

Agency File No: 89719

ELECTRONIC MAIL

August 22, 2025

Cliff Oliver
Vice President Development
WattBridge c/o PROENERGY
2001 PROENERGY Blvd
Sedalia, MO 65301
<email address removed>

Dear Cliff Oliver:

Subject: Summary of Issues for Centre Village Renewables Integration and Grid Security Project

The Impact Assessment Agency of Canada (IAAC) conducted a comment period from July 14 to August 13, 2025, to invite participants to provide their perspective on any issues that they consider relevant in relation to the Centre Village Renewables Integration and Grid Security Project (the project). All submissions received are available on the Canadian Impact Assessment Registry (the registry), Reference Number [89179](#).

A Summary of Issues (SOI) document, attached to the transmittal email, provides the key issues within federal jurisdiction that IAAC considers necessary, at this time, to support decision making on whether further assessment is required, under section 16 of the *Impact Assessment Act* (the IAA). A summary of other comments, advice, and recommendations from participants for consideration is included in the appendix to this letter.

If further assessment is required, the SOI and the proponent's response will inform the scope of the impact assessment, and the development of the Tailored Impact Statement Guidelines and plans, as appropriate.

As the SOI provides high-level summaries of comments received, IAAC encourages WattBridge to review the original submissions posted on the registry to facilitate the preparation of responses.

Pursuant to subsection 15(1) of the IAA, WattBridge must provide IAAC with a response that sets out how it intends to address the key issues provided in the SOI. A high-level description is sufficient. Where relevant, the proponent is encouraged to identify if the key issues will be addressed through existing legislative and regulatory frameworks (i.e. legislation or regulation), by proponent commitments to

best practices, policies or standards, or both.

IAAC is not requiring WattBridge to submit a Detailed Project Description at this time, given the information provided in the Initial Project Description for the project. If the scope or design aspects of the project have, or will be, changed from what was presented in the Initial Project Description, WattBridge should contact IAAC to discuss whether those changes affect the need for a Detailed Project Description.

IAAC is requesting your response to the SOI by **September 11, 2025**. WattBridge is encouraged to contact IAAC in the next few days to discuss how much time will be required to produce the response to the SOI. If more than 20 days is required, please notify IAAC in writing and request that IAAC suspend the time limit until the required information is provided.

WattBridge is reminded that all records produced, collected or received in relation to the impact assessment of the project – unless prohibited under the *Access to Information Act* – will be considered public and may be posted on the registry site for the project.

If you have any questions, please do not hesitate to contact me at 902-219-4228 or CentreVillage@iaac-aeic.gc.ca.

Sincerely,

<sent electronically>

Jeff Balsdon
Project Manager
Atlantic Regional Office

Enclosure:

Appendix – Other comments, advice, and recommendations – Centre Village
Renewables Integration and Grid Security Project

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IAAC is providing the following comments, advice, and recommendations for information purposes. The proponent is encouraged to consult the Canadian Impact Assessment Registry Internet site for the project (Reference Number 89719) to review the original comments.

Accidents and malfunctions

- Concerns that the project would be susceptible to flooding and extreme weather conditions, increasing the risk of an accident or malfunction.
- Concerns regarding potential spills and leaks and the need for a spill prevention and management plan.
- Concerns regarding the remote location of the facility and response time in the event of emergency, and the need for an emergency response plan.

Alternatives to the project / alternative means of carrying out the project

- Concerns about the apparent lack of consideration of alternatives to the project, such as investing in wind and solar power generation in combination with battery storage, importing hydroelectricity from out-of-province (i.e., Quebec), and prioritizing community-based and locally owned renewable energy resources.
- Concerns about how the project site was selected and whether environmental constraints were adequately considered.

Archaeological and cultural heritage resources

- Concerns regarding the location and adequacy of the archaeological surveys within the project area.

Climate change and greenhouse gas emissions

- Concerns regarding greenhouse gas generation through the combustion of natural gas and implications for hindering Canada's ability to meet its environmental obligations and global commitments in respect of climate change and contributing to adverse effects of climate change such as wildfire, drought and extreme weather events.
- Concerns about factors considered in the greenhouse gas estimates, including information or description of potential impacts on carbon sinks in the project footprint.

Cumulative effects

- Concerns about potential cumulative effects of the project on air quality, water quality, biodiversity, and community well-being.

Indigenous Peoples' health, social, and economic conditions

- Concerns about potential impacts to Indigenous Peoples engaging in traditional land use activities that may be exposed to dust, herbicide use, and contaminants from air emissions and effluent discharge during project operations.

Non-Indigenous communities' health, social and economic conditions

- Concerns about potential impacts on community health and well-being (i.e., physical, mental and cultural) due to project-related emissions (i.e., noise and air), environmental degradation (e.g., drinking water quality and quantity), and road safety risks.
- Concerns about the potential adverse impacts on property values, local agriculture and livestock, nature-based activities and tourism (e.g., fishing, birding, trails, eco-tours), local businesses, and rural road conditions and maintenance costs.

Permits, authorizations and guidance

- Potential need for an Aeronautical Assessment Form (AAF) to be completed to manage lighting and marking requirements for the proposed stacks and cranes. Review the applicable Canadian Aviation Regulations and AAF for Obstruction Marking and Lighting.
- Need for proponent to review the Federal Guidelines for Stationary Gas Turbines, which provide standards and expectations for NO_x control that are applicable to the project.
- Need for proponent to consult with Fisheries and Oceans Canada and Environment and Climate Change Canada with respect to the potential need for a *Fisheries Act* Authorization for the discharge of effluent into potential fish-bearing waters.

Project design and project considerations

- Concerns regarding whether the facility would still consume fuel when operating in voltage support or grid stability mode and the feasibility of converting the facility to hydrogen.
- Concerns regarding the project's operation capacity and duration (i.e., whether the facility could generate more power than estimated, operate beyond 25-year lifespan, and potentially send power out of province).
- Concerns regarding the limited detail on site restoration plans and potential remedial activities following decommissioning of the project.
- Concerns regarding the lack of a comprehensive water management plan, including alternative sources of water in the event of water shortages.

Species at risk

- Concerns regarding the potential adverse effects on species at risk, including the loss and fragmentation of their habitat, and sensory disturbance from increased noise and light emissions.
- It was noted that the project footprint overlaps with Bobolink critical habitat, which is listed as a Schedule 1 of the *Species at Risk Act*. The proponent must manage activities to ensure compliance with the *Species at Risk Act* and associated regulations.

Terrestrial wildlife and their habitat

- Concerns regarding potential impacts to regional biodiversity, wildlife corridors (e.g., for moose, lynx and others) and sensitive ecosystems, particularly impacts to the Bay of Fundy Biosphere Region, the Tintamarre National Wildlife Area, and the Chignecto Isthmus Ecological Corridor between New Brunswick and Nova Scotia.

Wetlands

- Concerns regarding the loss of, and disturbance to, wetlands and their functions (e.g., flood control, carbon sequestration and climate regulation, wildlife habitat) in the project area due to wetland removal, air and noise emissions, and effluent discharge, and the limited information on measures to mitigate potential impacts.