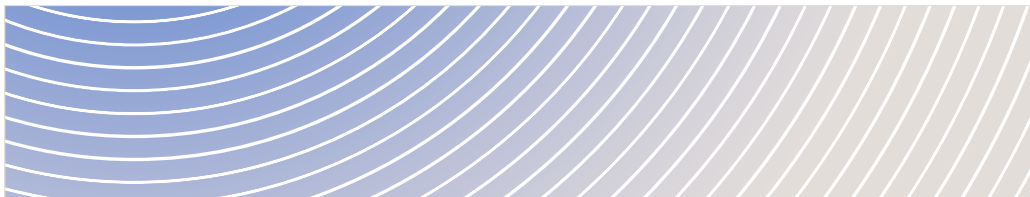




Impact Assessment
Agency of Canada

Agence d'évaluation
d'impact du Canada

Detailed Permitting Plan



ONTARIO PUMPED STORAGE HYDROPOWER PROJECT

SEPTEMBER 1, 2026 (VERSION 1.0)

Canada 

1. Detailed Permitting Plan Agreement & Approval

The following sets out agreed upon timelines for obtaining the federal permits required to begin construction. The proponent's timeline and schedule are outlined in Section 8 Proponent's Anticipated Schedule. Detailed steps and timelines for each permit are provided in Table 1 and Annex A: Detailed Milestones and Timelines for Federal Permits. Note Q1, Q2, Q3, and Q4 refer to calendar quarters.

Federal Authority - Federal Permit	2026				2027				2028				2029			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Impact Assessment Agency of Canada – <i>Impact Assessment Act</i> Decision	PD	C	C	C	IS/C	IS/C	IS/C	IS/C	IS/C	C	C	D	-	CS	-	-
Department of National Defence – Ministerial Decision	A	C	C	C	A	A	C	C	C	C	C	D	-	CS	-	-
Crown Indigenous Relations and Northern Affairs & Indigenous Services Canada – <i>Dominion Water Power Act</i> (DWPA) Interim License	A	C	C	C	C	C	C	C	C	C	C	C	D ¹	CS	-	-
Environment and Climate Change Canada – <i>Species at Risk Act</i> (SARA) Permit	-	-	-	-	-	A	C	C	C	C	C	C	D	-	CS	-
Department of Fisheries and Oceans – <i>Fisheries Act</i> Authorization (FAA)	-	-	-	-	-	A	C	C	C	C	C	C	D	-	CS	-
Transport Canada - <i>Canadian Navigable Waters Act</i> (CNWA) Approval of work(s) on navigable water	-	-	-	-	-	-	-	A	C	C	C	C	D	-	CS	-

Legend:

PD: Proponent submits Project Description to IAAC

IS: Proponent submits draft Impact Statement (IS) documentation to IAAC. Consultation to continue in tandem with the submissions of the IS.

A: Proponent submits comprehensive application/required information to the appropriate regulatory federal authority. Submissions may be comprehensive draft applications to begin the permitting process for SARA, FAA and CNWA.

C: Indigenous Consultation for the permit or the Impact Assessment

D: Decision for the permit or the Impact Assessment



D1: Issuance of the DWPA licence must occur concurrently with approval of the land-use agreement between the Crown and TCE. Accordingly, the decision date for the DWPA will be dependent on the progression and approval of the land-use agreement.

CS: Construction Start for activities that require federal permits.



2. Project Description

TransCanada Energy Ltd. (TC Energy) is proposing to construct and operate a pumped storage hydropower facility located at the Department of National Defence's Army Training Center – Central (ATC-C) (formerly 4th Canadian Division Training Centre) near Meaford, Ontario, on Nottawasaga Bay. As proposed, the project would store excess electricity from the grid by moving water from the bay to a reservoir, that would then be released back to the bay to generate electricity during periods of demand. It will have a production capacity of 1000 megawatts and will operate indefinitely.

3. Purpose of the Plan

The Government of Canada has provided clear direction to federal departments to accelerate decision-making processes for federal authorizations required for projects to get to construction. Federal departments will work together to provide:

- Clarity on permitting requirements, timelines and processes through the development of detailed federal permitting plans
- Transparency through public reporting on the progress of permitting on the Canadian Impact Assessment Registry; and
- A point of contact within the Impact Assessment Agency of Canada and centralized support from the Government of Canada

The purpose of this detailed permitting plan is to identify the federal regulatory instruments including permits, licences and authorizations (collectively referred to as 'permits') that may be required for the project to commence construction. It also lays out anticipated milestones and timelines and identifies any Indigenous or public consultation that may be a part of the process. It will also provide guidance on the information proponents must provide to inform the process.

To achieve the aforementioned, this document lays out a workplan and timeline to complete the impact assessment and federal permits required to commence construction. It also details what proponents will need to do to support an efficient regulatory process to meet the targets (see Conditions of Participation).

This permitting plan is not a legal document and does not change any existing federal, provincial, or Indigenous legislative or regulatory jurisdiction, right, power, privilege, prerogative or immunity by virtue, nor does it create any new legal powers, duties or legally binding obligations. While this document is meant to guide federal permitting for the project, it is not intended to be exhaustive, restrictive, nor legally



binding on any of the parties. As such, nothing in this document should be considered to interfere with or fetter the discretion of federal regulators, carrying out their responsibilities. Regulators' obligations and service standards are described elsewhere. In the event of any inconsistency between this plan and regulators' legal obligations, the latter shall prevail.

4. Conditions of Participation

To meet the target, agreed to with the proponent, for completion of the major project review process, the proponent must be willing and able to meet the following conditions:

- **Ready to start:** The proponent must be ready to submit application(s) as per the anticipated timelines set out in this detailed permitting plan.
- **Provide Comprehensive Applications:** The proponent must make best efforts to submit comprehensive applications for federal permits that meet the requirements set out by the responsible departments and agencies.
- **Active Participation:** Actively participate in the permitting process including providing required information and promptly responding to requests for additional information or clarification from federal departments and agencies or from Indigenous communities.
- **Engage with Indigenous Communities:** The proponent must follow best practices when establishing relationships and engaging with Indigenous communities and have documented and addressed concerns.
- **Public Disclosure:** The proponent consents to having the status of its permitting processes, shown on a public permitting dashboard on the Canadian Impact Assessment Registry.

5. Roles and Responsibilities

The roles and responsibilities related to permitting coordination are:

Impact Assessment Agency of Canada (IAAC) will:

- integrate permitting coordination into the impact assessment, where applicable, and seek areas for efficiency between the impact assessment and other federal regulatory processes;
- maintain and update the detailed permitting plan, as necessary;



- provide relevant information from the impact assessment of the project to federal departments to inform their regulatory processes;
- provide a primary point of contact for proponents and federal departments to address issues that may require coordination among multiple departments.
- track the progress of the permitting processes on the public permitting dashboard on the Canadian Impact Assessment Registry;
- act as Crown Consultation Coordinator to facilitate a collaborative approach to Indigenous consultations by federal departments related to permitting; and
- work with federal departments and the proponent to meet the timelines described within this document.

Federal departments will:

- conduct permitting as per their respective legislative or regulatory requirements;
- provide information relating to the regulatory and statutory responsibilities of their department;
- review information provided by proponents during the impact assessment and update information on permitting as appropriate;
- determine, to the best of their ability, whether a permit is required under their respective legislation, based on the information provided by the proponent;
- provide feedback as to what information must be provided to support sound and timely regulatory decisions;
- carry out Indigenous consultation, as well as any public consultation, as required;
- notify IAAC of issues that arise and any changes in anticipated timelines, as early as possible;
- maintain communication with the proponent through applicable regulatory or permitting processes; and,
- work with IAAC and the proponent to meet the timelines described within this document.

The Proponent will:

- prepare the appropriate applications for the permits required for the project to commence construction and submit applications as per the anticipated timelines set out in Table 1 and Annex A;



- provide required information and respond to any requests for additional information or clarification from federal departments or IAAC;
- support IAAC and federal departments during Indigenous consultations;
- liaise with IAAC and federal departments on anticipated schedules for applications and any issues that may arise and notify IAAC and relevant federal departments as soon as possible to any changes in anticipated submission dates (for example, notification 90-30 days prior to any changes is preferable);
- notify IAAC and federal departments of any major or substantial changes to project design, as early as possible;
- be aware of changes to legislation that may change the need for a permit;
- fulfill the conditions for participation; and
- work with IAAC and federal departments to meet the timelines described within this document

6. Federal Permits that may be required to start construction

Information about federal permits that may be required for construction can be found in Table 1. These permits will be tracked on the public permitting dashboard on the Canadian Impact Assessment Registry.

The list of permits needed for construction is based on information provided by the proponent, may not be exhaustive and is subject to change. The Government of Canada may revise the plan to accommodate any changes to the project or in response to new information from the proponent, federal departments or other participants in the impact assessment or permitting process. Proponents should be aware that other federal legislation or regulations may apply to their project, including permits that may be required after construction has begun or which have requirements to follow throughout the life of the project.

This document will be updated by IAAC, as necessary, based on a review of the impact statement submitted by the proponent.

Federal departments are prohibited from issuing permits until a positive decision statement is issued by the Minister to the proponent, under section 8 of the *Impact Assessment Act*. The proponent, however, is encouraged to develop federal permit applications and/or apply for federal permits concurrently with the impact assessment. Information and consultation requirements for permits may be



completed at the same time as the impact assessment and the same information may, in many instances, be used to inform both processes. Collecting and providing permitting information during the assessment process may expedite subsequent federal decisions, should the impact assessment decision be positive.

7. Engaging and Consulting with Indigenous Communities

The proponent is expected to begin engaging with Indigenous communities as early as possible to establish meaningful relationships built on respect, trust, and collaboration. Refer to [Guidance for proponents: Early engagement with Indigenous Peoples in impact assessments under the Impact Assessment Act - Canada.ca](#) for additional resources. This includes Indigenous communities that may be affected by specific components of a permit (i.e., affected based on the location of a fish habitat compensation plan).

By engaging Indigenous communities early on, proponents develop an understanding of concerns and an ability to address them at the outset. This proactive approach also promotes ongoing dialogue, where concerns and mechanisms to address these concerns can be integrated into projects. This approach also helps identify potential issues before they become significant challenges and creates an environment where Indigenous communities can be involved in shaping the future of projects. The proponent is also encouraged to provide the requested information to federal departments as early as possible to allow these regulatory bodies to begin consulting with Indigenous communities on permitting processes as early as possible.

Federal departments, along with the Crown Consultation Coordinator, will work together to ensure a collaborative and coordinated approach to consulting with Indigenous communities. The Crown consultation coordination process will, with input from Indigenous communities, aim to reduce the consultation burden and duplication for Indigenous communities across regulatory and permitting processes.

The [Indigenous Engagement and Participation Plan](#) (IEPP) describes the possibilities and methods for meaningful engagement and consultation with Indigenous communities who may be affected throughout the impact assessment process.

8. Proponent's Anticipated Schedule



TC Energy (TCE) proposes a phased approach to providing information required to inform federal permitting decision making for the Ontario Pumped Storage Hydropower Project. The approach would occur in three phases to align with development of the Project's footprint and assessment of potential effects associated with that footprint. TCE intends to submit Information and Studies chapters and associated technical data reports as they become available, as opposed to submitting all materials at once. TCE has set the following schedule for submission of permit applications and its target for start of construction. Note Q1, Q2, Q3, and Q4 refer to calendar quarters.

- TCE has been undertaking baseline environmental studies since 2019. Depending on the exact requirements identified in the forthcoming [Tailored Information and Studies Guidelines](#), TCE anticipates beginning to submit draft Impact Statement documentation to the IAAC in Q1 2027, with the submission of the final Impact Statement anticipated in Q1 2028.
- TCE anticipates providing draft permits for the following items in proximity to the filing of supporting effect assessment documentation:
 - *Species at Risk Act*
 - *Fisheries Act*
 - *Canadian Navigable Waters Act*
- Phase 1 – Comprehensive draft permit applications submitted in Q2-Q4 2027. These applications will include technical information currently available at time of submission, including information on the footprint of the Project and the Project's approach to constructing and operating said facilities. As part of this phase, draft permits would present potential mitigation options, and if applicable, potential compensatory measures to address identified effects stemming from the assessment of effects found in the draft Impact Statement documentation and associated technical reports.
- Phase 2 - Provide an update on any Project footprint and construction methodology changes that result from the completion of Front-End Engineering and Design (FEL3) to be completed in Q4 2027. This phase would also see revisions to draft permit applications that would incorporate feedback generated during Phase 1 from regulators and external stakeholders, as appropriate, including additional details on mitigation measures and anticipated levels of compensatory measures. This phase would occur in Q2 2028, approximately 4 months after TC Energy has submitted a complete Impact Statement.
- Phase 3 - Provide final versions of any necessary permit application materials, considering any feedback developed during Phase 2 from regulators and external stakeholders and detailed in the Impact Assessment decision issued by the Minister of the Environment, Climate Change and Nature. As such, this phase would occur in Q4 2028, approximately 1 month after the IA decision is issued.



- TCE has filed for an Interim Licence under the *Dominion Water Power Act* alongside the submission of the Initial Project Description in March 2026. TCE anticipates providing a number of updates to this application on engineering and commercial aspects of the Project.
- TCE has been working with DND regarding the footprint of the Project, and different approaches to the construction and operation of the Project within ATC-C since 2020. TCE has been providing updates to DND on specifics of the Project during this time, aligning with advancement of engineering of the Project. TCE expects to provide more refined Project specifications as it completes Front-End Engineering and Design (FEL3) over the next 18 months.
- TCE aims to commence construction of the Project in late Q2 2029, with initial works focusing on the establishment of temporary construction support facilities and unexploded explosive ordnance (UXO) clearance. Once these activities have been advanced, TCE will commence construction of the Reservoir and Main Access Tunnel.

9. Contact Information

During the impact assessment, the proponent should direct any inquiries to the IAAC office designated for administering the impact assessment of the project.

For the Ontario Pumped Storage Hydropower Project, please contact:

Impact Assessment Agency of Canada
Ontario Regional Office
55 York Street, Suite 600
Toronto, ON M5J 1R7
Phone: 416-952-1576
Email: Nottawasaga@iaac-aeic.gc.ca

If a Decision Statement with conditions is issued, allowing the project to proceed, the proponent should continue to direct permit inquiries to the appropriate federal department conducting the permitting process.

Inquiries related to the coordination of federal permitting may be directed to the IAAC Permitting Coordination Team at permitting.coordination.permis@iaac-aeic.gc.ca

Department of National Defence contact:

- Meaford Project Management Office
Director General Portfolio Requirements
Assistant Deputy Minister of Infrastructure and Environment (ADM (IE))
Email: psp4cdtcconsultationspspci4div@forces.gc.ca



Crown-Indigenous Relations and Northern and Arctic Affairs Canada contact:

- Dominion Water Power Act
Water Management Division
Email: lfhc-dwpa@rcaanc-cirnac.gc.ca

Department of Fisheries and Oceans contact:

- Fish and Fish Habitat Protection Program
Ontario and Prairie Region
Winnipeg, Manitoba
Email: FisheriesProtection@dfo-mpo.gc.ca

Environment and Climate Change Canada contact:

- ECCC welcomes focused and collaborative conversations between SARA Permitting Officers in ECCC's regional offices and the proponent if additional information is required. In Ontario, please reach out to:
wildlifeontario@ec.gc.ca

Transport Canada contacts:

- Transport Canada Environmental Programs
Ontario Region
Email: enviroont@tc.gc.ca
- Transport Canada Navigation Protection Program
Email: nppont-ppnont@tc.gc.ca

Natural Resources Canada contact:

- Explosives Regulatory Division
National Headquarters
Ottawa Ontario
Tel.: 1-855-912-0012
Email: ERDmms@nrcan.gc.ca

Table 1 – Federal Permits that may be required to begin construction

Act and Regulatory Instrument Responsible Authority	Requirement Status & Overview	Anticipated Duration	Public Engagement Opportunities	Indigenous Consultation	Project Specific Information Requirements and Guidance
Impact Assessment Act Decision Statement issued under s.65(1) of the <i>Impact Assessment Act</i> (IAA) Impact Assessment Agency of Canada (IAAC)	Required IAAC has determined that an impact assessment is required for this project. Under subsection 60(1) of the IAA the Minister of the Environment, Climate Change and Nature makes a determination on whether the project is likely to cause significant adverse federal effects to some extent, and whether they are justified in the public interest. The Minister informs the proponent of the determination in the Decision Statement issued under subsection 65(1) of the IAA.	Federal decision: As legislated, no later than 300 days plus 30 to 90 days after the submission of a complete Impact Statement	Public consultation on the draft Impact Assessment Report and potential conditions. Other public engagement activities as needed.	Indigenous communities to be engaged and consulted as detailed in the Indigenous Engagement and Participation Plan .	The Tailored Information and Studies Guidelines (TISG) describe the information to be submitted in the Impact Statement to meet the requirements of the IAA.



<i>National Defence Act</i> Minister of National Defence Determination Department of National Defence (DND)	Required Under the <i>National Defence Act</i> (NDA) the Minister of National Defence has the management and direction of the Canadian Armed Forces (CAF) and all matters relating to National Defence, including real property, and is responsible for the construction and maintenance of all defence establishments and works for the defence of Canada. The 2021 signed Agreement in Principle (AIP) with TCE and DND states that the Minister of National Defence will decide if the project can be accommodated at ATC-C without CAF effects after the following are completed. 1. For the portion of land where DND infrastructure will potentially be relocated - IAA S. 82 Environmental Effects Determination (EED); 2. For the CAF Effects related to the construction and lifecycle of the project - CAF Operational Impact Assessment (OIA); and 3. For the project - Positive Impact Assessment Determination under the IAA of the TCE OPS.	Federal decision: Ongoing and will align with the Impact Assessment decision since it is dependent on the outcome of that decision. Requires 90 -120 days after complete submission of all information requirements. Additional time may be required and will be dependent on DND review. Project Footprint of all components on DND land required in Q1 2026 Proponent Construction Sequencing Plan required in Q1 2027	DND intends to participate in IAAC Engagement Opportunities to address DND specific questions and concerns. Other public engagement activities as needed. Public Engagement through the Canadian Impact Assessment Registry and other venues for the S. 82 Environmental Effects Determination of Relocated Infrastructure.	Indigenous communities to be consulted with respect to land use agreement/ Real Property instrument.	The Minister of National Defence Determination is dependent on TCE providing timely, adequate, and accurate information during all phases of the project so that impacts at ATC-C and the CAF can be assessed. The project must not impede: - CAF mobility on site - emergency responder access and response times, - ammunition use and storage, - fire response and potable water supply, and - the ability of ATC-C residents to have adequate rest and enjoyment. At this time, limited information has been provided to DND to assess impacts to ATC-C. Impacts on human health, safety, emergency management, equipment, infrastructure, or operations that may impact DND land or interfere with CAF health and safety, operations or communications must be provided so DND can assess impacts to CAF operations and understand impacts to DND personnel. The required
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	Note that the relocation of DND infrastructure is independent of the project. DND will seek its own permits from regulators. Note that the proposed project sits on ATC-C, which is DND land. DND holds land because of its mandate under the NDA. A land use agreement/Real Property instrument between proponent and the Crown will be required concurrent with the DWPA interim licence and must be in place before the proponent can begin construction.	Impacts and mitigation plans required in Q2 2027			information must be provided by the proponent either through the Impact Statement or directly to DND (note that a formal request for review in writing must be submitted to DND in relation to each of the information requirements). See Annex B for details. DNDs Federal Advice Authority Record provides additional information. In addition, on-going consultation with DND is required and may identify additional information requirements.
<i>Dominion Water Power Act</i> Interim Licence issued under section 8(1) and Final Licence under s. 25(1) Indigenous Services Canada (ISC)	Required The <i>Dominion Water Power Act</i> (DWPA) and <i>Dominion Water Power Regulations</i> (DWPR) authorize the development and use of water-powers on federal land. Responsibility of the Act falls under the purview of the Minister of ISC, however, the administration of the Act, including technical review of water power licence applications, regulatory coordination, and recommendations for ministerial	Federal decision: There are two possible processes for the granting of the Interim licence. 1. Administrative Process: Where the application can proceed within the existing DWPA and its regulations. An interim licence is	As necessitated under the DWPR, the proponent had their application notices published in both the Canada Gazette and the Meaford Independent for comments on March 6, 2026, for public comments. Members of the public and	During the analysis and before the regulatory decision, CIRNAC may undertake Indigenous Consultation in respect to the proposed structure and operations.	In addition to the application that was submitted in March 2026, the following information must be provided by the proponent either directly to CIRNAC or through the Impact Statement: • Front-end loading 2 (FEL2) engineering plans (i.e., the preliminary design and engineering plans) • a dam safety plan • an emergency response and/or preparedness plan, • a maintenance and monitoring plan



& Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)	decision are performed by CIRNAC's Northern Affairs Organization. The DWPR may grant two major authorizations. The first is an Interim Licence, which is required for project construction, and second is a Final Licence, which grants the long-term operation of the facility after construction is complete.	typically issued up to 1.5 years following receipt of an interim licence application. 2. Regulatory process: Where additional considerations arise, such as the need to address interests or arrangements involving Indigenous communities, the Governor in Council may establish new regulations which go beyond the scope of the DWPR, which will require additional time to process (beyond 1.5 years). The duration of certain key steps described in Annex A may vary	Indigenous communities had 30 days from the publication of the notice in the Canada Gazette to submit comments or concerns through the IAAC's project specific registry page. A report summarizing the feedback received during the initial comment period will be shared with the Minister of ISC. The Minister has discretion to determine whether a public hearing is warranted. If warranted, the Minister of ISC will then make a public interest decision based on the outcomes of the public hearing and	CIRNAC will closely monitor comments received through both the public comment period and the public hearing for concerns raised by Indigenous communities. The Minister of ISC will evaluate concerns left by all Indigenous communities before granting either of the licences to the proponent.	• construction sequencing plan • FEL3 engineering plans (i.e., the detailed design and engineering plans)
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		depending on the proponent's response time and the need for consultation. The decision date for the DWPA could be delayed due to the requirement of a land use agreement / Real Property instrument with the Crown. These arrangements are typically linked to the issuance of the licence.	the findings of the technical review of the application. CIRNAC will Coordinate with IAAC, when possible, to leverage established impact assessment public consultation/ engagement processes.		
<i>Species at Risk Act (SARA)</i> Permit or Agreement under Section 73 Environment and Climate Change	Required The Project activities will occur in SAR habitat and will incidentally affect SAR at ATC-C (federal land). Based on the current project design, a SARA permit will be required for: - Butternut (individuals) - Western Chorus Frog, Great Lakes / St. Lawrence -	ECCC encourages proponents to submit clear and complete permit applications at least 6-8 months prior to the anticipated start of activities that require a SARA permit.	No engagement opportunities	During the analysis and before the regulatory decision, ECCC may undertake Indigenous consultation as required by s.73(4) and s.73(5) of SARA	Meaningfully addressing effects to species at risk and avoiding negative effects to their survival or recovery is central to permitting decisions made under SARA. Notably, before a permit can be issued the SARA requires that all three pre-conditions under subsection 73(3) of SARA be met:



Canada (ECCC)	Canadian Shield population (WCF) (individuals and residences) - Little Brown Myotis, Northern Myotis, and Tri-coloured Bat (SAR bats) (residences) A SARA permit may be required for Monarch and a plant species at risk individuals and possibly Red-headed Woodpecker residences. The Red-headed Woodpecker is also a migratory bird. A SARA permit is unlikely to be required for other SAR migratory birds. Under SARA it is prohibited to harm an individual, its residence or critical habitat (where critical habitat has been protected through an order or Gazette Statement) for: a) Migratory bird species at risk anywhere in Canada b) Any listed species at risk on federal land. The Competent Minister may issue a permit authorizing an activity that would violate the SARA prohibitions,	Submitting an application as early as possible in the impact assessment process allows opportunities to identify potential issues and consider solutions.		and the duty to consult under s.35 of the Constitution Act, 1982	- 73(3)(a) all reasonable alternatives to the activity that would reduce the impact on the species have been considered and the best solution has been adopted - 73(3)(b) all feasible measures will be taken to minimize the impact of the activity on the species or its critical habitat or the residences of its individuals - 73(3)(c) the activity will not jeopardize the survival or recovery of the species. See Annex C for details. Cumulative effects will be taken into account through the permitting process. Please refer to <i>Project planning: Applying for a Species at Risk Act (SARA) permit administered by Environment and Climate Change Canada (ECCC)</i> for additional information on the SARA prohibitions. (provided separately via email). ECCC welcomes focused and collaborative conversations between SARA Permitting Officers in ECCC
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	if affecting the species is incidental to carrying out the activity. It is important for proponents to ensure their understanding of their obligations under SARA is current. Please note additional authorizations may be necessary if: • SARA prohibitions come into force in the future. • Over the course of the assessment, or after the assessment, additional species could be listed under SARA and a permit may be required for project activities that affect these additional species Proponents are advised to monitor for such development on the SARA registry: https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html				regional offices and the Proponent if additional information is required.
Fisheries Act Authorization under paragraphs 34.4(2)(b) and	Likely Required For any works, undertakings, or activities that are likely to result in death of fish and/or harmful	Federal decision: 12-24 months after application submitted.	No engagement opportunities	DFO will consult with Indigenous nations on potential impacts to their Aboriginal	A detailed estimate of residual effects including the potential harmful alteration, disruption, or destruction of fish habitat (during construction) and death of fish numbers (during



35(2)(b) of the <i>Fisheries Act</i> Fisheries and Oceans Canada (DFO)	alteration, disruption or destruction of fish habitat. Works that have been identified that have the potential to impact fish and fish habitat: - Construction of lower inlet/outlet structure - Construction of temporary dock - Construction of access roads spanning watercourse crossings - Construction of upper reservoir - Operation of lower inlet/outlet structure - Installation of transmission line structures For more information on the process please visit Project planning: Applying for a Fisheries Act authorization	A one-year timeframe is generally sufficient for reviewing a complete application and decision making. However, for a project with this scope and complexity the review may take more than a year to complete. The duration of certain key steps described in Annex A may vary depending on the proponent's response time.		or Treaty rights prior to making a decision with respect to issuing an authorization.	operations due to impingement and entrainment) will be required to determine whether a <i>Fisheries Act</i> paragraph 34.4(2)(b) and/or 35(2)(b) authorization for the project is required, as well as to calculate associated offsetting measures. Information requirements include, but are not limited to: - design drawings that indicate disturbance footprints, size and location of intake(s), - proposed water intake quantities and rates, - screen sizes, - site-specific habitat type, - productivity, sensitivity, and species presence. DFO recommends that the proponent submit a Request for Review form for review under the <i>Fisheries Act</i> as early as practical to begin discussions. Guidance on requesting a review can be found at: Request a review of your project near water
Canadian Navigable Waters Act	Likely Required	Federal decision:	Proponent must publish a notice	If the proposed work triggers the legal duty to consult with	Based on information provided to date, it is unclear whether the proposed works would be classified as minor works. If the works are



Approval for work in a Scheduled Water 5(1)(b) Transport Canada (TC)	Approval for a proposed major work in any navigable waters that may interfere with navigation. Approval for a proposed work, other than a designated minor work, in a Scheduled Water that may interfere with navigation Georgian Bay, which is identified as part of the project, is listed on the Schedule to the CNWA and therefore is a navigable waterway that is subject to the regulatory requirements under the CNWA. If the proposed work is a Minor Work (as designated under the Minor Works Order under the CNWA) then no approval is required. In-water works that have been identified that may require an approval: - Dock - Intake/outtake For more information, please visit Apply to the Navigation Protection Program	up to 12 months after application submission The duration of certain key steps described in Annex A may vary depending on the proponent's response time.	about the proposed work for review. Interested parties are invited to provide comments within 30 days after the publication of the notice or within any other period specified by the Minister of Transport. The owner will be directed by TC as to when and where the notice shall be published. Coordination with impact assessment process is possible to utilize open houses and joint publication requirements.	Indigenous nations, the proponent may need to provide detailed information necessary to ensure consultations are adequate.	deemed not minor, then an application for Approval will be required. Docks and boathouses that meet the following criteria are designated as minor works: a) The dock or boathouse is situated 5 m or more from the adjacent property boundaries and property line extensions; b) The dock or boathouse is situated more than 10 m from any work that is in, on, over, through or across the navigable water and that is not owned by the owner of the dock or boathouse; c) The dock or boathouse is situated 30 m or more from a navigation channel or, if there is no navigation channel, is not situated in, on, over, through or across a navigation route; d) The dock or boathouse does not extend into, onto, over, through or across the navigable water: (i) to the length of a similar dock or boathouse within 100 m or less, on the same bank, from
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					the dock or boathouse, to a maximum length of 50 m, or if no similar dock or boathouse within 100 m (ii) to a maximum of 30 m; e) The dock or boathouse does not occupy more than one-third of the width of the navigable water; f) The dock or boathouse is not associated with an existing or proposed work, unless the existing or proposed work is a minor work; and g) The dock or boathouse is not used for float planes or other aircraft equipped with floats. Outfalls and water intakes that meet the following criteria are designated as minor works: a) The outfall or water intake does not extend vertically above the bed of the navigable water more than: (i) in the case of a navigable water of less than 15 m in depth, 5% of the depth of the water, or (ii) in any other case, 1 m; b) The outfall or water intake does not alter either the level or the
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					flow of the navigable water to the point of interfering with navigation; c) The outfall or water intake is more than 30 m from a navigation channel; and d) The outfall or water intake is not associated with an existing or proposed dam, weir or an existing or proposed reservoir of water created by the construction of a dam or weir.
Explosives Act and Explosives Regulations Explosives Licence Natural Resources Canada (NRCan)	Likely Required Explosives Licence required for storage of explosives. For more information, please visit Explosives - Natural Resources Canada Note: As this permit is not a long lead permit it has not been included in Section 1.	Federal decision: Magazine licence (storage) must be issued within 30 days from receiving a complete application.	No public engagement opportunities	NRCan may engage Indigenous communities once an application is received to determine if there are concerns, questions or requests for more information.	Based on Information provided to date, NRCan will require more information (such as, location of magazine storage) to determine if an explosives licence will be required.
Migratory Bird Convention Act	Potential Given information to date, ECCC is uncertain whether a permit under the MBCA will be required. Therefore,	Most Damage or Danger permit decisions are made within 35 calendar days.	No engagement opportunities	Consultation as necessary.	Proponents are reminded to develop beneficial management practices and measures to reduce risk to contravening the MBCA.



<i>Migratory Bird Regulations 2022 (MBR)</i> <i>ECCC</i>	timing and steps have not been included in Section 1 or Annex A. The <i>Migratory Birds Convention Act</i> (MBCA) and its regulations protect migratory birds and their eggs and prohibit the disturbance, damage, destruction or removal of migratory bird nests that contain a live bird or a viable egg. Migratory birds are protected at all times; all migratory bird nests are protected when they contain a live bird or viable egg; and the nests of 18 species listed in Schedule 1 of the <i>MBR</i> are protected year-round. These general prohibitions apply to all lands and waters in Canada, regardless of ownership. The MBCA also prohibits the deposit of substances that are harmful to migratory birds in waters, or an area frequented by migratory birds or in a place from which the substance may enter such waters or such an area. There is no mechanism available to provide a permit for activities that do not directly target but may harm	More information including the application form can be found at: https://www.canada.ca/en/environment-climate-change/services/migratory-bird-permits/application-forms.html			More information can be found here - Avoiding harm to migratory birds: https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds.html Proponent should confirm if the nests of any migratory birds listed on Schedule 1 will potentially be affected by this proposed project. If so, they should notify ECCC through the <u>Abandoned Nest Registry</u>, as soon as possible to begin the required monitoring period. Some examples of Schedule 1 birds that may be found in the project area include: • Great Blue Heron • Great Egret • Green Heron • Black-crowned Night Heron • Pileated Woodpecker In certain, limited situations, a permit to relocate or destroy a nest when it contains a live bird or egg, or, for species listed on Schedule 1 of the <i>MBR 2022</i>, before the designated waiting period has ended, may be available. Specific conditions must be met in order for one of these permits to be issued, including certain
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	protected migratory birds, their nests, and/or eggs (e.g., vegetation clearing) under the MBCA and its regulations. A Damage or Danger permit under the MBR authorizes permit holders to scare migratory birds, destroy eggs or nests, relocate birds or their nests, or kill birds in instances where the birds, nests, or eggs are causing damage to property or threaten public health and safety. Damage or Danger permits are available in certain limited situations and applications are evaluated on a case-by-case basis.				avoidance and mitigation measures. These permits are evaluated on a case-by-case basis.
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Annex A – Detailed Milestones and Timelines for federal permits

Decision statement issued under s.65(1) of the <i>Impact Assessment Act</i> (IAAC)	Quarter and Year											
	Q1 2026	Q2 2026	Q3 2026	Q4 2026	Q1 2027	Q2 2027	Q3 2027	Q4 2027	Q1 2028	Q2 2028	Q3 2028	Q4 2028
1. Planning Phase	P	IAAC/P	IAAC	-	-	-	-	-	-	-	-	-
2. Impact Statement Phase	-	-	-	P	P	P	P	P	P	-	-	-
3. Impact Assessment Report Phase.	-	-	-	-	IAAC	IAAC	IAAC	IAAC	IAAC	IAAC	IAAC	-
4. Indigenous Consultations	IC	IC	IC	IC	IC	IC	IC	IC	IC	IC	IC	-
5. Decision Phase	-	-	-	-	-	-	-	-	-	-	-	IAAC
Legend: P = Proponent IAAC = Impact Assessment Agency of Canada IC = Indigenous consultation-related activity												

Minister of National Defence Determination Processes and Steps (DND)	Quarter and Year											
	Q1 2026	Q2 2026	Q3 2026	Q4 2026	Q1 2027	Q2 2027	Q3 2027	Q4 2027	Q1 2028	Q2 2028	Q3 2028	Q4 2028
6. Proponent provides geolocated footprint of all components on DND land.	P	-	-	-	-	-	-	-	-	-	-	-
7. DND performs an analysis of the geolocated footprint and all components on DND land and in controlled access area CYD501 of the water access Georgian Bay on DND and CYR501 DND controlled airspace. DND may require additional information from the Proponent, if needed	DND	DND	-	-	-	-	-	-	-	-	-	-



8. Proponent submits a comprehensive construction sequencing plan.	-	-	-	-	P	-	-	-	-	-	-	-
9. DND performs an analysis of the construction sequencing plan. DND may require additional information from the Proponent, if needed.	-	-	-	-	-	DND	DND	-	-	-	-	-
10. Proponent submits a comprehensive package that includes information on impacts and mitigation plans and monitoring for potential impacts to DND for air quality, noise, vibration, potential for EM interruptions and radio frequency, lighting and traffic, water quality impacts in relation to the potable water supply, surface water management, climate resilience, flood inundation mapping, marine access and dock plans, emergency response and security plans.	-	-	-	-	-	P	-	-	-	-	-	-
11. DND performs an analysis of the impacts and mitigation plans and monitoring on DND. DND may require additional information from the Proponent, if needed.	-	-	-	-	-	-	DND	DND	-	-	-	-
12. DND prepares package for Minister	-	-	-	-	-	-	-	-	DND	DND	DND	-
13. Minister of National Defence issues the determination if the project can be accommodated at ATC-C.	-	-	-	-	-	-	-	-	-	-	-	DND
14. DND Indigenous Consultations on Land use agreement/ Real Property instrument	-	-	-	IC	IC	IC	IC	IC	IC	IC	IC	IC
Legend: P = Proponent DND = Department of National Defence IC = Indigenous consultation-related activity												

Notes:



- One of the inputs for the Minister of National Defence Determination is the outcome of the Impact Assessment. Sequencing and coordination of decisions between DND and IAAC will be required.

Interim Water Licence Application under the Dominion Water Power Regulations (CIRNA)	Quarter and Year												
	Q1 2026	Q2 2026	Q3 2026	Q4 2026	Q1 2027	Q2 2027	Q3 2027	Q4 2027	Q1 2028	Q2 2028	Q3 2028	Q4 2028	Q1 2029
1. Proponent submits official Interim Water Power Licence Application.	P		-	-	-	-	-	-	-	-	-	-	
2. CIRNAC reviews the Interim Water Power Licence Application	CIRNAC	CIRNAC											
3. The proponent publishes a notice in the Canada Gazette and local media outlet.	P												
4. A 30-day public comment period is conducted by CIRNAC, concurrent with the Impact Assessment Agency of Canada’s comment period.	CIRNAC												
5. CIRNAC reviews comments received during the public comment period and prepares a recommendation package for the Minister of Indigenous Services Canada. The Minister will decide on whether a public hearing needs to be held.		CIRNAC	CIRNAC	-	-	-	-	-	-	-	-	-	
6. The Proponent submits FEL2 engineering plans to CIRNAC as the General Layout Plans required under section 6 of the DWPR.			P										
7. CIRNAC technical review of FEL2 engineering plans			CIRNAC	CIRNAC									
8. Proponent submits dam safety plans, emergency preparedness plans, monitoring/ maintenance plans, and construction sequencing plan.				P	P								



9. CIRNAC technical review of additional plans and supporting information submitted by the Proponent.					CIRNAC	CIRNAC								
10. Proponent submits FEL3 engineering plans to CIRNAC							P							
11. CIRNAC technical review of FEL3 engineering plans							CIRNAC	CIRNAC						
12. A) Administrative licence process: CIRNAC prepares a draft Interim Licence					CIRNAC	CIRNAC	CIRNAC	CIRNAC	CIRNAC	CIRNAC				
13. A) Administrative licence process: CIRNAC prepares a Ministerial decision package to support the Minister of Indigenous Services Canada's decision on the draft Interim Licence.											CIRNAC	CIRNAC	CIRNAC	
14. A) Administrative licence process: Minister of ISC approves the Interim Licence														CIRNAC
12. B) Regulatory licence process: CIRNAC-LPRAD, drafts project-specific regulatory clauses and initiates the regulatory process.					CIRNAC - LPRAD	CIRNAC - LPRAD	CIRNAC - LPRAD	CIRNAC - LPRAD	CIRNAC - LPRAD	CIRNAC - LPRAD	CIRNAC - LPRAD			
13. B) Regulatory licence process: CIRNAC-LPRAD, prepares a Governor in Council submission package and seeks Treasury Board approval for pre-publication of the proposed regulations.											CIRNAC - LPRAD	CIRNAC - LPRAD		
14. B) Regulatory licence process: CIRNAC publishes the proposed regulations in the Canada Gazette and conducts 30-day comment period.														CIRNAC - LPRAD
15. B) Regulatory licence process: CIRNAC issues Interim Licence pursuant to approved regulations														CIRNAC - LPRAD



16. Indigenous Consultation process for the application, if applicable					IC	IC	IC	IC	IC	IC	IC	IC	IC	IC
Legend: P = Proponent CIRNAC = Crown-Indigenous Relations and Northern Affairs Canada IC = Indigenous consultation-related activity LPRAD = Legislative, Parliamentary, and Regulatory Affairs Directorate														

Notes:

- There are two possible timelines for the granting of the Interim Licence outlined in the table above. The administrative licence process is outlined in steps 12A to 14A, and the regulatory licence process is outlined in steps 12B -15B. See Table 1 for more details.
- Although the administrative DWPA licence process could be finalized within 1.5 years a Ministerial decision cannot proceed before the Impact Assessment Ministerial Decision has been made.
- STEP 5: If the Minister of ISC decides a public hearing is necessary, CIRNAC will coordinate with IAAC to plan a date, time, and place for it to be held. The Proponent must attend to hear and speak to the issues addressed by the public. Following the public hearing, the Minister of ISC will make a public interest decision based on the feedback received for the application.
- STEPS 12A-14A and 12B-15B: Timelines could be longer due to the potential requirement of a land use agreement/Real Property instrument with the Crown.

Species At Risk Act Permit (ECCC)	Month														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
1. Proponent submits a comprehensive application (see Section 3 of the Guidelines)	P	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2. ECCC reviews the application, and issues information requests as needed (see section 4 and 5 of the Guidelines)	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	-	-	-
3. Proponent responds to information requests.	P	P	P	P	P	P	P	P	P	P	P	P	-	-	-
4. Consultations under SARA s.73(4) and (5) may occur	-	IC	IC	IC	IC	IC	IC	IC	IC	IC	IC	IC	-	-	-
5. Minister issues a permit or notifies proponent that permit has been refused	-	-	-	-	-	-	-	-	-	-	-	-	EC	EC	EC
Legend: P = Proponent EC = Environment and Climate Change Canada IC = Indigenous consultation-related activity															



Notes:

- **GENERAL:**
 - This timeline is precautionary, based on the anticipated timelines of the proponent and should be reviewed/revised in consultation with ECCC when the need for a SARA permit has been confirmed.
 - The 90-day service standard for issuing a SARA permit does not apply when a decision under IAA is required.
 - ECCC encourages proponents to submit clear and complete permit applications at least 6-8 months prior to the anticipated start of activities that require a SARA permit. Submitting an application as early as possible in the impact assessment process allows opportunities to identify potential issues and consider solutions.
 - Note that the proponent has indicated that they will be submitting an application earlier in the IA process than the typical 6-8 months.
 - A SARA permit cannot be issued until the IAA process has concluded.
- **STEPS 2 and 3:** ECCC will commence reviewing the application when submitted. Depending on response to questions, Steps 2 and 3 may not require the full allocated time.
- **STEP 4:** The length of time for IC, if required, is not expected to take a year, but may occur at some point during that time, once ECCC has sufficient information to consult.
- **STEP 5:** Allowing 3 months for Ministerial review and formation of opinion under SARA s.73

Fisheries Act Authorization Processes and Steps (DFO)	Month												
	0	1	2	3	4	5	6	7	8	9	10	11	12
1. Proponent shares draft of application with Indigenous communities and for DFO to evaluate comprehensiveness	P	-	-	-	-	-	-	-	-	-	-	-	-
2. Proponent submits a comprehensive application	-	P	-	-	-	-	-	-	-	-	-	-	-
3. 60-day legislated timeline starts. DFO reviews the application for completeness and adequacy, and identifies any supplemental information required	-	DFO	DFO	-	-	-	-	-	-	-	-	-	-
4. Proponent addresses comments and provides supplemental information required	-	-	-	P	P	-	-	P	P	-	-	-	-
5. DFO reviews supplemental information or documentation and determines whether the application is complete and adequate. Steps 3-5 repeated as needed	-	-	-	-	-	DFO	DFO	-	-	DFO	DFO	-	-
6. DFO Indigenous consultations: a) Early identification of issues b) Send consultation offer letters to Indigenous communities c) Processing of funding requests d) Review of funding applications and meetings at the request of Indigenous communities	-	IC	IC	IC	IC	IC	IC	IC	IC	IC	IC	IC	IC



7. Proponent supports DFO in responding to Indigenous comments, technical questions, and inquiries.	-	P	P	P	P	P	P	P	P	P	P	P	P
8. DFO conducts technical review of the application and issues information requests to Proponent as needed.	-	-	-	DFO	DFO	DFO	DFO	DFO	DFO	DFO	DFO	DFO	DFO
9. Proponent provides DFO with additional information or clarifications to support technical review or decision-making	-	-	-	P	P	P	P	P	P	P	P	P	P
10. 90-day legislated timeline begins. DFO completes Indigenous consultation summary report and informs the proponent and Indigenous communities of the decision.	-	-	-	-	-	-	-	-	-	-	DFO	DFO	DFO
11. DFO Internal briefings and approvals	-	-	-	-	-	-	-	-	-	-	-	-	DFO
Legend: P = Proponent DFO = Fisheries and Oceans Canada IC = Indigenous consultation-related activity													

Notes:

- This timeline assumes that no additional field work or baseline data collection is needed to support DFO's review of the application.
- A one-year timeframe is generally sufficient for reviewing a complete and adequate application (as per the Schedule 1 requirements of the Authorizations Concerning Fish and Fish Habitat Protection Regulations) and decision making. However, for a project with this scope and complexity the review may take more than a year to complete
 - Note that the proponent has indicated that they will be submitting an application earlier in the IA process (see Section 1)
- The above timeline is based on an estimate of two rounds of additional information.
- A FAA approval cannot be issued until the IAA process has concluded.
- The 90-day legislated timeline may be delayed or be ceased to accommodate Indigenous consultation as needed.
- The 60-day and 90-day legislated timelines may be shortened depending on completeness of application and required documents.

CNWA Approval under s.7(6) (TC)	Month												
	0	1	2	3	4	5	6	7	8	9	10	11	12
1. Proponent collects the information required and prepares a comprehensive application	P	-	-	-	-	-	-	-	-	-	-	-	-
2. Proponent submits an application that includes required information and submits application on TC's External Submission Site (ESS)	-	P	-	-	-	-	-	-	-	-	-	-	-



3. TC checks whether the application is complete and sends an acknowledgement of receipt	-	TC	-	-	-	-	-	-	-	-	-	-	-
4. TC confirms the works and the amount to be invoiced with the proponent's agreement, then sends the invoice to the proponent	-	-	TC	-	-	-	-	-	-	-	-	-	-
5. When the payment is confirmed, TC begins the analysis of the application	-	-	-	TC	TC	-	-	-	-	-	-	-	-
6. TC prepares and sends the instructions for posting 30-day public notice to the proponent. Proponent posts the public notice	-	-	-	-	-	TC	TC	-	-	-	-	-	-
7. The NPP officer incorporates public comments and consultations into their analysis, finalizes their assessment, and prepares approval document	-	-	-	-	-	-	-	TC	TC	TC	-	-	-
8. Indigenous consultation process for the application, if applicable	-	-	-	IC	IC	IC	IC	IC	IC	IC	-	-	-
9. TC holds the approval documents pending the conclusion of parallel processes and adjusts as needed	-	-	-	-	-	-	-	-	-	-	TC	TC	TC
Legend: P = Proponent TC = Transport Canada IC = Indigenous consultation-related activity													

Notes:

- This timeline is for a single application that covers all works.
- An approval typically can take up to 12 months after application submission.
 - Note that the proponent has indicated that they will be submitting an application earlier in the IA process (see Section 1) than the required 12 months
- A CNWA approval cannot be issued until the IAA process has concluded.
- The timing of steps 6 and 8 can be flexible and are dependent on when proponent has final drawing to be included in the posting. The duration of certain important steps described may vary depending on the proponent's response time and indigenous consultation.

Explosives Act (NRCan) Magazine licence (storage)	Month											
	1	2	3	4	5	6	7	8	9	10	11	12
1. Proponent submits a comprehensive application	P	-	-	-	-	-	-	-	-	-	-	-



2. NRCan's Explosives Regulatory Division performs an analysis of the application based on regulations requirement.	-	NR	-	-	-	-	-	-	-	-	-	-
3. If needed, Explosives Regulatory Division may conduct additional Indigenous consultations.	-	IC	-	-	-	-	-	-	-	-	-	-
4. Explosives Regulatory Division issues the licence	-	NR	-		-	-	-	-	-	-	-	-
Legend: P = Proponent NR = Natural Resources Canada IC = Indigenous consultation-related activity												



Annex B – Detailed DND Information Requirements

Impacts on human health, safety, emergency management, equipment, infrastructure, or operations that may impact DND land or interfere with Canadian Armed Forces (CAF) health and safety, operations or communications must be provided so DND can assess impacts to CAF operations and understand impacts to DND personnel. The following information must be provided by the proponent either through the Impact Statement or directly to DND (note that a formal request for review in writing must be submitted to DND in relation to each of the information requirements):

- The full project footprint at all stages (including the road to potential marine access). Note any changes in the project footprint scope including overland flow for the spillway and transmission infrastructure beyond what is provided in the AIP may change the scope of the DND IAA S. 82 EED or change CAF effects and cause delays with a Minister of National Defence determination. DND cannot reasonably assess the impacts on CAF without the proponent providing a more fulsome design. See [DNDs Federal Advice Authority Record](#) for comments on the project footprint provided in the IPD. The Project footprint also includes, but not limited to:
 - Marine Access and Dock plans including dock location, access road route, and shoreline infrastructure
 - Detailed information on the spillway design for the pumped storage reservoir, including the anticipated flow paths of discharged water, identification of all required associated infrastructure, and an assessment of potential environmental, hydraulic, and downstream impact considerations
 - Mapped location and detailed description of transmission infrastructure and alignment on DND land plans
 - Flood inundation mapping in accordance with applicable dam safety guidelines or other applicable guidelines for a range of design and extreme events, delineating flood and overflow extents, depths, velocities, and arrival times, and identifying potential impacts to downstream populations, infrastructure, and environmental receptors
- Develop an all-hazards emergency preparedness and response framework consistent with applicable dam safety and occupational health and safety guidelines, addressing credible emergency scenarios including health, fire, security, and external hazards, and defining roles and responsibilities, communication protocols, and coordination with relevant authorities.
- Security plan consistent with recognized dam safety guidelines and DND security requirements, including a systematic assessment of potential security threats (e.g., unauthorized access or trespass onto DND lands or training areas, vandalism, theft, sabotage, criminal activities, and cyber threats). The plan shall establish mitigation and response measures such as controlled access points, physical barriers, monitoring and surveillance systems, intrusion detection, and security personnel protocols. It shall also include specific provisions for construction site security management, including site access controls, contractor compliance, and material and equipment protection, as well as comprehensive incident management procedures covering detection, reporting, response, investigation, and coordination with DND and law enforcement agencies



- Develop and implement a Construction Sequencing Plan aligned with DND requirements that clearly defines the sequence, timing, and location of all construction activities, including Temporary Construction Elements (TCE). The plan shall identify potential constraints and conflicts with DND lands, training areas, and CAF operations, and shall include provisions for advance notification, access coordination, and scheduling to minimize disruption. The plan shall also outline a coordinated approach for the sequencing of relocation, protection, or modification of DND infrastructure, ensuring compatibility with ongoing CAF operational and training requirements
- Any air quality impacts, including air pollution mitigation and monitoring plans
- Any noise and vibration impacts, including mitigation and monitoring plans
- Any lighting and traffic impacts, including mitigation and monitoring plans
- Water quality impacts in relation to drinking water, including mitigation and monitoring plans
- Prepare an assessment of potential radio frequency (RF) and electromagnetic (EM) interference associated with all project components and activities, including construction and operations, that may affect Canadian Armed Forces (CAF) communications systems and infrastructure. The proponent shall identify sources of interference, evaluate potential impacts, and establish mitigation measures, monitoring protocols, and coordination procedures with DND to ensure the continued reliability and integrity of CAF communications
- Surface water management (including precipitation and snow melt) and any changes to water runoff caused by the project and mitigation.
- Any climate resilience issues and mitigation strategies.

NOTE: The Q1 2026 submission of information on the Project Footprint of all components on DND land is insufficient. Key information remains outstanding, including CAD and GIS files, geolocated spillway location and associated infrastructure, transmission line routing and corridor requirements, access points and access routes, and other project components that may affect DND lands and operations. Where a proposed footprint differs from or extends beyond the footprint established in the approved AIP, DND treats it as a new land-use request requiring further assessment and, potentially, amendments to existing agreements or additional approvals, and timelines. The absence of this information may result in delays to DND's review process and could affect overall project timelines. DND will continue to work collaboratively with TC Energy as project design progresses and additional information becomes available.



Annex C – Detailed *Species at Risk Act* Permit Information Requirements

Species at risk and their habitat

The proponent must address requirements for each species at risk listed as extirpated, endangered or threatened on Schedule 1 of SARA, if the species or its habitat are likely to be in the project area or study areas. Specifically, the proponent must consider the potential impacts to each of the following species at risk, which are confirmed or have the potential to be present, and any other listed species that are found prior to submission of the SARA permit application:

- Butternut (endangered);
- Western Chorus Frog, Great Lakes/St. Lawrence – Canadian Shield population (threatened);
- Little Brown Myotis, Northern Myotis, and Tri-coloured Bat (endangered);
- Red-headed Woodpecker (endangered);
- Monarch (endangered);
- A plant species at risk (endangered)

To note: should a species in the project area or study areas become listed during project operations/decommission, a SARA permit application may also be required.

The information below is required to support the assessment of a permit application for the Ontario Pumped Storage Hydropower Project. This specific guidance is in addition to generic guidance which can be found at: <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/permits-agreements-exceptions.html>

- Baseline information
- Effects to species at risk and their habitat
- Assessment of alternatives
- Mitigation measures
- Jeopardy

Baseline information



With respect to Butternut, the proponent must consider to the extent applicable:

- identify all Butternut found within the project area and include:
 - the location of all Butternut individuals (saplings, seedlings, mature and dead/dying trees) using latitude / longitude – decimal degrees;
 - a Butternut health assessment for each Butternut, following Ontario provincial standards, including photos of the tree during the leaf on period; and
 - a habitat characterization of the areas supporting Butternut within the project area.
- with respect to the broader area assess the contribution of Butternut at the project site to local and regional Butternut populations (e.g., population numbers, existence of hybridity, existence of putatively canker resistant trees) including an assessment of the extent of natural reproduction relative to the local study area (LSA) and regional study area (RSA).

With respect to Western Chorus Frog and its habitat, the proponent must consider to the extent applicable:

- provide details of survey methodology, referencing established protocols where appropriate, including:
 - a description of the autonomous recording unit (ARU) recording schedule.
- include mapping at an appropriate scale that shows, within the PA:
 - the locations of formal surveys/point counts, deployed ARUs, and surveyor tracks (where available, to evaluate overall observer coverage);
 - all known Western chorus frog breeding features (e.g., vernal pools, wetlands, ruts) and associated overwintering areas and dispersal habitats, consistent with habitat descriptions found in the species' residence description and recovery strategy under SARA;
 - all Western Chorus Frog breeding observations, including breeding call codes and whether observations were made using ECCC recommended breeding survey methods (Draft Western Chorus Frog Detection Survey Protocol for Ontario – Blazing Star), opportunistic observations or with ARUs; map should note whether mapped points represent observer location or estimated breeding observation location (based on breeding calls); and,
 - Western Chorus Frog observation and habitat information in relation to the project area, existing roads, DND infrastructure, proposed relocation of DND infrastructure, and any other features of potential relevance to connectivity and use of Western chorus frog habitat.
- include a table(s) of Western Chorus Frog survey/incidental observation data that includes the following information:
 - survey protocol/methodology for each observation (e.g. Draft Western Chorus Frog Detection Survey Protocol for Ontario – Blazing Star, point counts, incidental observations, ARUs);
 - for formal surveys/point counts, table should identify whether Western Chorus Frogs were detected or not;
 - breeding call code of any Western chorus frog detections, and the direction/distance of any detections, where known;
 - location of survey station/observer location (decimal degrees or UTM's);
 - location of breeding observation/breeding feature (where known or estimated);
 - date, time, weather (temperature, wind, cloud cover), and noise information at the time of the survey;



- any information that may relate to the survey results (other species detected, ice cover, frog activity at reference sites, etc.); and
 - any additional information prescribed/collected as part of the survey.
- Summarize the number of breeding features, surface area, depths (approximate or measured), vegetation present and any other habitat related observations relevant to breeding success (e.g., presence of buckthorn).

With respect to Little Brown Myotis, Northern Myotis, and Tri-coloured Bat, the proponent must consider to the extent applicable:

- describe species with the potential to be present based on a desktop analysis and include any results of surveys undertaken to confirm individual species occurrences using the project area;
- describe the source of the species at risk data, including survey design, sampling protocols, and data handling;
- provide information on species presence, species richness, and activity level as well as mapping at an appropriate scale that shows the following, within the project area:
 - any hibernacula and maternity roosting habitat consistent with habitat descriptions found in the species' recovery strategy under SARA and as outlined in [Bat and Bat Habitats: Guidelines for Wind Power Projects, 2011](#); and
 - habitat information in relation to the PA, existing roads, DND infrastructure, proposed relocation of DND infrastructure, and any other features of potential relevance to use of Little Brown Myotis, Northern Myotis, and Tri-coloured Bat overwintering or maternity roosting habitat.
- describe results of surveys undertaken as outlined in [Bat and Bat Habitats: Guidelines for Wind Power Projects, 2011](#);
- describe results of surveys undertaken using ARUs.
 - when using recognized standards, provide details of any modifications to the recommended methods and rationale for these modifications; and
 - indicate who was consulted in the development of the baseline surveys (e.g., federal/provincial wildlife experts, specialists, and local Indigenous communities).
- describe the general life history (e.g., overwintering, pup rearing, swarming, foraging) that may occur in the project area, or be affected by the project; and
- identify critical periods (e.g., overwintering, maternity roosting/ pup rearing, swarming), biologically appropriate setback distances, or other restrictions related to these species.

With respect to a plant species at risk, the proponent must consider to the extent applicable:

- Identify all individuals found within the Project Area and include:
 - Location (latitude/longitude – decimal degrees);
 - Health condition of plants; and
 - Evaluation of the extent of natural reproduction and any factors that are favouring or inhibiting natural reproduction.

With respect to Red-headed Woodpecker, the proponent must consider to the extent applicable:



- Map any observations of Red-headed Woodpecker within the Project Area and include location (latitude/longitude – decimal degrees).
- Map any observations of nesting or roosting cavity trees used by Red-headed Woodpecker in the Project Area.
- Identify any observations of breeding activity by Red-headed Woodpecker within the Project Area.

With respect to Monarch, the proponent must consider to the extent applicable:

- Conduct surveys throughout the Project Area based on established methodology (e.g., Mission Monarch);
- Map any observations of Monarch within the Project Area and include location (latitude/longitude – decimal degrees); and
- Map the location of any milkweed within the Project Area.

Effects to species at risk and their habitat

With respect to Butternut, the proponent must consider to the extent applicable:

- identify whether each Butternut within the proposed project area would need to be removed, or whether any works would take place within the dripline of the tree, or a distance of 12cm per cm of dbh, or 2 metres, whichever is greater;
- identify any changes to tree cover and competition from other species that may affect Butternut, either positively or negatively;
- identify the impacts of removal of Butternut at the project site on natural regeneration within the LSA and RSA; and
- describe effects related to potential introduction of invasive species, or due to the increase in the spread and prevalence of diseases or pests.

With respect to Western Chorus Frog, the Proponent must consider to the extent applicable:

- identify and map the area and location of each habitat type (i.e., breeding, dispersal and overwintering) that will be lost or impacted, either directly or indirectly, as a result of building and operating the Pumped Storage Project. This should be done, and mapped, in relation to the existing habitat within the project area;
- Quantify the amount of each habitat type lost or impacted, either directly or indirectly, as a result of building and operating the Pumped Storage Project.
- determine whether the Project is expected to result in a reduction of connectivity, and identify any anticipated effects on the local population due to changes in connectivity with a rationale for the conclusion;
- include an assessment of cumulative effects that includes consideration of past, current and future land uses including the relocation of DND infrastructure that would be necessitated by creation of the Pumped Storage Project reservoir and associated infrastructure; and
- describe effects related to potential introduction of invasive species, or due to the increase in the spread and prevalence of diseases or pests.

With respect to Little Brown Myotis, Northern Myotis, Tri-coloured Bat the Proponent must consider to the extent applicable:



- provide an assessment of potential adverse effects on bat individuals and roosting habitat in the project area; and
- describe the potential effects (e.g., direct removal related to construction or vibration through deep blasting) to hibernacula in the project area (for Little Brown Myotis, Northern Myotis, and Tri-coloured Bat).

SARA s.73(3)(a) – Alternatives

The proponent must:

- provide a description of the alternatives to the activity (construction of the project) that are technically and economically feasible to achieve the project purpose;
- prioritize reasonable alternatives that optimize the avoidance of impacts to species at risk (SAR), taking into consideration the requirements of the Species at Risk Act (SARA) s73(3); and
- present the rationale for selecting the proposed project over other options, taking all of the above into consideration.

In order to be consistent with section 73(3)(a) of SARA, which states “*all reasonable alternatives to the activity that would reduce the impact on the species have been considered and the best solution has been adopted*”, the assessment of project alternatives should meaningfully take into account the reduction of negative impacts to SAR and aim to minimize them.

The proposed project may have potentially significant impacts to SAR, in particular Butternut, and it is important that the consideration of alternatives to the project be undertaken in a manner that gives appropriate weight to species at risk considerations. If the project is authorized and requires a SARA permit, appropriate consideration of SAR issues in the consideration of project alternatives during the IA process will allow the s.73(3)(a) element of the SARA permitting process to focus on alternative means for implementing the project at the approved site. To inform a robust assessment of precondition 73(3)(a) and to ensure that the best alternative has been selected for species at risk, ECCC will require a detailed analysis of alternatives to the activity (construction of the Project) that addresses:

- 1) *Alternatives to construction of the Project, i.e. in terms of other locations and other forms of construction. These alternatives should be considered in isolation and cumulatively (i.e., a combination of techniques).*
- 2) *Of the reasonable alternatives, the best option from a species at risk perspective.*

Under SARA, “reasonable alternatives” are those that are **biologically, ecologically, technically, or socio economically feasible**. The Minister will assess whether the option retained provides the **best conservation outcome** for the affected species at risk.

To meet this requirement, proponents should begin early to:

- describe alternative activities, designs, equipment, or processes considered and the rationale for selection;



- identify alternative locations outside the species' range or critical habitat and explain why they were rejected;
- identify alternative timelines to avoid sensitive periods and explain why they were rejected;
- describe alternatives for each project activity, where applicable; and
- explain why the current proposal represents the best solution.

SARA s.73(3)(b) - Mitigation measures

The Proponent must demonstrate the use of the mitigation hierarchy to select appropriate mitigation measures and describe the measures for mitigating potential effects on species at risk individuals, their residences and their critical habitat, including:

- describe the proposed mitigation measures for potential adverse effects on species at risk individuals, their residences, and their critical habitat, include the justification, based on scientific data, for the proposed measures;
- provide an account of how the Project and mitigation measures are consistent with the recovery strategy / action plan for the species. Mitigation measures must be compatible with any applicable recovery strategy and action plan and be described in terms of the effectiveness of each measure in avoiding negative effects;
- describe mitigation measures to reduce the risk of harmful, destructive, or disruptive activities in sensitive times and places of importance to species at risk;
- describe measures to prevent the release of harmful substances into waters or areas frequented or occupied by species at risk; and
- provide mitigation measures for effects on habitat, aligned with the hierarchy of mitigation measures and justify moving from one mitigation option to another.

With respect to Butternut, the Proponent must:

- describe all reasonable alternative means of carrying out the Project that would avoid the adverse effects of the Project on Butternut;
- describe how these alternative means have been considered, and provide a rationale to confirm that the best solution has been adopted to mitigate adverse effects on Butternut;
- describe all feasible measures that will be taken to minimize the adverse effects of the project on Butternut and its habitat, such as:
 - minimize the footprint of the development and consider alternate locations and/or configurations where the habitat is already disturbed;
 - design and implement offsets for effects to Butternut and habitat, as determined appropriate through technical discussions with ECCC, to be hosted by the Proponent;
 - that consider: the [Operational Framework for Use of Conservation Allowances](#) (Minister of the Environment, 2012); and
 - identify how avoidance and mitigation measures are consistent with the federal recovery strategy and how they meet the population and distribution objectives for the species.



With respect to Western Chorus Frog, the Proponent must:

- identify what alternative means of carrying out the project were considered that would minimize impacts to Western Chorus Frog;
- describe all feasible measures that will be taken to minimize the adverse effects of the project on Western Chorus Frog and its habitat;
- for areas of breeding, dispersal and overwintering habitat, provide an account of how the proposed avoidance and mitigation measures will minimize impacts to Western Chorus Frog and its habitat;
- identify proposed offset plans for any impacts that cannot be avoided or mitigated including the creation of replacement habitat, consistent with the Government of Canada's Operational Framework for Use of Conservation Allowances; and
- identify how avoidance and mitigation measures are consistent with the federal recovery strategy and residence description for the species.

With respect to Little Brown Myotis, Northern Myotis and Tri-coloured Bat the Proponent must:

- describe all feasible measures that will be taken to minimize the adverse effects of the project on SAR bats and their habitat;
- describe the effectiveness of the mitigation measures; and
- identify how avoidance and mitigation measures are consistent with the federal recovery strategy and residence description for the species.

With respect to Red-headed Woodpecker, the Proponent must:

- describe all feasible measures that will be taken to minimize the adverse effects of the project on Red-headed Woodpecker and its habitat;
- identify how avoidance and mitigation measures are consistent with the federal recovery strategy and residence description for the species; and
- identify offsetting plans for any impacts to red-headed woodpecker individuals, or trees used by Red-headed Woodpeckers for nesting or roosting (i.e., residences under SARA that are afforded year-round protection), or changes to landcover that may negatively impact nesting or foraging by red-headed woodpeckers.

SARA s. 73(3)(c) – Jeopardy

The proponent must describe, after considering the alternatives and mitigation measures as described above, how the proposed project will not result in jeopardy to any of the species affected by the project.