endorsed by Kincardine Council, the municipality has developed a Strategy Map, identifying the role the municipality can play as an enabler, supporting opportunities and systems that can generate value to support the desired outcomes associated with the Bruce C project.

Community Growth Planning

Planning for new growth in Ontario municipalities is a complex and multi-phased public process that can take several years, depending on the scale of development, community involvement, and regulatory requirements. The process involves several stages, from initial planning to final approval and implementation.

In total, the planning process for significant new growth in Ontario municipalities can take between 5 and 10 years, depending on the complexity of the project and the responsiveness of the community and stakeholders. This timeframe includes the development of key studies and plans that ensure growth is sustainable, well-serviced, and aligned with provincial policies. Additionally, the municipality needs to have funds to support key infrastructure projects to support growth and development at the right time.

Summary & Conclusion

The proposed Bruce C project has the potential to have a significant impact on the Municipality of Kincardine, the County of Bruce and other local municipal infrastructure and services, as well as broader community services delivered by other entities (e.g. local hospitals) and other levels of government (e.g. education).

It is expected that detailed socio-economic studies will be required to help support the growth management work related to the allocation of population and review of land supply needs for commercial and residential development. Municipal capacity funding is also expected in order to help support an understanding of delivery of services and assess infrastructure and service gaps and identify how such gaps could be addressed and by whom.

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:

- Housing – short- and long-term impacts
- Community and recreational infrastructure and services
- Growth and land use planning, including planning for commercial and industrial development
- Building approvals/permitting
- Water and wastewater infrastructure and management, and supports to ensure capacity is available to meet growth
- Roads and transportation infrastructure, as well as traffic and safety and winter maintenance and operations
- Waste management
- Transit
- Emergency management planning and response
- Emergency services (fire, police and paramedic services)
- Supports to deal with vulnerable populations
- Physician recruitment
- Economic development and workforce attraction
- Employment services
- Childcare and other social services
- Long-term care

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

As outlined in the submission above, the Municipality of Kincardine has historically been impacted by major infrastructure decisions at the Bruce Power site and we anticipate this will continue to be the case for the proposed Bruce C project. The Municipality looks forward to working collaboratively with Bruce Power, the Federal and Provincial governments, the nuclear industry, the IAAC and the CNSC to better understand potential impacts, both positive and negative, and collaborate to work through mitigative measures to address or enhance these impacts.