

January 30, 2024

The Honourable Seamus O'Regan
Minister of Labour and Seniors
Chair, Ministerial Working Group on Regulatory Efficiency for Clean Growth Projects
House of Commons
Ottawa, ON K1A 0A6

Re: Streamlining major project approvals for clean growth

Dear Minister O'Regan,

The Ontario Chamber of Commerce (OCC) is the indispensable partner of business and Canada's largest, most influential provincial chamber. It is an independent advocacy and member services organization representing a diverse network of 60,000 members. The OCC's mission is to convene, align and advance the interests of its members through principled policy work, value-added business services, and broad engagement to drive competitiveness and economic growth in the province.

We are writing to you today in your capacity as Chair of the Ministerial Working Group on Regulatory Efficiency for Clean Growth Projects to voice our support for a streamlined approval process for major energy infrastructure projects.

Specifically, we would like to echo Bruce Power's proposal to remove nuclear power projects from the Impact Assessment Agency Designated Project List and instead place those projects with the Canadian Nuclear Safety Commission (CNSC), given its existing function as a life-cycle regulator.

Canada's Impact Assessment process is critical to protecting people, the environment, and the rights of Indigenous communities. At the same time, the approvals process needs to be timely and efficient to enable Canada to meet its objectives of clean growth and energy security.

Bruce Power is currently undertaking a multi-billion-dollar Life Extension Program on six of its eight units. The project is expected to generate \$4-7 billion in GDP for Ontario and \$5-8 billion for Canada, support 22,000 direct and indirect jobs annually, and generate significant regional economic benefits through a supply chain of nearly 500 companies nationwide, most of which are in Ontario.

The company's operational brownfield site is equipped with ongoing data collection, analyses, and risk assessments which are regularly reviewed, approved, and regulated by multiple agencies, including the CNSC, Ontario's Ministry of Environment, Conservation and Parks, Fisheries and Oceans Canada, and Environment and Climate Change Canada.

In addition to the permitting process, Bruce Power's environmental monitoring program conducts extensive year-round sampling to verify the protection of the local environment. This includes water temperature and surface water quality sampling on site and in Lake Huron, and routine monitoring of air, precipitation, soil, sediment, groundwater, vegetation, agricultural products, and wildlife both on site, and in the surrounding areas.

Removing nuclear power projects from the Impact Assessment Agency Designated Project List, and placing them instead under the CNSC, would lead to less duplication and more efficient approvals, and would be safe given the regulator's strong history, technical expertise, and global reputation.

Therefore, we propose that the Government of Canada direct the Impact Assessment Agency of Canada to work with project proponents to focus the scope of the Tailored Impact Statement Guidelines (TISG) to only the most uncertain and meaningful project interactions, with a particular focus on Indigenous peoples' interests in the project and impacts that are not assessed via other federal or provincial processes.

Studies and assessments that were previously reviewed and accepted by regulatory agencies should be acknowledged in the TISG to eliminate duplication. This principle should apply to both projects at existing nuclear sites where previous assessments and studies have been completed, as well as projects proposing a reactor design that has already successfully completed an environmental or impact assessment for deployment in Canada.

Alternatively, if nuclear does remain within the existing Impact Assessment process, we propose several improvements to streamline approvals, including:

- Exempting nuclear expansion projects on existing licenced sites from the Impact Assessment Act;
- Allowing proponents to leverage previously accepted assessments and reports, including bounding plant performance envelopes for reactor designs;
- Creating a priority clean energy projects list to fast-track energy infrastructure projects critical to addressing electricity demand growth and decarbonization objectives; and
- Streamlining various aspects of the process, such as the Planning Phase, guideline development, and agency timelines.

We appreciate the opportunity to provide input into this important matter and look forward to working with your government to continue supporting Canada's clean growth objectives.

Sincerely,



Daniel Tisch, APR, FCPRS, ICD.D

President and CEO

Ontario Chamber of Commerce

CC:

The Hon. Gary Anandasangaree, Minister of Crown-Indigenous Relations

The Hon. François-Philippe Champagne, Minister of Innovation, Science and Industry

The Hon. Chrystia Freeland, Deputy Prime Minister and Minister of Finance

The Hon. Steven Guilbeault, Minister of Environment and Climate Change

The Hon. Patty Hajdu, Minister of Indigenous Services and Minister responsible for the
Federal Economic Development Agency of Northern Ontario

The Hon. Gudie Hutchings, Minister responsible for the Atlantic Canada Opportunities
Agency and Minister of Rural Economic Development

The Hon. Diane LeBouthillier, Minister of Fisheries, Oceans and the Canadian Coast Guard

The Hon. Jonathan Wilkinson, Minister of Energy and Natural Resources