



Peer Review Report

Local/Regional Education Study Report (S14)

Municipality of South Bruce

August 9, 2022

Executive Summary

The Nuclear Waste Management Organization (NWMO) has been engaged in a multiyear, community driven process to identify a site where Canada's used nuclear fuel can be safely contained. The site selection process involves nine steps, with the process currently at Step 3 (Phase 2). The NWMO is now in its final screening process, and the two remaining siting areas currently being assessed under Step 3, Phase 2, are the Municipality of South Bruce (MSB) and the Township of Ignace, and their surrounding areas. The NWMO plans to complete all preliminary assessment work and to select one community/area to host the Adaptive Phased Management (APM) Project (Project) by 2023.

Building on previous work, engagement completed to-date, and MSB's 36 Guiding Principles, NWMO and MSB are working together to prepare a suite of studies which will be shared broadly with the community. The studies are being undertaken by NWMO or MSB, with some being joint efforts. The MSB has retained consultants (Deloitte LLP [Deloitte], Tract Consulting) to develop a number of studies and to peer review others (GHD Limited [GHD] team) developed by NWMO and their consultants (DPRA Canada Inc. [DPRA] team). The information acquired through the studies is expected to aid MSB make informed decisions about whether the Project is suitable for their community, and if they are willing to consider hosting it and under what circumstances and terms.

The Local/Regional Education Study (S14) is one of the studies being carried out by NWMO with the overall objective to assess the effects of the NWMO Project on the local and regional education services (elementary through high school). The Local/Regional Education Study was peer reviewed by Subject Matter Experts (SME) at Deloitte (Trudy Parsons and Shaun Goodeve) in combination with the GHD Leadership Team (Greg Ferraro and Ian Dobrindt), making up the Peer Review Team (PRT). This peer review has been undertaken on the framing and scope of the study, and the effects assessment, in accordance with the Peer Review Protocol process established jointly by MSB and NWMO. The PRT considered several documents and information in the peer review of the Local/Regional Education Study Draft Report to aid in their understanding, focus the peer review, and develop their findings. The PRT findings and resolution of those findings are outlined in this Peer Review Report.

The PRT provided comments on draft versions of the Study, and these were subsequently discussed in greater depth in meeting with the Study authors. The outcomes of these meetings provided greater clarity and helped to focus the objectives of the Study. The Study sufficiently incorporated the insights gathered through six knowledge holder interviews and consultations and brought forward relevant data analysis provided by the respective School Boards and secondary demographic information. In addition, where appropriate, the Study incorporated the findings from other municipally led studies and reports that helped to better inform the potential impacts of the Project on future school enrolments. The Study clearly demonstrated how the relevant MSB's Guiding Principles (specifically principles #10, #15 and #32) could be addressed should the Project proceed,

It is the view of the PRT that the Local/Regional Education Study Report satisfies the objective of characterizing the current state of school enrolment, projecting future school enrolments (with and without the Project) and describing approaches to addressing future school infrastructure to accommodate growth in the student population.

Should the MSB be selected as the potential site of the Project, the respective School Boards will need to evaluate how best to accommodate increases in student enrolment due to the expected increase in population within the Study Area. The Study noted that without the Project, the Study Area is experiencing a population increase presently that has resulted in some schools having a 100% utilization rate.

It will be the responsibility of the School Boards to ensure that there is capacity to provide classroom space to meet these growth projections. However, the Study has identified options for the NWMO to assist the School Boards to maintain or enhance education infrastructure.

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Acronyms

APM	Adaptive Phased Management
CNSC	Canadian Nuclear Safety Commission
CSR	Corporate Social Responsibility
CWB	Community well-being
DPRA	DPRA Canada Inc.
GHD	GHD Limited
MSB	Municipality of South Bruce
NWMO	Nuclear Waste Management Organization
PRT	Peer Review Team
SME	Subject Matter Expert

Scope and limitations

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Respectfully submitted by:



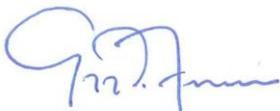
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1. Introduction

This report documents the peer review undertaken of the Local/Regional Education Study (S14) Draft Report prepared by DPRA Canada Inc. (DPRA) dated March 28, 2022 (Draft), June 3, 2022 (Revised Draft), and July 15, 2022 (Final Draft). The Nuclear Waste Management Organization (NWMO) has been engaged in a multiyear, community driven process to identify a site where Canada's used nuclear fuel can be safely contained. The site selection process involves nine steps, with the process currently at Step 3 (Phase 2). Step 3 is defined by two phases of preliminary assessments for each interested community. Phase 1 involved primarily desktop studies documenting the current socioeconomic conditions in the communities and then considering what might be the possible implications of the Adaptive Phased Management (APM) Project on community wellbeing (CWB) for each community and the wider area. For interested communities that successfully completed the initial screening in Phase 1, Phase 2 (the current phase) involves additional work to support conducting a preliminary assessment of potential suitability and narrowing the number of communities that have expressed an interest in partnering with NWMO.

The NWMO is now in its final screening process, and the two remaining siting areas currently being assessed under Step 3, Phase 2, are the Municipality of South Bruce (MSB) and the Township of Ignace, and their surrounding areas. The NWMO plans to complete all preliminary assessment work and to select one community/area to host the APM Project by 2023, which then marks the beginning of the fourth step of APM implementation¹. The selection of a final site will trigger the regulatory approvals phase of the APM Project. Federal approval under the Impact Assessment Act and licensing by the Canadian Nuclear Safety Commission (CNSC) under the Nuclear Safety and Control Act will be required. Meeting federal regulatory standards is imperative to achieve approval, and to withstand intense public and regulatory scrutiny.

Building on previous work, engagement completed to-date, and MSB's 36 Guiding Principles, NWMO and MSB are working together to prepare a suite of studies which will be shared broadly with the community. The list of studies is included in **Appendix A** grouped by similar topic area (MSB led, environment, infrastructure, and socio-economic). The studies are being undertaken by NWMO or MSB, with some being joint efforts. The MSB has retained consultants (Deloitte LLP [Deloitte], Tract Consulting) to develop a number of studies and to peer review others (GHD Limited [GHD] team) developed by NWMO and their consultants (DPRA). The information acquired through the studies is expected to aid MSB make informed decisions about whether the APM Project is suitable for their community, and if they are willing to consider hosting it and under what circumstances and terms.

The Local/Regional Education Study is one of the socio-economic studies being carried out by NWMO with the overall objective to assess the effects of the NWMO APM Project on the local and regional education services (elementary through high school). Specifically, the Local/Regional Education Study describes the likely increase in enrolment in local schools (K-12) and potential options to maintain or enhance the educational infrastructure in South Bruce and the neighbouring communities such that it is available in advance of the likely increase in enrolment. It is noted that the separate Workforce Development Study (Keir Corp., 2022) looks at the post-secondary setting, and amongst other things, describes how NWMO and regional agencies can develop the workforce necessary to undertake the Project.

The Local/Regional Education Study was peer reviewed by Subject Matter Experts (SME) at Deloitte (Trudy Parsons and Shaun Goodeve) in combination with the GHD Leadership Team (Greg Ferraro and Ian Dobrindt), making up the Peer Review Team (PRT). The peer review has been undertaken on the framing and scope of the study, and the effects assessment, in accordance with the Peer Review Protocol process established jointly by MSB and NWMO.

Section 2 elaborates on the Peer Review Protocol process followed including the steps specifically followed and discussions held with NWMO and the DPRA team.

As described in **Section 3**, the PRT considered several documents and information in the peer review of the Local/Regional Education Study to aid in their understanding, focus the peer review, and develop their findings.

1. Nuclear Waste Management Organization, 2020. Moving Towards Partnership - Triennial Report 2017 to 2019.

The results and resolution of the PRT findings are outlined in **Section 4** starting with how the Final Draft Report has been revised to address the comments on the Draft Report. This is followed by a review of how the Study complies with the approved Work Plan and how the Study informs the applicable Guiding Principles. Lastly, the conclusions from the peer review are provided.

The Local/Regional Education Study concludes that the capacity to absorb additional students varies among elementary and secondary schools within the catchment area. Schools vary in terms of their utilization rates, with some approaching or exceeding their on-the-ground capacity, while others maintain surplus capacity. Considering the projected baseline demands resulting from the Project, challenges are expected for some individual schools to accommodate students, despite school boards having surplus capacity in aggregate. Communities that may see an influx of population due to a higher potential housing surplus and greater projected average persons per housing unit may also see increased capacity pressures placed on local schools.

The Study notes that school boards within the Study Area have a duty to accommodate all students within their catchment area. The Study further states that population growth within the Study Area continues to increase however school boards cannot proactively request funds from the Ministry of Education to initiate capital projects to address project growth in student populations. Overall, the Study concludes that sufficient classroom space is not seen as a major challenge. Given full consideration of the Report's findings, the PRT concludes that the Local/Regional Education Study sufficiently describes the potential increase in enrolment in local schools and offers options to maintain or enhance the educational infrastructure in South Bruce.

2. Peer Review Protocol

2.1 Objectives and Overview of the Peer Review Protocol Process

As mentioned, the peer review of the Local/Regional Education Study was undertaken in accordance with the Peer Review Protocol established jointly by the MSB and the NWMO. The Peer Review Protocol had the following established objectives:

1. To provide the community of the MSB with an independent review by qualified SMEs
2. To complete a peer review of NWMO's assessment of potential impacts and proposed benefits of locating the APM Project in MSB in comparison to existing conditions
3. To review how the potential impacts and proposed benefits adhere to the 36 principles that will guide the MSB's assessment of willingness to host the APM Project

With these objectives in mind, the Peer Review was conducted in a collaborative manner between the NWMO/DPRA team and the MSB/GHD team while maintaining independence during the process. **Appendix B** includes the Peer Review Protocol established in June 2021 and **Figure 2.1** summarizes the process followed.

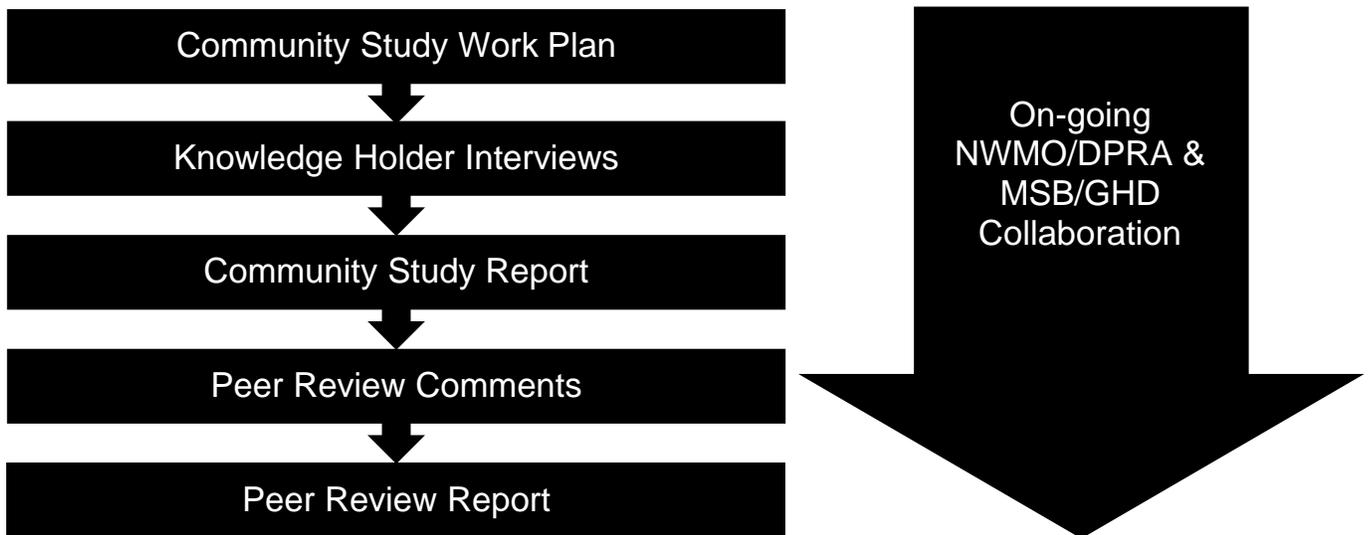


Figure 2.1 The Peer Review Protocol Process

With **Figure 2.1** in mind, the following identifies the primary activities carried out by the PRT:

Community Study Work Plan

- Review the Statement of Work associated with the Community Study (CS) prepared by MSB (May 2021) to better understand the stated objectives
- Gain a greater understanding of the APM Project and area conditions including reviewing and providing comments on NWMO's Project design reports and considering responses received from NWMO
- Hold on-going discussions as required with the NWMO/DPRA team providing input where appropriate (e.g., data sources to be reviewed, study area boundaries, knowledge holders to be interviewed, etc.)
- Review and provide comments on the draft Work Plan associated with the CS prepared by the NWMO/DPRA team and consider responses received from the NWMO/DPRA team as part of them finalizing the Work Plan before its implementation

Knowledge Holder Interviews

- Attend Knowledge Holder interviews organized by NWMO to listen firsthand, ask questions, and seek clarifications. Review and provide comments on draft meeting minutes prepared by NWMO.
- Hold on-going discussions as required with the GHD Leadership Team (e.g., receive Project updates and information, ask questions, seek clarification, etc.)

Community Study Report

- Attend CS Draft Report Status Update Meetings organized by the NWMO/DPRA team
- Review the CS Draft Report prepared by the NWMO/DPRA team
- Review the CS Revised Draft Report prepared by the NWMO/DPRA team
- Review the CS Final Draft Report prepared by the NWMO/DPRA team

Peer Review Comments

- Develop a preliminary list of comments including initial impressions, observations, and any potential issues and/or concerns with the CS Draft Report based on several documents and information as described in **Section 3**
- Attend a CS Draft Report Check-in Meeting with the GHD Leadership Team and MSB to discuss the preliminary list of comments and confirm those to be provided to the NWMO/DPRA team

- Provide the preliminary list of comments on the CS Draft Report to the NWMO/DPRA team for their understanding of the PRT's initial impressions, observations, and any potential issues and/or concerns
- Attend a CS Draft Report Working Session with the NWMO/DPRA team to discuss the preliminary list of comments and work through them collectively in a collaborative manner. Through the Working Session some comments were determined not to be applicable to the CS based on the clarifying discussions. In addition, through the Working Session it was agreed that those comments associated with the Draft Report's structure, or to such items like how sources or exhibits are referenced, or spelling and grammar, would be excluded and the focus would be more on content and substance as it related to the final Work Plan.
- In some situations, it was agreed to between the GHD Leadership Team/MSB and the NWMO/DPRA team that certain sections of the CS Draft Report or the entire document itself should be revised and resubmitted for review because of the nature and extent of the preliminary comments provided. In the situations of the entire document, the formal set of comments were held pending receipt of the revised CS Draft Report. Upon receipt, the revised CS Draft Report was reviewed, the preliminary comments updated accordingly for submission, and further discussions were held between the GHD Leadership Team/MSB and the NWMO/DPRA team prior to formal comments being submitted.
- Submit the formal set of comments on the CS Draft or revised Draft Report to the NWMO/DPRA team for their review and responses
- Review the responses from the NWMO/DPRA team to the formal set of comments and ensure there were no significant outstanding issues and/or concerns

Peer Review Report

- Prepare the draft Peer Review Report and submit to MSB for review
- Finalize the draft Peer Review Report based on any comments received and provide to MSB

2.2 Key Activities Associated with the Peer Review of the Local/Regional Education Study

With the preceding process in mind, **Table 2.1** lists the key activities associated with the Peer Review carried out by the PRT comprising the SMEs at Deloitte (Trudy Parsons and Shaun Goodeve) in combination with the GHD Leadership Team (Greg Ferraro and Ian Dobrindt) for the Local/Regional Education Study prepared by DPRA. The Local/Regional Education Study was initiated by DPRA following finalization of the Work Plan in October 2021 and culminated in the Final Draft Report being submitted to GHD on July 15, 2022.

Table 2.1 *Key Activities Associated with the Peer Review of the Local/Regional Education Study*

Key Activities	Date	Parties Involved
Review of the Draft Southwestern Ontario Local/Regional Education Study Work Plan (S14) issued by DPRA (August 10, 2021)	August 2021 – October 2021	Deloitte (Trudy Parsons, Paul Blais, Evelyn Paul, and Shaun Goodeve), GHD (Greg Ferraro and Ian Dobrindt)
Issuance of the Peer Review Team comment disposition table on the Draft Work Plan	September 14, 2021	Deloitte (Trudy Parsons and Shaun Goodeve), GHD (Greg Ferraro and Ian Dobrindt)
Review of the Final Southwestern Ontario Local/Regional Education Study Work Plan (S14) issued by DPRA (October 7, 2021)	October 2021 – January 2022	Deloitte (Trudy Parsons, Paul Blais, Evelyn Paul, and Shaun Goodeve), GHD (Greg Ferraro and Ian Dobrindt)
Review of Local/Regional Education Study Report (S14) Draft – Southwestern Ontario Community Study issued by DPRA (March 28, 2022)	March 2022 – June 2022	Deloitte (Trudy Parsons and Shaun Goodeve), GHD (Greg Ferraro and Ian Dobrindt)

Key Activities	Date	Parties Involved
Peer Review Team Check-in Meeting to review/confirm preliminary comments	April 11, 2022	Deloitte (Trudy Parsons and Schaun Goodeve), GHD (Greg Ferraro and Ian Dobrindt), and MSB (Catherine Simpson)
Issuance of the Peer Review Team preliminary comment disposition table on the Draft Report	April 20, 2022	Deloitte (Trudy Parsons and Schaun Goodeve), GHD (Greg Ferraro and Ian Dobrindt)
Peer Review Team and DPRA Project Update Meeting to discuss/understand the preliminary comments	April 28, 2022	Deloitte (Trudy Parsons and Schaun Goodeve), GHD (Greg Ferraro and Ian Dobrindt), MSB (David Rushton and Catherine Simpson), NWMO (Charlene Easton), DPRA (Vicki McCulloch)
Review of Local/Regional Education Study Report (S14) Revised Draft – Southwestern Ontario Community Study issued by DPRA (June 3, 2022)	June 2022 – July 2022	Deloitte (Trudy Parsons and Schaun Goodeve), GHD (Greg Ferraro and Ian Dobrindt)
Peer Review Team and DPRA Project Update Meeting	June 21, 2022	Deloitte (Trudy Parsons and Schaun Goodeve), GHD (Ian Dobrindt and Greg Ferraro)
Issuance of the Peer Review Team formal comment disposition table on the Draft and Revised Draft Reports	June 23, 2022	Deloitte (Trudy Parsons and Schaun Goodeve), GHD (Greg Ferraro and Ian Dobrindt)
Issuance of DPRA Team responses to Peer Review Team's formal comments on the Draft and Revised Draft Reports	July 11, 2022	DPRA (Vicki McCulloch)
Review of the Local/Regional Education Study Report Final Draft – Southwestern Ontario Community Study issued by DPRA (July 15, 2022)	July 15 – 20, 2022	Deloitte (Trudy Parsons and Schaun Goodeve) and GHD (Greg Ferraro and Ian Dobrindt)

3. Key Documentation and Information Reviewed

As stated, several documents and information were considered by the PRT in carrying out the Peer Review Protocol. **Table 3.1** lists the key documents and information considered by the PRT in the review of the Local/Regional Education Study.

Table 3.1 Key Documents and Information Considered in the Peer Review of the Local/Regional Education Study

Document Name/Information	Author/Source/Date	Description/Application
Implementing Adaptive Phased Management 2021 to 2025	Nuclear Waste Management Organization (NWMO) (March 2021)	Reviewed to understand the Project planning timelines. The PRT provided comments (November 18, 2021) for NWMO's consideration and response (January 27, 2022).
Local/Regional Education Study - Statement of Work	Municipality of South Bruce (MSB) (May 2021)	Reviewed to understand the objectives and scope of work including inputs to the Local/Regional Education Study and its relationship to other Community Studies as envisioned by the MSB.

Document Name/Information	Author/Source/Date	Description/Application
Knowledge Holder Interviews (Ontario Youth Apprenticeship Program; Avon Maitland District School Board; Bruce-Grey Catholic District School Board; Four County Labour Market Planning Board)	NWMO (October 2021 - February 2022)	Attended in-person to listen firsthand, ask questions, and seek clarifications as part of gaining an understanding of key knowledge holders' perspectives on the Project. Reviewed and provided comments on draft meeting minutes prepared by NWMO prior to their issuance to meeting attendees.
Deep Geological Repository Conceptual Design Report – Crystalline / Sedimentary Rock (APM-REP-00440-0211-R000)	NWMO (September 2021)	All members of the PRT reviewed the Executive Summary to obtain an understanding of the below ground facility. Subsequently, additional sections of the Report were reviewed, by certain members of the PRT as appropriate, to obtain a greater level of understanding specific to their areas of study (e.g., Facility Design and Operation, Aggregate Resources Study, Local Traffic Effects Study, Waste Management, etc.). The PRT provided comments (November 18, 2021) for NWMO's consideration and response (January 27, 2022).
APM 2021 DGR Lifecycle Cost Estimate Update Summary Report (NWMO-TR-2021-11 R001)	NWMO (September 2021)	Reviewed to better understand the scope and magnitude of the Project components. The PRT provided comments (November 18, 2021) for NWMO's consideration and response (January 27, 2022).
Community Studies Planning Assumptions	NWMO (October 18, 2021)	Reviewed to understand certain parameters for the Project. The PRT provided comments (November 18, 2021) for NWMO's consideration and response (January 27, 2022).
Southwestern Ontario Local/Regional Education Study Work Plan (S14)	DPRA Canada Inc. (October 7, 2021)	Reviewed to understand the purpose and outcome of the Local/Regional Education Study including its linkages to other Community Studies, scope and assumptions, approach, and key information sources/data collection.
Local/Regional Education Study Report (S14) Draft – Southwestern Ontario Community Study	DPRA Canada Inc. (March 28, 2022)	The draft output/deliverable from completing the final Work Plan for review by the PRT.
South Bruce and Area Growth Expectations Memo	metroeconomics (February 7, 2022)	Reviewed to understand the assessment of the potential for economic and demographic growth over the period from 2022 to 2046 of the Core Study Area including MSB both from the perspectives of growth independent of the Project as well as the result of the Project.
Local/Regional Education Study Report (S14) Revised Draft – Southwestern Ontario Community Study	DPRA Canada Inc. (June 3, 2022)	The revised draft output/deliverable from completing the final Work Plan for review by the PRT.
Local/Regional Education Study Report (S14) Final Draft – Southwestern Ontario Community Study	DPRA Canada Inc. (July 15, 2022)	The final output/deliverable from completing the final Work Plan for review by the PRT.

4. Peer Review Findings and Resolution

4.1 Comments on the Local/Regional Education Study

The PRT provided formal comments to NWMO/DPRA team on June 23, 2022 in the form of a memo and comment disposition table (**Appendix C**). As per on-going discussions between the PRT and the NWMO/DPRA team, the focus of the peer review and resolution of comments was to be on those of a more substantive nature. As a result, while Appendix C lists all the formal comments on the Local/Regional Education Study, **Table 4.1 (3rd column)** lists only those comments of a more substantive nature in the Comment Disposition Table.

In reply, NWMO/DPRA provided a documented response on July 11, 2022 describing how and where the formal comments will be addressed in the Final Draft Report (**Table 4.1, 4th column**). Upon receiving the Final Draft Report, the PRT reviewed it to ensure the documented responses were, in fact, incorporated into the Local/Regional Education Study (**Table 4.1, 5th column**).

Table 4.1 Local/Regional Education Study Draft Report Comment Disposition Table

Comment number	Report section reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
1	General	There needs to be alignment of the options presented with the defined Guiding Principles.	See response to Comment #7 below	This has been satisfactorily addressed.
2	General	Inclusion of metroeconomics data for age cohorts, not just municipal and school board data. GHD has obtained this data from metroeconomics (attached).	DPRA reviewed the metroeconomics cohort data provided by GHD on April 20, 2022, and additional information provided on May 20, 2022, and incorporated it in the revised June V2 Study report. Of note, school boards need to accommodate all growth in enrolment, yet are not able to receive funding for major initiatives to expand capacity until students are officially enrolled.	This has been satisfactorily addressed.
3	General	Consistency across all reports defining the Study Areas, an example can be taken from Workforce Development Study (map on page 15). Study needs to include Kincardine, Saugeen Shores, Aaron-Elderslie, and Ashfield-Colbourne-Wawanosh.	Study areas for each of the community studies were determined collaboratively with MSB/the peer reviewers starting in August 2021 and are reflected in the October 2021 community study work plans. This was further discussed at an April 28 meeting, in context of Education Study/all other study reports.	This has been satisfactorily addressed.
4	General	Education service boundaries 1.3.2.1 identifies 5 School Boards however in 3.1. Table 1 indicates 6 School Boards (missing is Wellington Catholic District School Board).	Wellington Catholic District School Board was not identified in the original Scope of Work for the Study. However, given that the school age population residing in the Town of Minto may enrol with this school board, it was included in the Study data collection and analysis. As such, section 1.3.2.1. was revised to include this school board in the education service boundaries. As they were not interviewed, they have not been added to the Knowledge Holder interview list in Section 2.2.1.	Wellington Catholic District School Board has been added to Section 1.3.2.1 is it also appropriate that they be added to the Knowledge Holder interview list within Section 2.2.1. Wellington Catholic District School Board has been added to the list of Education Service Boundaries however the opening paragraph still reflects 5 School Boards not 6 as listed.

Comment number	Report section reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
5	General	<p>Chapter 3 Existing Conditions presents current education services broken down by County, School Board and Study Area Schools. Missing is the collective analysis of this data to present a local synopsis of area capacity for K-12 increased enrolment. Consideration should be given to natural projected population increase and anticipated NWMO project population increase.</p> <p>a. Age cohort breakdown by Study Area will further inform area demand by K-12.</p>	<p>DPRA utilized the metroeconomics cohort data provided by GHD on April 20, 2022 and May 20 2022 in relation to data on school capacity levels and utilization projections developed by the school boards. This is reflected in the analysis contained in the June 2022 V2 revised draft report.</p> <p>However, we note that a collective analysis of the study area capacity for K-12 increased enrolment may not be particularly useful as the residential location of the student determines the school they attend. As such, school board-specific information regarding capacity is key. For example, finding that the study area overall has surplus capacity in the high schools would not be all that helpful because each school board operates separately from the others and they are only interested in addressing capacity for the students in their catchment area.</p> <p>That being said, and to respond to the PRT comments, DPRA has provided an overview of findings concerning the capacity of study area school boards to accommodate increased enrolment in the June V2 revised draft report (Section 3.7).</p>	This has been satisfactorily addressed.
6	General	<p>This study should reflect findings from the Land Use Study in consideration of future school expansion(s) and new school(s) construction within the Core Study Area. Including findings from the Land Use Study would also reference infrastructure capacity in South Bruce to accommodate any future school construction, existing land availability and zoning considerations.</p> <p>It would be helpful to have fixed vs portable construction/deployment identified within the study (physical space).</p>	<p>The Land Use Study (May 2022) did not consider schools and related land use policy and zoning in detail. DPRA did, however, review the Study to determine if there was any relevant information that can be incorporated into the Education Study. Based on this review, general considerations related to zoning policy for school construction were added to Section 4.4 of the June V2 revised draft report. The Land Use Study authors also reviewed Section 4.4.</p> <p>In addition, Morrison Hershfield's Infrastructure Baseline and Feasibility Study (May 2022) indicates that if a new school were to be located within a Municipality of South Bruce community with existing water/wastewater and other services, and assuming that there would be a couple of years for planning/construction of minor upgrades if needed, then the servicing infrastructure can be provided. These infrastructure considerations were also added to Section 4.4 of the June V2 revised draft report.</p> <p>While an analysis of fixed vs portable construction/deployment is beyond the scope of the Local/Regional</p>	This has been addressed in new section 4.4 Land Use and School Construction Considerations.

Comment number	Report section reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
			Education Study, DPRA did seek to identify data on the portable usage of study area school boards. However, this information could only be identified publicly for the Bruce-Grey Catholic District School Board. Additionally, this approach does not align with school board planning practices (which requires a surplus of students be enrolled before a business case for construction can be submitted).	
7	General	Guiding Principle #32 requires clear evidence how the NWMO will align with this guiding principle: "The NWMO, in consultation with the Municipality and other local and regional partners, will prepare a strategy to ensure there are sufficient community services and amenities, including health, child-care, educational and recreational facilities, to accommodate the expected population growth associated with hosting the Project in South Bruce."	<p>This study provides information that NWMO and MSB can use to develop the programs/ strategies identified in Principles #15 and #32 in the future as part of negotiations of a draft hosting agreement and/ or subsequent studies and discussions if the Project comes to the South Bruce Area.</p> <p>The potential options identified in the draft report provide initial thinking that could contribute to the future programs/strategies; development of the actual programs and strategies is not part of the study objectives / work plan, though.</p> <p>The community studies are not intended to fulfill the Guiding Principles, rather, they provide information that will be used by NWMO, MSB, and partners in the future, both pre- and post-site selection (if the Project comes to the South Bruce Area). This may occur during the development of the draft hosting agreement, and subsequently during the post-site selection planning phase prior to construction.</p> <p>Text has been added to S. 6 Options Assessment to link the proposed options to the Guiding Principles.</p>	This Study informs the education aspect of Guiding Principle #32.

4.2 Comments on Adherence to the Work Plan

The Local/Regional Education Study substantively complies with its approved Work Plan as indicated in **Table 4.2**. The PRT notes that the Local/Regional Education Study does integrate the findings and recommendations of other related Community Studies including Community Studies Planning Assumptions, Labour Baseline Study, Workforce Development Study, Populations Projections Base Case and Anticipated Project Effects, School Age Population Projections, and the Housing Needs and Demand Analysis Study. Also, the PRT acknowledges that the Local/Regional Education Study describes the requirements for increased infrastructure and capacity building for School Boards within the Study Area.

Table 4.2 Adherence to the Work Plan

Step #	Step	Description of Activities	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
Step 1	Data Collection – Secondary/ Primary; updated Project assumptions; information from other related community studies	<ul style="list-style-type: none"> a. Identify and review relevant resources for MSB and neighbouring communities that speak to current and projected school age population, current and projected staff and faculty needs, current capacity of local and regional schools, including planned school infrastructure projects b. Undertake interviews with key knowledge holders 	<p>Step 1(a) has been satisfactorily addressed.</p> <p>Step 1 (b) has been satisfactorily addressed.</p> <ul style="list-style-type: none"> a. Should the project move forward there would be value in an in-depth analysis of initiatives that would optimize school board capacity and capability. The various initiatives would also require agreement from all relevant stakeholder parties including but not limited to the Municipality of South Bruce, NWMO, and school districts. 	Noted/Agreed	This has been satisfactorily addressed.
Step 2	Provide Inputs to and take Outputs from Other Studies	<ul style="list-style-type: none"> a. Share data and findings with other community studies b. Take into considerations data and findings from other studies that are pertinent to the subject study 	<p>Step 2(a) Validation required. We anticipate this has been completed but require validation as to which studies the data and findings were shared with. Simultaneous completion may have impacted data and findings sharing.</p> <p>Step 2(b) Validation required.</p> <ul style="list-style-type: none"> a. Referenced in (2.2) 	<p>As noted in Section 2.2.2, the revised Local/Regional Education Study considered input from the Labour Baseline Study, Workforce Development Study and Housing Needs and Demand Analysis Study reports (Keir Corp., 2022a, 2022b, 2022c), Land Use Study (MHBC and DPRA, 2022) and Infrastructure Baseline and Feasibility Study (Morrison Hershfield, 2022). metroeconomics also provided age cohort data (May 2022) that was used /referenced in the revised draft V2 report.</p> <p>As various 'input studies' were revised, the updated findings were compared and integrated into the updated Local/Regional Education Study (e.g., updated Labour Baseline and Workforce Development study findings in S. 4.2; Housing Needs and Demand Analysis Study in S. 4.3;</p>	This has been satisfactorily addressed.

Step #	Step	Description of Activities	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
				<p>Land Use and Infrastructure Baseline and Feasibility Study in S. 4.4)</p> <p>The authors of the Housing Needs and Demand Analysis Study and the Land Use Study reviewed drafts of Sections 4.3 and 4.4 respectively.</p> <p>a. The Local/Regional Education Study report was shared with/reviewed by some other study authors, but is not a direct data/ information input to them. E.g., the Workforce Development report notes that the Local/ Regional Education Study identifies a set of options related to education in the K-12 grades, including participation in OYAP as part of a potential education stream within NWMO's Corporate Social Responsibility program.</p>	
Step 3	Analysis and assessment, identification of effects management options	<p>a. Identify potential increase in population (due to the APM Project)</p> <p>b. Identify school age populations and describe current and projected capacity of local and regional schools with and without the project</p> <p>c. Identify potential differences between the projected funding for the maintenance and construction local and regional schools with and without the project</p> <p>d. Identify potential options to maintain existing educational infrastructure or new educational</p>	<p>Step 3(a) Comment has been satisfactorily addressed 4.2 and 4.4</p> <p>Step 3(b) Comment has been satisfactorily addressed 3.1-3.6; 3.7</p> <p>Step 3(c) Comment has been satisfactorily addressed 3.7</p> <p>Overview of Study Area Capacity for K-12 Increased Enrolment</p> <p>a. Step 3 (d) Comment has been satisfactorily addressed 6.2</p>	Noted/Agreed	This has been satisfactorily addressed.

Step #	Step	Description of Activities	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
		infrastructure to meet the potential increase in the student population			
Step 4	Observations and Conclusions	<ul style="list-style-type: none"> a. Summarize findings b. Set out observations and conclusions 	<p>6.2/7 This section would benefit from a more robust reflection on the findings; Identify SHSM opportunities</p> <p>Option 3 (“creating a Participatory Social Monitoring Program with MSB, academic partners and local/regional service providers including educators to support research on best practices in the area of participatory social monitoring with the goal of finding new ways to involve stakeholders in the process of gathering and analyzing social monitoring data.”)</p> <ul style="list-style-type: none"> a. This needs further clarification and to be written in simple language. The “so what” of this Option is missing, what is the benefit and alignment to Guiding Principle. 	<p>Based on feedback received on July 8th from the PRT, DPRA will add additional information to Sections 6.2 and 7 of the final report.</p> <p>DPRA will identify SHSM (Specialist High Skills Majors) opportunities in Option 2: Creating an Education-Focused NWMO Corporate Social Responsibility (CSR) Program Stream of Section 6.2 in the final report.</p> <p>In the June V2 revised draft report, DPRA added text to Option 3: Creating a Participatory Social Monitoring Program of Section 6.2 to align with Guiding Principles and to ensure that the purpose of the option is clearly delineated. In DPRA’s view the current text is written in simple language.</p>	This has been satisfactorily addressed.

4.3 Municipality of South Bruce's Guiding Principles

The Local/Regional Education Study informs select principles of the 36 guiding principles established by MSB. The Municipality published a Project Visioning report based on community workshops held in January 2020 that identified areas of community concern and opportunities. Based on the Project Visioning report and further public consultation, MSB passed a Council resolution endorsing the 36 principles that will guide their assessment of willingness to host the APM Project. In light of their importance to MSB, the principles have been individually linked to each of the studies as appropriate to ensure that they were fully considered or accounted for in completing the work (**Appendix D**).

Three of the 36 principles are linked to the Local/Regional Education Study: numbers 10, 15, and 32. **Table 4.3** lists the three principles and how the Local/Regional Education Study informs those principles.

Table 4.3 The Principles Associated with the Local/Regional Education Study

Principle # and Description	Consideration of the Principle in the Study
10. The NWMO will identify the potential for any positive and negative socio-economic impacts of the Project on South Bruce and surrounding communities and what community benefits it will contribute to mitigate any potential risks.	Option 1 aligns with the MSB Guiding Principle #10, as demonstrated in the following example with respect to local and regional education: <ul style="list-style-type: none"> NWMO could provide school boards that operate in South Bruce and the surrounding communities, as well as Mennonite and private schools, with Project-related data and information as soon as possible to help them plan for any future potential impacts. This could be accomplished by NWMO's participation in local/regional education forums and school boards/schools participation in the Participatory Social Monitoring Program.
15. The NWMO, in partnership with the Municipality, will commit to implement programs to engage with and provide opportunities for youth in the community, including investments in education and the provision of scholarships, bursaries and other incentives for youth to remain in or return to the community.	Option 2 aligns with the MSB Guiding Principle # 15, as demonstrated in the following examples with respect to local and regional education: <ul style="list-style-type: none"> NWMO could work with school boards as well as Mennonite and private schools, as a component of the CSR program, to identify areas for donations, funding programs and scholarships. NWMO could participate in education forums, as appropriate, which would allow NWMO to identify areas in which they could provide strategic supports.
32. The NWMO, in consultation with the Municipality and other local and regional partners, will prepare a strategy to ensure there are sufficient community services and amenities, including health, child-care, educational and recreational facilities, to accommodate the expected population growth associated with hosting the Project in South Bruce.	Option 3 aligns with the MSB Guiding Principles #32, as demonstrated by the following example in respect to enhancing/increasing community services: <ul style="list-style-type: none"> NWMO could ask representatives from the school boards that operate in South Bruce and the surrounding communities, as well as from the Mennonite and private schools, to participate in the Participatory Social Monitoring Program along with NWMO, academic institutions and local/regional service providers. Participants would guide the collection and analysis of social monitoring data and support the development of strategic plans to identify and mitigate Project-related education effects and to strengthen Project benefits related to local/regional education. <p>It is noted that this example also supports MSB Guiding Principle #10.</p>

4.4 Conclusions of the Peer Review

The Local/Regional Education Study satisfactorily addresses its objectives, specifically, describing the likely increase in enrolment in local schools (K-12) and potential options to maintain or enhance the educational infrastructure in South Bruce and the neighbouring communities such that it is available in advance of the likely increase in enrolment.

Given the key focus of the Study (pertains to student age population enrolment and the available and potential future capacity to accommodate changes in enrolment), it was necessary to consider the six school boards that service the Study Area including the following:

- Bluewater District School Board (Bruce County and Grey County)
- Bruce-Grey Catholic District School Board (Bruce County and Grey County)
- Avon Maitland District School Board (Huron County and Perth County)

- Huron-Perth Catholic District School Board (Huron County and Perth County)
- Upper Grand District School Board (including Minto/Wellington County, City of Guelph, and County of Dufferin)
- Wellington Catholic District School Board (including Minto/Wellington County and City of Guelph)

The Study acknowledges that there are several limitations that were encountered in conducting the research and analysis, for example, knowledge holder interviews were conducted with limited participation; however, insights and perspectives were valuable in informing the current situation, potential opportunities, challenges to be considered, and the environment in which school boards operate. In addition, there was limited access to current enrolment and capacity data and projections across all school boards, private schools, and Mennonite schools. Where projections are provided by school boards, they vary in timeframe and are relatively short term (i.e., longest available projection is to 2030) compared to the temporal boundaries defined for the Project. Population projections for lower tier municipalities (census subdivisions) vary in availability and scope.

As a result, we note that the Study estimated school age population projections for most of the study area based on County Official Plans and Growth Management Strategies data, which the peer review has raised concerns about in other community studies assessed (e.g., Housing Needs and Demand Analysis Study, Workforce Development Study). Notwithstanding this, the Study did utilize the data projections reflecting the overall school age population for five of the municipalities (including MSB) within the study area provided by metroeconomics.

Given the limitations the research still offers a strong presentation of data and analysis that depict current enrolments among school age populations, impacts of population changes, and the requirements of School Boards to accommodate student enrolments.

Specifically, the Study offers insight into the need (or lack thereof) for additional infrastructure to support secondary school capacity looking out over the next 10 years. Given that significant growth in the school age population of the Study Area municipalities is anticipated between 2021 and 2046, it is acknowledged that the school boards serving these municipalities may not have the ability to accommodate this growth based on the existing capacity of the schools serving the Study Area. Currently the school boards serving the Study Area have utilization rates specific to their schools within the Study Area that range between 68% and 94%. However, projections for population and school utilization growth are not sufficient to proceed with infrastructure planning and development, as school boards may only submit business cases to the Ministry of Education for the construction or expansion of schools, that are based on current enrolment data. Yet, several of the school boards project that they will exceed 100% utilization for elementary or secondary schools serving the Study Area within the next 5 to 15 years.

The 0-19 population in the MSB, Township of Huron-Kinloss, Municipality of Brockton, Municipality of West Grey, and Town of Hanover is expected to increase by 27% over the next 25 years. According to the enrolment projections from Bluewater District School Board, there will be a need for additional infrastructure to support secondary school capacity over the next 10 years.

The 0-19 population in the Township of North Huron, the Municipality of Morris-Turnberry, and the Township of Howick is reported to stay stable, increasing by only 2% over the next 25 years. The enrolment projections from the Avon Maitland District School Board are consistent with the population projections. In fact, enrolment and utilization are expected to decrease over the next 10 years, indicating that there will not be a need for additional infrastructure to support the public-school board in the Study Area.

The 0-19 population in the Town of Minto is expected to experience significant growth, increasing by 46% over the next 25 years. Moreover, the trend of enrolment projections from the Upper Grand District School Board are consistent with the population projections. Elementary utilization is expected to increase to 111% over the next six years, indicating that additional infrastructure may be needed. The secondary schools in the area have more capacity to deal with the population growth, with utilization increasing to only 74% by 2027.

The enrolment projections from the Wellington Catholic District School Board suggest different capacity considerations. For this school board, the elementary schools appear to have the capacity to handle growth with a forecasted utilization rate 91% by 2034. However, over the same timeframe it is anticipated that secondary schools will be over capacity at 113% and will require additional infrastructure to support the growing population.

In conclusion, this Study offers a series of options for consideration to best position the Study Area to address education capacity needs in response to the Project impacts on the school system. Further, options detail specific actions and tactics that NWMO may support to maintain or enhance the educational infrastructure in South Bruce and the neighbouring communities such that it is available in advance of the likely increase in enrolment.

To summarize, options presented will support school boards (as well as Mennonite and private schools) and by extension students, within the Study Area by:

- Providing timely information to school boards (as well as Mennonite and private schools) on projected population and housing numbers that can be used to assist in planning. In the case of Mennonite schools in Huron-Kinloss, key information would relate to Project-related traffic on local roads
- Creating a CSR Program with a stream focused specifically on education, that through partnerships with school boards (as well as Mennonite and private schools), training institutions, local businesses can support activities such as donations, funding programs, scholarships, career pathway development and apprenticeship opportunities for schools and students
- Creating a Participatory Social Monitoring Program with MSB, academic partners and local/regional service providers, including educators, to support:
 - research on best practices in the area of participatory social monitoring with the goal of finding new ways to involve stakeholders in the process of gathering and analyzing social monitoring data
 - the identification of new and existing social indicators that could be monitored to understand potential effects of the Project

In conclusion, the Local/Regional Education Study identifies that South Bruce and the NWMO have a role to play in supporting the capacity and capability of the Study Area to address school age enrolment accommodation and to maintain or enhance the educational infrastructure in South Bruce and the neighbouring communities such that it is available in advance of the likely increase in enrolment.

Appendices

Appendix A

List of Socio-Economic Community Studies

Appendix A. List of Socio-Economic Community Studies

ID	Study Name	Study Proponent	Lead Consultant
E01	Local Economic Development Study & Strategy	MSB	Deloitte
E02	Economic Development Program - Youth	MSB	Deloitte
E03	Local Hiring Effects Study & Strategy	MSB	Deloitte
E04	Demographics	MSB	Keir Corp.
E05	Agricultural Task Force/Agricultural Business Impact Study	MSB	Deloitte
E06	Fiscal Impact and Public Finance	MSB	Watson & Associates Economists
E07	Tourism Industry Effects & Strategy	MSB	Deloitte
E08	Housing Needs and Demand Analysis Study	NWMO, MSB	Keir Corp.
E09	Labour Baseline Study	NWMO	Keir Corp.
E10	Workforce Development Study	NWMO	Keir Corp.
E11	Regional Economic Development Study	NWMO	Keir Corp.
E12	Property Value Monitoring Program		
I21	Aggregate Resources Study	NWMO, MSB	Keir Corp.
I22	Infrastructure Baseline and Feasibility Study	NWMO	Morrison Hershfield
I23	Local Traffic Effects Study	NWMO	Morrison Hershfield
I24	Road Conditions Effects Study	NWMO	Morrison Hershfield
S13	Effects on Recreational Resources	MSB	Tract Consulting
S14	Local/Regional Education Study	NWMO, MSB	DPRA
S15	Land Use Study	NWMO, MSB	DPRA
S16	Social Programs Study	NWMO, MSB	DPRA
S17	Emergency Services Study	NWMO	DPRA
S18	Vulnerable Populations Baseline and Effects Study	NWMO	DPRA
S19	Effects on Community Safety		
S20	Community Health Programs and Health Infrastructure Study	NWMO	DPRA

Appendix B

Peer Review Protocol

South Bruce Consultants Peer Review Protocol

Protocol for Peer Review Process

1. The scope of the peer review is variable for each NWMO study (Study). The scope and objective of each Study is variable. The Study may include development of information, data and documents in the form of a:

- Statement of Work
- Work plan
- Baseline conditions
- Modeling/prediction/forecast of future conditions
- An assessment of impact/benefits

Not all NWMO studies will include each of the above listed elements. While a collaborative peer review approach is to be used, it is important to maintain independence during the peer review process.

2. Develop an initial understanding of NWMO inputs to conducting the Study including timing, availability and sources of information.
3. Meet with NWMO and their consultants to
 - compile a list of information/documents that will need to be reviewed as part of the Peer Review
 - compile a list of parties/agencies providing information for use in preparing the Study
 - identify additional information/sources that may be pertinent to the Study
4. Undertake an initial review of the information/documents assembled and developed for the Study
 - Peer review of the SoW will include information and data pertaining to some or all of the following elements:
 - i.) Statement of Work (SoW)
 - ii.) Work plan
 - iii.) Baseline conditions
 - Provide questions/comments to NWMO on the available information/documents and ensure they have been adequately addressed with the community in mind.
5. Conduct peer review of the Study findings as they are developed which may include the following:
 - i.) Project design(s)
 - ii.) Modeling of future conditions
 - iii.) Impact assessment approach
 - iv.) Impact assessment findings
 - v.) Analysis of reliability
 - If warranted, work with NWMO and their consultants to conduct a site visit
6. Meet with NWMO and their consultants to:
 - Seek clarifications of the information/documents reviewed
 - Ensure a full understanding of the assessment approach and findings
 - Present the preliminary peer review findings (concurrences and concerns)



- Provide questions/comments and peer review findings and ensure they have been adequately addressed with the community in mind.
7. Review NWMO draft reports
 - Complete a detailed review of the draft reports
 - Identify omissions and/or inconsistencies if they occur with SOW and Work Plan
 8. Prepare draft Peer Review Report for submission to South Bruce for comments.
 - Include a summary of peer review observations, findings, and comments
 9. South Bruce will review with RedBrick for communications to public
 10. Finalize and present the Peer Review Report to South Bruce and NWMO
 11. Each consultant will need to provide a presentation of the findings of the peer reviews to the CLC.

Table of Contents for Peer Review Report

1. Introduction
 - a. State the purpose of the Peer Review Report (Report)
 - b. Provide capsule summary of the proposed Project
 - c. Identify the NWMO Study that is being peer reviewed
 - d. Identify the NWMO Statement of Work for completing the Study (i.e., SOW from EOI or update)
 - e. Identify participants involved in conducting the Study
 - f. Identify the time period the Study work and Peer Review was carried out
2. Peer Review Objectives and Process
 - a. State objectives for conducting the Peer Review which include
 - i. To provide the community of SB with independent review by qualified subject matter experts
 - ii. To complete a peer review of the NWMO Assessment of potential impacts and proposed benefits in comparison to existing conditions
 - iii. To review how the potential impacts and proposed benefits adhere to the 36 principles that will guide the assessment of willingness to host the Project.
 - b. Describe the Peer Review Process Undertaken
 - i. Describe the Peer Review process that was carried out.
 - ii. List activities completed (e.g., site visits, work plan review, data review, report review, meetings, etc.)
3. Documentation and Information Reviewed
 - a. List NWMO study specific information reviewed which may include:
 - i. Scope of work
 - ii. Detailed work plan
 - iii. Baseline Conditions
 - iv. Assessment Approach
 - v. Assessment Findings
 - b. List parties/agencies involved in providing information into the study
 - c. List all documents/meetings/data/additional information and include a short summary of each
4. Peer Review Findings and Resolution
 - a. Baseline Conditions Report (concurrences and concerns and resolution)

- b. Impact Assessment (IA) Report
 - i. IA approach (concurrences and concerns and resolution)
 - ii. IA findings (concurrences and concerns and resolution)
 - c. Conclusions of peer review
 - d. Adherence to the 36 principles which are pertinent to the study
5. Summary

Appendix C

Peer Review Comments Memo



Memorandum

June 23, 2022 – updated July 21, 2022

To	Dave Rushton/Catherine Simpson, Municipality of South Bruce		
Copy to			
From	Greg Ferraro and Ian Dobrindt/AD/mm	Tel	+1 519 884 0510
Subject	Local/Regional Education Study (S14) Draft Report – Peer Review Comments	Project no.	11224152-MEM-27

1. Introduction

This memo provides the Municipality of South Bruce (South Bruce) peer review team’s (PRT) comments on the Local/Regional Education Study (S14) Draft Report (Draft Report) prepared by DPRA (V1 March 28, 2022) and Revised Draft Report (V2 June 3, 2022) for your consideration and internal circulation as per the South Bruce Nuclear Exploration Project joint study review flow process. In addition, the memo will be submitted to the Nuclear Waste Management Organization (NWMO) and their consultants (DPRA Canada) by GHD Limited (GHD) as per the peer review protocol process.

2. Peer review approach

The peer review of the Draft Report was carried out by Deloitte and GHD. The peer review process was completed in alignment with the peer review protocol that was developed to support a collaborative approach between NWMO and South Bruce while maintaining independence during the process. In accordance with the peer review protocol process, Deloitte (Subject Matter Expert) and GHD (Lead Consultant) considered the following information during our individual reviews of the Local/Regional Education Study Draft Report/Revised Draft Report:

- Local/Regional Education Study - Statement of Work (May 2021)
- Southwestern Ontario Local/Regional Education Study Work Plan (S14), prepared by DPRA Canada Inc. (October 7, 2021)
- Knowledge holder interviews
- Peer review comments on NWMO’s draft project description for South Bruce community studies memo prepared by GHD Limited (November 18, 2021) and responded to by NWMO (January 27, 2022)
- South Bruce and area growth expectations memo prepared by metro economics (February 7, 2022)

Both Deloitte and GHD reviewed the Draft Report/Revised Draft Report having the following questions in mind:

- Are there any significant concerns, issues, and/or omissions with the Draft Report?
- What are our initial observations/impressions on the Draft Report?
 - Has the work plan been complied with?
 - Has pertinent information gained from knowledge holder interviews been included?
 - Has a previous NMWO response of deferring a peer review team comment to the Draft Report task been complied with?
 - Have peer review comments made during the community study workshops been addressed?
 - Does the Draft Report reflect the most current information available?

Deloitte and GHD discussed our initial observations and confirmed our combined preliminary comments on the Draft Report at our 10-day peer review check-in meeting. Following this, Deloitte and GHD shared our initial observations/preliminary comments with NWMO and their consultants through a discussion where questions were asked, clarifications were sought, and suggestions were offered. Following this discussion, our comments were further revised and are listed in the attached comment disposition Table (**Table 1**).

3. Peer review comments

As stated, the comment disposition table (**Table 1**) lists our combined comments on the Draft Report. Although the expectation established in the peer review protocol is that NWMO and their consultants will provide responses to **Table 1** comments following its receipt, NWMO and their consultants have submitted their responses to the preliminary comments GHD gave them in advance of the April 28, 2022 discussion. In addition, NWMO and their consultants submitted a revised draft report (V2 June 3, 2022). As a result, **Table 1** has been advanced further than normal with the PRT providing initial feedback to NWMO and their consultants' responses on those comments considered 'substantive'. The 'non-substantive' comments have been removed from **Table 1**.

We understand that NWMO and their consultants will finalize the Local/Regional Education Study Report taking into account the following:

- The April 28, 2022 discussion
- The 'non-substantive' preliminary comments (e.g., references, table/figure numbering, inconsistencies between text and tables/figures, incorrectly labeled information, spelling, etc.)
- The initial feedback provided by PRT in **Table 1**
- The July 8 discussion of a June 23 draft of the final PRT comments

The overall objective of the Local/Regional Education Study as described within section 1.3 Purpose and Scope, is to "assess the effects of the Project on the local and regional education services (elementary through high school)". The Study address two main objectives that included analysing the potential increase to enrolment in local schools and to describe the strategies to maintain or enhance the education infrastructure in South Bruce.

The Municipality of South Bruce established Guiding Principles in 2020 that seek to set a context for should the Project proceed, what are the benefits and impacts on the local community. The Local/Regional Education Study is relevant to the MSB Guiding Principles #10, #15, and #32:

- #10: "The NWMO will identify the potential for any positive and negative socio-economic impacts of the Project on South Bruce and surrounding communities and what community benefits it will contribute to mitigate any potential risks."

- #15: “The NWMO, in partnership with the Municipality, will commit to implement programs to engage with and provide opportunities for youth in the community, including investments in education and the provision of scholarships, bursaries and other incentives for youth to remain in or return to the community.”
- #32: “The NWMO, in consultation with the Municipality and other local and regional partners, will prepare a strategy to ensure there are sufficient community services and amenities, including health, child-care, educational and recreational facilities, to accommodate the expected population growth associated with hosting the Project in South Bruce.”

The Study provides a detailed description of the decision-making process leading to Ministry approval for new school infrastructure or increased school capacity. Additionally, the Study supports the readers understanding of student population growth with and without the Project.

Overall, the Study details the current enrolment capacity and utilization rates for schools within the Study area providing a clear understanding the schools abilities to accommodate additional students as a result of the Project. Data was provided by municipalities and school boards and new data was provided by metroeconomics to assist in this analysis. It is noted that school boards have a duty to accommodate students within their boundaries irrespective of school capacity.

Should the project proceed, it is anticipated that information from across the Studies will be aggregated. Additionally, should the project move forward there would be value in an in-depth analysis of initiatives that would optimize school board capacity and capability. The various initiatives would also require agreement from all relevant stakeholder parties including but not limited to the Municipality of South Bruce, NWMO, and school districts.

Table 1 Local/Regional Education Study Report Comment Disposition Table

Comment number	Report section reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
1	General	There needs to be alignment of the options presented with the defined Guiding Principles.	See response to Comment #7 below	This has been satisfactorily addressed.
2	General	Inclusion of metroeconomics data for age cohorts, not just municipal and school board data. GHD has obtained this data from metroeconomics (attached).	DPRA reviewed the metroeconomics cohort data provided by GHD on April 20, 2022, and additional information provided on May 20, 2022, and incorporated it in the revised June V2 Study report. Of note, school boards need to accommodate all growth in enrolment, yet are not able to receive funding for major initiatives to expand capacity until students are officially enrolled.	This has been satisfactorily addressed.
3	General	Consistency across all reports defining the Study Areas, an example can be taken from Workforce Development Study (map on page 15). Study needs to include Kincardine, Saugeen Shores, Aaron-Elderslie, and Ashfield-Colbourne-Wawanosh.	Study areas for each of the community studies were determined collaboratively with MSB/the peer reviewers starting in August 2021 and are reflected in the October 2021 community study work plans. This was further discussed at an April 28 meeting, in context of Education Study/all other study reports.	This has been satisfactorily addressed.
4	General	Education service boundaries 1.3.2.1 identifies 5 School Boards however in 3.1. Table 1 indicates 6 School Boards (missing is Wellington Catholic District School Board).	Wellington Catholic District School Board was not identified in the original Scope of Work for the Study. However, given that the school age population residing in the Town of Minto may enrol with this school board, it was included in the Study data collection and analysis. As such, section 1.3.2.1. was revised to include this school board in the education service boundaries. As they were not interviewed, they have not been added to the Knowledge Holder interview list in Section 2.2.1.	Wellington Catholic District School Board has been added to Section 1.3.2.1 is it also appropriate that they be added to the Knowledge Holder interview list within Section 2.2.1. Wellington Catholic District School Board has been added to the list of Education Service Boundaries however the opening paragraph still reflects 5 School Boards not 6 as listed.
5	General	Chapter 3 Existing Conditions presents current education services broken down by County, School Board and	DPRA utilized the metroeconomics cohort data provided by GHD on April 20, 2022 and May 20 2022 in relation to data on school capacity levels and utilization projections developed by the school boards. This is	This has been satisfactorily addressed.

Comment number	Report section reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
		<p>Study Area Schools. Missing is the collective analysis of this data to present a local synopsis of area capacity for K-12 increased enrolment. Consideration should be given to natural projected population increase and anticipated NWMO project population increase.</p> <p>a. Age cohort breakdown by Study Area will further inform area demand by K-12.</p>	<p>reflected in the analysis contained in the June 2022 V2 revised draft report.</p> <p>However, we note that a collective analysis of the study area capacity for K-12 increased enrolment may not be particularly useful as the residential location of the student determines the school they attend. As such, school board-specific information regarding capacity is key. For example, finding that the study area overall has surplus capacity in the high schools would not be all that helpful because each school board operates separately from the others and they are only interested in addressing capacity for the students in their catchment area.</p> <p>That being said, and to respond to the PRT comments, DPRA has provided an overview of findings concerning the capacity of study area school boards to accommodate increased enrolment in the June V2 revised draft report (Section 3.7).</p>	
6	General	<p>This study should reflect findings from the Land Use Study in consideration of future school expansion(s) and new school(s) construction within the Core Study Area. Including findings from the Land Use Study would also reference infrastructure capacity in South Bruce to accommodate any future school construction, existing land availability and zoning considerations.</p> <p>It would be helpful to have fixed vs portable construction/deployment identified within the study (physical space).</p>	<p>The Land Use Study (May 2022) did not consider schools and related land use policy and zoning in detail. DPRA did, however, review the Study to determine if there was any relevant information that can be incorporated into the <i>Education Study</i>. Based on this review, general considerations related to zoning policy for school construction were added to Section 4.4 of the June V2 revised draft report. The Land Use Study authors also reviewed Section 4.4.</p> <p>In addition, Morrison Hershfield's <i>Infrastructure Baseline and Feasibility Study</i> (May 2022) indicates that if a new school were to be located within a Municipality of South Bruce community with existing water/wastewater and other services, and assuming that there would be a couple of years for planning/construction of minor upgrades if needed, then the servicing infrastructure can be provided. These infrastructure considerations were also added to Section 4.4 of the June V2 revised draft report.</p> <p>While an analysis of fixed vs portable construction/deployment is beyond the scope of the <i>Local/Regional Education Study</i>, DPRA did seek to identify data on the</p>	This has been addressed in new section 4.4 Land Use and School Construction Considerations.

Comment number	Report section reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
			portable usage of study area school boards. However, this information could only be identified publicly for the Bruce-Grey Catholic District School Board. Additionally, this approach does not align with school board planning practices (which requires a surplus of students be enrolled before a business case for construction can be submitted).	
7	General	Guiding Principle #32 requires clear evidence how the NWMO will align with this guiding principle: “The NWMO, in consultation with the Municipality and other local and regional partners, will prepare a strategy to ensure there are sufficient community services and amenities, including health, child-care, educational and recreational facilities, to accommodate the expected population growth associated with hosting the Project in South Bruce.”	<p>This study provides information that NWMO and MSB can use to develop the programs/ strategies identified in Principles #15 and #32 in the future as part of negotiations of a draft hosting agreement and/ or subsequent studies and discussions if the Project comes to the South Bruce Area.</p> <p>The potential options identified in the draft report provide initial thinking that could contribute to the future programs/strategies; development of the actual programs and strategies is not part of the study objectives / work plan, though.</p> <p>The community studies are not intended to fulfill the Guiding Principles, rather, they provide information that will be used by NWMO, MSB, and partners in the future, both pre- and post-site selection (if the Project comes to the South Bruce Area). This may occur during the development of the draft hosting agreement, and subsequently during the post-site selection planning phase prior to construction.</p> <p>Text has been added to S. 6 Options Assessment to link the proposed options to the Guiding Principles.</p>	This Study informs the education aspect of Guiding Principle #32.

Table 2 Assessment of the study work plan - Table 1. Local/Regional Education Study Approach

Step #	Step	Description of Activities	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
Step 1	Data Collection – Secondary/ Primary; updated Project assumptions; information from other related community studies	<ul style="list-style-type: none"> a. Identify and review relevant resources for MSB and neighbouring communities that speak to current and projected school age population, current and projected staff and faculty needs, current capacity of local and regional schools, including planned school infrastructure projects b. Undertake interviews with key knowledge holders 	<p>Step 1(a) has been satisfactorily addressed.</p> <p>Step 1 (b) has been satisfactorily addressed.</p> <ul style="list-style-type: none"> a. Should the project move forward there would be value in an in-depth analysis of initiatives that would optimize school board capacity and capability. The various initiatives would also require agreement from all relevant stakeholder parties including but not limited to the Municipality of South Bruce, NWMO, and school districts. 	Noted/Agreed	This has been satisfactorily addressed.
Step 2	Provide Inputs to and take Outputs from Other Studies	<ul style="list-style-type: none"> a. Share data and findings with other community studies b. Take into considerations data and findings from other studies that are pertinent to the subject study 	<p>Step 2(a) Validation required. We anticipate this has been completed but require validation as to which studies the data and findings were shared with. Simultaneous completion may have impacted data and findings sharing.</p> <p>Step 2(b) Validation required.</p> <ul style="list-style-type: none"> a. Referenced in (2.2) 	<p>As noted in Section 2.2.2, the revised <i>Local/Regional Education Study</i> considered input from the <i>Labour Baseline Study</i>, <i>Workforce Development Study</i> and <i>Housing Needs and Demand Analysis Study</i> reports (Keir Corp., 2022a, 2022b, 2022c), <i>Land Use Study</i> (MHBC and DPRA, 2022) and <i>Infrastructure Baseline and Feasibility Study</i> (Morrison Hershfield, 2022). metroeconomics also provided age cohort data (May 2022) that was used /referenced in the revised draft V2 report.</p> <p>As various 'input studies' were revised, the updated findings were compared and integrated into the updated <i>Local/Regional Education Study</i> (e.g., updated <i>Labour Baseline</i> and <i>Workforce Development</i> study</p>	This has been satisfactorily addressed.

Step #	Step	Description of Activities	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
				<p>findings in S. 4.2; <i>Housing Needs and Demand Analysis Study</i> in S. 4.3; <i>Land Use and Infrastructure Baseline and Feasibility Study</i> in S. 4.4)</p> <p>The authors of the <i>Housing Needs and Demand Analysis Study</i> and the <i>Land Use Study</i> reviewed drafts of Sections 4.3 and 4.4 respectively.</p> <p>a. The <i>Local/Regional Education Study</i> report was shared with/reviewed by some other study authors, but is not a direct data/ information input to them. E.g., the <i>Workforce Development</i> report notes that the <i>Local/Regional Education Study</i> identifies a set of options related to education in the K-12 grades, including participation in OYAP as part of a potential education stream within NWMO's Corporate Social Responsibility program.</p>	
Step 3	Analysis and assessment, identification of effects management options	<p>a. Identify potential increase in population (due to the APM Project)</p> <p>b. Identify school age populations and describe current and projected capacity of local and regional schools with and without the project</p> <p>c. Identify potential differences between the projected funding for the maintenance and construction local and</p>	<p>Step 3(a) Comment has been satisfactorily addressed 4.2 and 4.4</p> <p>Step 3(b) Comment has been satisfactorily addressed 3.1-3.6; 3.7</p> <p>Step 3(c) Comment has been satisfactorily addressed 3.7</p> <p>Overview of Study Area Capacity for K-12 Increased Enrolment</p> <p>a. Step 3 (d) Comment has been satisfactorily addressed 6.2</p>	Noted/Agreed	This has been satisfactorily addressed.

Step #	Step	Description of Activities	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
		<p>regional schools with and without the project</p> <p>d. Identify potential options to maintain existing educational infrastructure or new educational infrastructure to meet the potential increase in the student population</p>			
Step 4	Observations and Conclusions	<p>a. Summarize findings</p> <p>b. Set out observations and conclusions</p>	<p>6.2/7 This section would benefit from a more robust reflection on the findings; Identify SHSM opportunities</p> <p>Option 3 (“creating a Participatory Social Monitoring Program with MSB, academic partners and local/regional service providers including educators to support research on best practices in the area of participatory social monitoring with the goal of finding new ways to involve stakeholders in the process of gathering and analyzing social monitoring data.”)</p> <p>a. This needs further clarification and to be written in simple language. The “so what” of this Option is missing, what is the benefit and alignment to Guiding Principle.</p>	<p>Based on feedback received on July 8th from the PRT, DPRA will add additional information to Sections 6.2 and 7 of the final report.</p> <p>DPRA will identify SHSM (Specialist High Skills Majors) opportunities in Option 2: Creating an Education-Focused NWMO Corporate Social Responsibility (CSR) Program Stream of Section 6.2 in the final report.</p> <p>In the June V2 revised draft report, DPRA added text to Option 3: Creating a Participatory Social Monitoring Program of Section 6.2 to align with Guiding Principles and to ensure that the purpose of the option is clearly delineated. In DPRA’s view the current text is written in simple language.</p>	This has been satisfactorily addressed.

Appendix D

36 Guiding Principles

South Bruce Guiding Principles for NWMO's Site Selection Process

The Nuclear Waste Management Organization (NWMO) is seeking an informed and willing host for a deep geologic repository (DGR) to safely store Canada's used nuclear fuel, and a Centre for Expertise. To guide its work, South Bruce held a comprehensive visioning process in 2019 and 2020 to get input on what people cared about most in relation to the Project. The process, in addition to other community input and feedback resulted in the creation of 36 Guiding Principles which focus on safety for people and the environment, ensuring the Project brings meaningful benefits to the community, and ensuring the municipality has a voice in decision-making.

The principles were adopted by Council resolution and they have guided municipal activities and engagement related to the Project. South Bruce is seeking NWMO commitments on how it would meet or address these 36 expectations and aspirations for the Project. This is a key step in determining whether the Project is right for the community and will help people make an informed decision when a public referendum is held to measure willingness to be a host community.

Safety and the Natural Environment

1. The NWMO must demonstrate to the satisfaction of the Municipality that the Project will be subject to the highest standards of safety across its lifespan of construction, operation and into the distant future.
2. The NWMO must demonstrate to the satisfaction of the Municipality that sufficient measures will be in place to ensure the natural environment will be protected, including the community's precious waters, land and air, throughout the Project's lifespan of construction, operation and into the distant future.
3. The NWMO must demonstrate to the satisfaction of the Municipality that used nuclear fuel can be safely and securely transported to the repository site.
4. The NWMO will ensure that the repository site will not host any nuclear waste generated by other countries.
5. The NWMO must commit to implementing the Project in a manner consistent with the unique natural and agricultural character of the community of South Bruce.
6. The NWMO will minimize the footprint of the repository's surface facilities to the extent it is possible to do so and ensure that public access to the Teeswater River is maintained, subject to meeting regulatory requirements for the repository.
7. The NWMO must commit to preparing construction management and operation plans that detail the measures the NWMO will implement to mitigate the impacts of construction and operation of the Project.

People, Community and Culture

8. The NWMO must demonstrate to the satisfaction of the Municipality that it has built broad support for the Project within the community of South Bruce.
 9. The Municipality will, in collaboration with community members, develop and establish an open and transparent process that will allow the community to express its level of willingness to host the Project.
 10. The NWMO will identify the potential for any positive and negative socio-economic impacts of the Project on South Bruce and surrounding communities and what community benefits it will contribute to mitigate any potential risks.
 11. The NWMO, in consultation with the Municipality, will establish a property value protection program to compensate property owners in the event that property values are adversely affected by the NWMO's site selection process and the development, construction and/or operation of the Project.
 12. The NWMO, in consultation with the Municipality, will establish a program to mitigate losses to business owners in the event that their business is adversely affected by the NWMO's site selection process and the development, construction and/or operation of the Project.
 13. The NWMO, in partnership with the Municipality, will develop a strategy and fund a program to promote the agriculture of South Bruce and the surrounding communities.
 14. The NWMO, in partnership with the Municipality, will develop a strategy and fund a program to promote tourism in South Bruce and the surrounding communities.
 15. The NWMO, in partnership with the Municipality, will commit to implement programs to engage with and provide opportunities for youth in the community, including investments in education and the provision of scholarships, bursaries and other incentives for youth to remain in or return to the community.
 16. The NWMO will implement the Project in a manner that promotes diversity, equality and inclusion.
 17. The Municipality recognizes the important historic and contemporary roles Indigenous peoples have and continue to play in the stewardship of the lands we all call home and will, in the spirit of Reconciliation, work with the NWMO and local Indigenous peoples to build mutually respectful relationships regarding the Project.
 18. The NWMO will commit to relocate the working location of a majority of its employees to South Bruce as soon as it is reasonably practicable to do so after the completion of the site selection process.
 19. The NWMO will, in consultation with the Municipality, establish a Centre of Expertise at a location within South Bruce to be developed in conjunction with the Project.
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Economics and Finance

20. The NWMO, in consultation with the Municipality, will commit to implementing a local employment and training strategy with the objective of ensuring that the majority of employees for the Project are located within South Bruce and surrounding communities.
21. The NWMO, in consultation with the Municipality, will commit to implementing a business opportunities strategy that will provide opportunities for qualified local businesses to secure agreements that support the Project and that requires the NWMO to take all reasonable steps to create opportunities for qualified local businesses to benefit from the Project.
22. The NWMO will commit to implementing a procurement strategy for the Project that gives preference to the selection of suppliers who can demonstrate economic benefit to South Bruce and surrounding communities.
23. The NWMO will enter into an agreement with the Municipality providing for community benefit payments to the Municipality.
24. The NWMO agrees to cover the costs of the Municipality's preparation for and participation in the Project's regulatory approval processes, including the Canadian Nuclear Safety Commission's licencing process and the assessment of the Project under the Impact Assessment Act (or other similar legislation), that are not otherwise covered by available participant funding.
25. The NWMO will fund the Municipality's preparation of a housing plan to ensure that the residents of South Bruce have access to a sufficient supply of safe, secure, affordable and well-maintained homes.
26. The NWMO will prepare a review of the existing emergency services in South Bruce and provide appropriate funding for any additional emergency services required to host the Project in South Bruce.
27. The NWMO will prepare an infrastructure strategy that addresses any municipal infrastructure requirements for the Project and will commit to providing appropriate funding for any required upgrades to municipal infrastructure required to host the Project in South Bruce.
28. The NWMO will cover the costs incurred by the Municipality in assessing community well-being and willingness to host the Project.
29. The NWMO will fund the engagement of subject matter experts by the Municipality to undertake peer reviews of Project reports and independent assessments of the Project's potential impacts on and benefits for the community as determined necessary by the Municipality.
30. The NWMO will enter into a road use agreement with the Municipality that identifies approved transportation routes during construction and operation of the Project and ensures proper funding for maintenance and repair of municipal roads and bridges used for the Project.

Capacity Building

24. The NWMO will cover the costs incurred by the Municipality in assessing community well-being and willingness to host the Project.
25. The NWMO will fund the engagement of subject matter experts by the Municipality to undertake peer reviews of Project reports and independent assessments of the Project's potential impacts on and benefits for the community as determined necessary by the Municipality.
30. The NWMO will prepare a review of the existing and projected capacity of South Bruce's road network and will commit to providing appropriate funding for any required upgrades to the road network.
31. The NWMO will enter into a road use agreement with the Municipality that identifies approved transportation routes during construction and operation of the Project and ensures proper funding for maintenance and repair of municipal roads and bridges used for the Project.

Capacity Building (continued)

32. The NWMO, in consultation with the Municipality and other local and regional partners, will prepare a strategy to ensure there are sufficient community services and amenities, including health, child-care, educational and recreational facilities, to accommodate the expected population growth associated with hosting the Project in South Bruce.
33. The NWMO will comply with the Municipal Official Plan and zoning by-law and seek amendments to the Official Plan and zoning by-law as necessary to implement the Project.

Regional Benefits

36. The NWMO must demonstrate to the satisfaction of the Municipality that the Project will benefit the broader region outside of the community of South Bruce, including local Indigenous communities.

Governance and Community Engagement

34. The NWMO will provide the Municipality with an ongoing and active role in the governance of the Project during the construction and operation phases of the Project.
35. The NWMO will continue to engage with community members and key stakeholders to gather input on community vision, expectations and principles, including concerns, related to the Project.

Reach out anytime with your questions, comments, concerns, or if you are seeking more information. We would be happy to hear from you!

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