



Peer Review Report

Vulnerable Populations (S18) and Social Programs (S16) Studies Report

Municipality of South Bruce

November 02, 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 2024.

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, 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 [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 Vulnerable Populations (S18) and Social Programs (S16) Studies are two of the studies being carried out by NWMO. The overall objective of the Vulnerable Populations Study is to identify the vulnerable populations in the Study Area, the effects that they may feel as a result of the Project, and steps that could be taken to mitigate those effects. The overall objective of the Social Programs Study is to assess the effects of the Project on the community programs offered by Bruce County, such as children's programs including assisted day care and learning programs, plus community programs for adults, seniors and families that are made available to the residents of South Bruce at the commencement of construction and of operations. The Studies were peer reviewed by a Subject Matter Expert (SME) at GHD (Brigitte Masella) 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 Vulnerable Populations and Social Programs Studies 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 concludes that the Vulnerable Populations and Social Programs Studies Revised Final Report satisfactorily addresses the objectives of the Work Plans by identifying certain potential Project effects. The PRT has, however, identified areas of further beneficial study described in this report to more fully assess the potential Project effects on a wider range of vulnerable populations and social programs/services, which would presumably lead to refining the mitigation/enhancement options and to fleshing out the Participatory Social Monitoring (PSM) Program. The PRT suggests that some future studies be conducted to inform the MSB's decision about its willingness to host the Project, while others be conducted as part of a more detailed impact assessment should South Bruce be selected as the preferred location for the Project. The proposed studies would serve to address the following principal recommendations:

- Sufficiently incorporate and reconcile the relevant findings and recommendations of other community studies (and the associated peer review reports) to permit fuller analysis of the potential Project effects on vulnerable populations and social programs/services, as some of those effects are considered to be inadequately addressed. Doing so will allow for validation of key assumptions, in particular those regarding the availability of an existing large and capable regional workforce for Project construction and operations and an insignificant increase in the Project-related MSB population and cost of living.

More broadly, the PRT suggests that the future studies into the potential effects of the Project on the socio-economic environment be less piecemeal and apply suitable analytical frameworks (e.g., Gender-based Analysis Plus; Determinants of Health) that permit a more systematic and comprehensive assessment of the potential effects on vulnerable populations and social programs/services.

- Provide a focused analysis of the potential effects of the Project on vulnerable populations and/or social programs/services that are not adequately addressed. This would presumably lead to refining the mitigation/enhancement options and to fleshing out the PSM Program.

In closing, the PRT notes that the term “vulnerable populations” may stigmatize the members of groups labelled as “vulnerable” and conceal structural factors of inequity. An alternate term could be “overburdened populations,” who are disproportionately exposed to environmental and socio-economic burdens. A discussion involving the relevant stakeholders could be foreseen to decide on an appropriate term.

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Acronyms

APM	Adaptive Phased Management
CSR	Corporate Social Responsibility
DPRA	DPRA Canada Inc.
GHD	GHD Limited
MSB	Municipality of South Bruce
NGO	Non-Governmental Organization
NWMO	Nuclear Waste Management Organization
PSM	Participatory Social Monitoring
PRT	Peer Review Team
SME	Subject Matter Expert

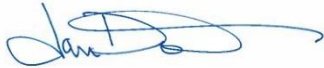
Scope and limitations

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1. Introduction

This report documents the peer review undertaken of the Vulnerable Populations (S18) and Social Programs (S16) Studies Draft Report prepared by DPRA Canada Inc. (DPRA) dated January 31, 2022 (Draft, V1), August 12, 2022 (Revised Draft, V2), August 31, 2022 (Final, V3) and September 12, 2022 (Revised Final, V4). The Nuclear Waste Management Organization (NWMO) has been engaged in a multi-year, 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 socio-economic conditions in the communities and then considering what might be the possible implications of the Adaptive Phased Management (APM) Project on community wellbeing 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 the 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 2024, 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 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 the MSB's 36 Guiding Principles, the NWMO and the MSB are working together to prepare a suite of studies that 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 the NWMO or the MSB, with some being joint efforts. The MSB has retained consultants (Deloitte LLP, Tract Consulting) to develop a number of studies and to peer review others (GHD Limited [GHD] team) developed by the NWMO and their consultants (DPRA). The information acquired through the studies is expected to aid the MSB in making 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 Vulnerable Populations and Social Programs Studies are two of the socio-economic studies being carried out by the NWMO. The overall objective of the Vulnerable Populations Study is to identify the vulnerable populations in the Study Area, the effects that they may feel as a result of the APM Project, and steps that could be taken to mitigate those effects. The overall objective of the Social Programs Study is to assess the effects of the APM Project on the community programs offered by Bruce County, such as children's programs, including assisted day care and learning programs, plus community programs for adults, seniors, and families that are made available to the residents of South Bruce at the commencement of construction and of operations. Given the significant overlap in the subject matter of the two studies, a decision was made to combine the two study reports.

The Vulnerable Populations and Social Programs Studies were peer reviewed by Subject Matter Expert (SME) at GHD (Brigitte Masella) 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 Studies, and the effects assessment, in accordance with the Peer Review Protocol process established jointly by the MSB and the NWMO. **Section 2** elaborates on the Peer Review Protocol process followed, including the steps specifically followed and discussions held with the NWMO/DPRA team.

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

As described in **Section 3**, the PRT considered several documents and information in the Peer Review of the Vulnerable Populations and Social Programs Studies to aid in their understanding, focus the Peer Review, and develop their findings. The results and resolution of the PRT findings are outlined in **Section 4**, followed by a review of how the Studies comply with the approved Work Plans and how they inform the applicable Guiding Principles. Lastly, the conclusions from the Peer Review are provided.

The Vulnerable Populations and Social Programs Studies Revised Final Report identifies potential positive effects, which include:

- Increased employment opportunities
- Increased pool of potential employees
- Increased municipal tax base and increased funds for social programs
- Increased opportunities for academic and training partnerships
- Future supportive housing opportunities
- Enhanced telecommunications infrastructure

In general, it is found that the Project will enhance community sustainability and help create a more vibrant community with increased multiculturalism and community involvement.

The Revised Final Report also identifies potential negative effects, which include:

- Increased cost of living and increased divide between the 'haves' and 'have nots'
- Decreased availability and affordability of housing
- Increased need for culturally appropriate services and supports that may not currently exist
- Increased competition for employees for small businesses and agriculture operations
- Anxiety about possible Project accidents, malfunctions, or environmental contamination

In general, based on the assumption that there will be only a small increase in Project-related population growth, it is found that the Project will not result in a significant increase in pressure on vulnerable populations or existing social programs.

The Revised Final Report states that the NWMO can enhance opportunities or mitigate potential negative effects through the following options:

- Create a Corporate Social Responsibility (CSR) program with a stream for vulnerable population and social programs and services to help address some of the current pressures being placed on vulnerable populations and social programs/services. The CSR program could include such activities as partnership development with local service providers, donations to NGOs/community organizations, funding programs for NGOs/charitable organizations to enhance supports to vulnerable populations, and scholarships.
- Create a Participatory Social Monitoring (PSM) Program to identify new and innovative ways to involve key local stakeholders in the process of gathering and analysing monitoring data
- Possibly convert temporary accommodations for workers to subsidised/transitional housing for vulnerable populations (e.g., low income, seniors) following construction
- Create a Child Care Centre in the Centre for Expertise, and/or leveraging existing local space for the purposes of child care facilities, with a percentage of spaces set aside for low-income families

Given full consideration of the Revised Final Report's findings, the PRT concludes that, in general, the Vulnerable Populations and Social Programs Studies satisfactorily addresses the objectives of the Work Plans by identifying certain potential Project effects. The PRT has, however, identified areas of further beneficial study described in Section 4 of this report to more fully assess the potential Project effects on a wider range of vulnerable populations and social programs/services, which would presumably lead to refining the mitigation/enhancement options and to fleshing out the PSM Program. It is recommended that, as described herein, additional study be conducted to inform the MSB's decision about its willingness to host the Project and that further study be conducted as part of a more detailed impact assessment should South Bruce be selected as the preferred location for the Project.

2. Peer Review Protocol

2.1 Objectives and Overview of the Peer Review Protocol Process

As mentioned, the peer review of the Vulnerable Populations and Social Programs Studies were undertaken in accordance with the Peer Review Protocol established jointly by the MSB and the NWMO. The Peer Review Protocol has 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 the NWMO's assessment of potential impacts and proposed benefits of locating the APM Project in the 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.

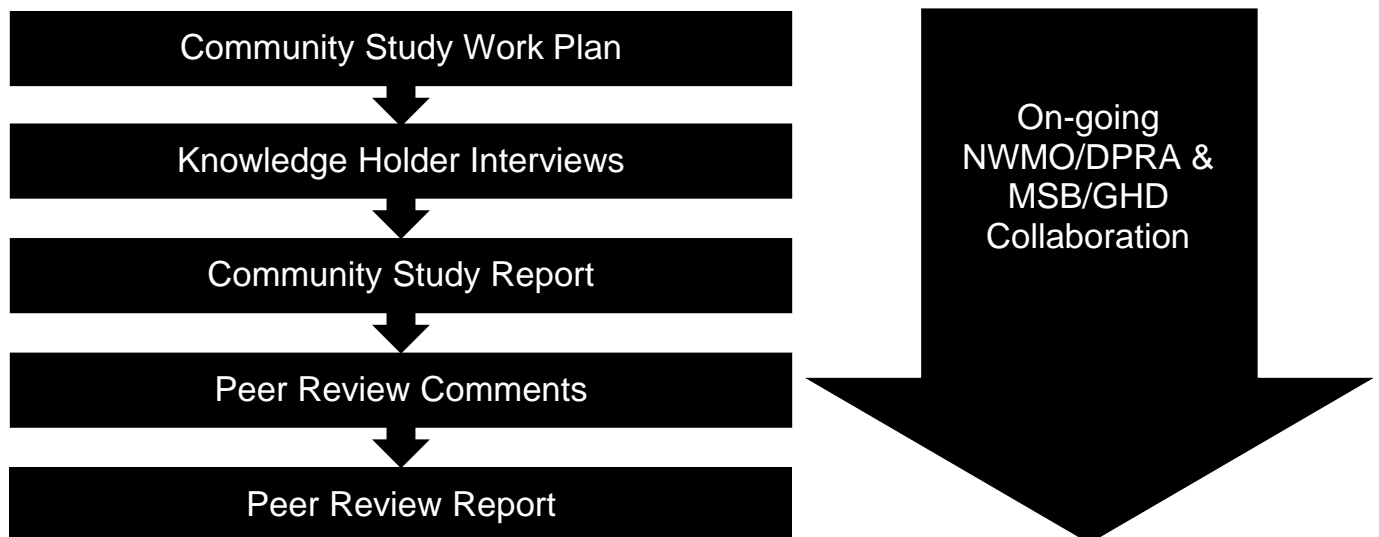


Figure 2.1 The Peer Review Protocol Process

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

Community Study Work Plans

- Review the Statements of Work associated with the Community Studies (CS) prepared by the 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 the NWMO's Project design reports and considering responses received from the 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)
- Review and provide comments on the draft Work Plans 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 Plans before their implementation

Knowledge Holder Interviews

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

Community Studies Report

- Attend CS Draft Report Status Update Meetings organized by the NWMO/DPRA team
- Review the CS Draft Report (V1) prepared by the NWMO/DPRA team
- Review the CS Revised Draft Report (V2) prepared by the NWMO/DPRA team
- Review the CS Final Report (V3) prepared by the NWMO/DPRA team
- Review the CS Revised Final Report (V4) 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 the 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 such items as to 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 Plans.
- In some situations, it was agreed 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 it to the MSB for review
- Finalize the draft Peer Review Report based on any comments received and provide it to the MSB

2.2 Key Activities Associated with the Peer Review of the Vulnerable Populations and Social Programs Studies

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 SME at GHD (Brigitte Masella) in combination with the GHD Leadership Team (Greg Ferraro

and Ian Dobrindt) for the Vulnerable Populations and Social Programs Studies prepared by DPRA. The Vulnerable Populations and Social Programs Studies were initiated by DPRA following finalization of the Work Plans in October 2021 and culminated in the Revised Final Report being submitted to GHD on September 12, 2022.

Table 2.1 *Key Activities Associated with the Peer Review of the Vulnerable Populations and Social Programs Studies*

Key Activities	Date	Parties Involved
Review of the Draft Southwestern Ontario Vulnerable Populations Study Work Plan (S18) and the Draft Southwestern Ontario Social Programs Study Work Plan (S16) issued by DPRA (August 13, 2021)	August 2021 – October 2021	GHD (Brigitte Masella, Greg Ferraro, and Ian Dobrindt)
Issuance of the Peer Review Team comment disposition table on the Draft Work Plans	September 13, 2021	GHD (Brigitte Masella, Greg Ferraro, and Ian Dobrindt)
Review of the Final Southwestern Ontario Vulnerable Populations Study Work Plan (S18) and the Final Southwestern Ontario Social Programs Study Work Plan (S16) issued by DPRA (October 12, 2021)	October 2021 – January 2022	GHD (Brigitte Masella, Greg Ferraro, and Ian Dobrindt)
Review of Vulnerable Populations (S18) and Social Programs (S16) Studies Report - Draft V1 – Southwestern Ontario Community Study issued by DPRA (January 31, 2022)	February 2022 – June 2022	GHD (Brigitte Masella, Greg Ferraro, and Ian Dobrindt)
Peer Review Team Check-in Meeting to review/confirm preliminary comments	February 14, 2022	GHD (Brigitte Masella, Greg Ferraro, and Ian Dobrindt) and MSB (Catherine Simpson)
Issuance of the Peer Review Team preliminary comment disposition table on the Draft Report	February 14, 2022	GHD (Brigitte Masella, Greg Ferraro, and Ian Dobrindt)
Peer Review Team and DPRA Project Update Meeting to discuss/understand the preliminary comments	February 15, 2022	GHD (Brigitte Masella, Greg Ferraro, and Ian Dobrindt) NWMO (Charlene Easton, Tim Weber, and Marvin Stemeroff), and DPRA (Vicki McCulloch and Tracy Farmer)
Issuance of the Peer Review Team formal comment disposition table on the Draft Report	March 10, 2022	GHD (Brigitte Masella, Greg Ferraro, and Ian Dobrindt)
Peer Review Team and DPRA Project Update Meeting to discuss/understand the formal comments	March 14, 2022	GHD (Brigitte Masella, Greg Ferraro, and Ian Dobrindt) and DPRA (Vicki McCulloch)
Issuance of DPRA Team responses to Peer Review Team's formal comments on the Draft Report	July 25, 2022	DPRA (Vicki McCulloch)
Review of Vulnerable Populations and Social Programs Studies Report – Revised Draft V2 – Southwestern Ontario Community Study issued by DPRA (August 12, 2022)	August 12 – 31, 2022	GHD (Brigitte Masella, Greg Ferraro, and Ian Dobrindt)
Review of Vulnerable Populations and Social Programs Studies Report – Final V3 – Southwestern Ontario Community Study issued by DPRA (August 31, 2022)	August 31 – September 12, 2022	GHD (Brigitte Masella, Greg Ferraro, and Ian Dobrindt)

Key Activities	Date	Parties Involved
Review of the Vulnerable Populations (S18) and Social Programs (S16) Studies Report – Revised Final V4 – Southwestern Ontario Community Study issued by DPRA (September 12, 2022)	September 12 – November 1, 2022	GHD (Brigitte Masella, 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 Vulnerable Populations and Social Programs Studies.

Table 3.1 Key Documents and Information Considered in the Peer Review of the Vulnerable Populations and Social Programs Studies

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 the NWMO's consideration and response (January 27, 2022).
Vulnerable Populations and Social Programs Studies - Statements of Work	Municipality of South Bruce (MSB) (May 2021)	Reviewed to understand the objectives and scopes of work, including inputs to the Vulnerable Populations and Social Programs Studies and their relationship to other Community Studies as envisioned by the MSB.
Knowledge Holder Interviews (Community Living Kincardine and District; Women's House Serving Bruce and Grey; Bruce County, Human Services and Health Services; Bruce Grey Child & Family Services; Community Living Walkerton & District; Huron County; Grey Bruce Public Health; South Bruce Grey Health Centre; Bruce County, Long Term Care and Seniors Services; Huron Perth Public Health)	NWMO (August 2021 – April 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 the 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, Social Programs, Vulnerable Populations, etc.). The PRT provided comments (November 18, 2021) for the NWMO's consideration and response (January 27, 2022).

Document Name/Information	Author/Source/Date	Description/Application
Community Studies Planning Assumptions	NWMO (October 18, 2021)	Reviewed to understand certain parameters for the Project. The PRT provided comments (November 18, 2021) for the NWMO's consideration and response (January 27, 2022).
Southwestern Ontario Vulnerable Populations Study Work Plan (S18) and Southwestern Ontario Social Programs Study Work Plan (S16)	DPRA Canada Inc. (October 12, 2021)	Reviewed to understand the purpose and outcome of the Vulnerable Populations and Social Programs Studies, including their linkages to other Community Studies, scope and assumptions, approach, and key information sources/data collection.
Vulnerable Populations (S18) and Social Programs (S16) Studies Report - Draft V1 - Southwestern Ontario Community Study	DPRA Canada Inc. (January 31, 2022)	The draft output/deliverable from completing the final Work Plans 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 the MSB, both from the perspectives of growth independent of the Project as well as the result of the Project.
Review of Vulnerable Populations and Social Programs Studies Report – Revised Draft V2 – Southwestern Ontario Community Study issued by DPRA (August 12, 2022)	August 2022 – September 2022	GHD (Brigitte Masella, Greg Ferraro, and Ian Dobrindt)
Vulnerable Populations (S18) and Social Programs (S16) Studies Report – Final V3 - Southwestern Ontario Community Study	DPRA Canada Inc. (August 31, 2022)	The final output/deliverable from completing the final Work Plans for review by the PRT.
Vulnerable Populations (S18) and Social Programs (S16) Studies Report – Revised Final V4 - Southwestern Ontario Community Study	DPRA Canada Inc. (September 12, 2022)	The revised final output/deliverable from completing the final Work Plans for review by the PRT.

4. Peer Review Findings and Resolution

4.1 Comments on the Vulnerable Populations and Social Programs Studies

The PRT provided formal comments to the NWMO/DPRA team on March 10, 2022 in the form of a memo and comment disposition table (**Appendix C**). In reply, the NWMO/DPRA team provided a documented response on July 25, 2022 describing how and where the formal comments will be addressed in the Revised Final Report (**Appendix C, 4th column**). Upon receiving the Revised Final Report, the PRT reviewed it to ensure the documented responses were, in fact, incorporated into the Vulnerable Populations and Social Programs Studies (**Appendix C, 5th column**).

From the review of the responses to comments and review of the Revised Final Report, the PRT has identified areas of further beneficial study to more fully assess the potential Project effects on a wider range of vulnerable populations and social programs/services. The areas of study and/or actions are summarized below. Pertinent findings from other

community studies that address in whole or in part the recommended areas of study/action are provided to integrate the community study results and objectives as appropriate.

1. *Inclusion of members of vulnerable groups in development of options to mitigate or enhance potential effects*

The knowledge holder consultation process did not involve community members who are vulnerable or who avail of social programs/services. While the knowledge holders consulted can provide relevant insights, they cannot speak on their behalf. Following a recommendation by the PRT in its review of the Draft Report, the Revised Final Report provides for persons with lived experience within the community to be part of the PSM Program.

The PRT recommends that persons with lived experience be included in developing options to mitigate the Project's negative effects and enhance its positive effects, in particular in developing the PSM Program.

2. *Potential effects on students who may be subject to school capacity and career opportunity limitations within the community*

The school boards are responsible for providing tailored support to vulnerable students, who include, without being limited to, students who are at risk of not graduating and students who experience mental health issues. The Project has the potential to add to the pressure on school boards to accommodate students, including vulnerable ones, in line with community expectations. The Local/Regional Education Study and Peer Review recommend that NWMO provide timely Project Description updates that include employee, housing, and population growth forecasts. The Project Description updates should be provided to local school boards on a timely basis to assist in their planning to accommodate growth. The Study recommends the establishment of a CSR Program with a stream focused on education and a PSM Program with the MSB, academic partners, and local/regional service providers participating.

The PRT for the Revised Final Report recommends that further study of the potential effects of the Project on vulnerable students be undertaken as part of developing the CSR and PSM programs.

The ability of youths to take advantage of Project-related career opportunities can be constrained by deficiencies in basic skills (e.g., literacy, numeracy). The Economic Development Study on Youth and Peer Review identify opportunities to maximize youth workforce development. The Study provides recommendations that support attracting youth to in-demand occupations and recognizes that youth opportunities for workplace integration in South Bruce and surrounding communities will continue to emerge based on economic growth and through the NWMO and/or nuclear sector in general. The recommendations are set within the context of an overarching recommendation to increase dialogue and collaboration between the MSB, youth-serving organizations, and educators to respond to youth issues and priorities.

The PRT for the Revised Final Report recommends that the initiatives involving youth workforce development be connected to the CSR and PSM programs to improve basic skills, including literacy and numeracy.

3. *Targeted analysis of the potential effects on farmers*

Although the Radiation Safety Institute of Canada has concluded that actual safety risk is minimal, the perception of risk may affect farmers. Concerns about stigma and its impact on business and community character will need to be addressed.

The Agriculture Business Impact Study recommended developing economic opportunities and mitigation options. These include monitoring programs for commodity safety, property values, and commodity values to address potential negative effects. Further recommendations target the development of economic opportunities and programs related to agritech innovation, agriculture awareness, and agritourism and the necessary infrastructure to address the Project's potential effects on farming operations.

The Economic Development Study on Youth identifies strategies to attract youth to the agriculture sector in the areas of education and training, innovation and technology, investment, and promotion.

The PRT for the Vulnerable Populations and Social Programs Revised Final Report recommends that further consultations with agriculture stakeholders and further analysis of economic development and mitigation options be undertaken and that the results be considered in developing the CSR and PSM programs.

4. *Potential effects on culturally/linguistically diverse groups who will likely become part of the South Bruce community*

Knowledge holders consulted for the Vulnerable Populations and Social Programs Studies identified culturally/linguistically diverse groups as a vulnerable group, referring to a challenge for service providers in the area to provide culturally appropriate services.

The Economic Development Study on Youth identifies Diversity, Equity, and Inclusion as a central priority of South Bruce youth. Youth identified that South Bruce needs to be progressive, welcoming to diverse populations, and provide services and supports that address mental health and well-being. The Study concludes that the MSB could lead initiatives to support a welcoming community and inclusion of all populations reflected in the decision-making. The NWMO could demonstrate its commitment over the long term to foster a positive workplace culture for youth through employee engagement events, health and wellness programs, and creating a sense of unity and camaraderie among employees. Education partners play an essential role in implementing on-going programs and information sessions to create inclusive environments not only at schools but in preparing students for a diverse community.

The Local Economic Development Study and Strategy provides recommendations to revitalize the community to embrace diversity in business and culture.

The Vulnerable Populations and Social Programs Revised Final Report does not identify culturally/linguistically diverse groups as a key vulnerable group. The PRT recommends further study of the potential effects of the Project on culturally/linguistically diverse groups and development of opportunities to address diversity, equity, and inclusion.

5. *Illustration of interrelations between sources of potential effects and vulnerable populations benefitting from social programs/services*

The identification of interrelations between sources of potential Project effects (e.g., workforce size, wages, and transport; reduced housing affordability/availability; increased pressure on social programs/services) and vulnerable populations and social programs/services helps to ensure that potential effects are not overlooked or not sufficiently addressed.

Currently, the community studies do not illustrate the interrelations between the sources of potential Project effects and the vulnerable populations and available social programs/services in a consistent or comprehensive manner.

The PRT recommends further assessment of the interrelations for use in the design and implementation of the PSM Program.

6. *Project effects within temporal boundaries*

Ordering potential effects by Project phase provides for improved development of options to mitigate negative effects and enhance positive effects.

The metroeconomics report forecasts the population, employment, housing, and economic growth for each of the Project phases. Baseline and Project-driven growth resulting in increased infrastructure, roads, traffic management, housing, and Project-related hiring requirements are identified for each Project phase.

The Local Traffic Effects Study provides a limited view of the traffic impacts for each phase, while the Infrastructure Baseline and Feasibility Study and the Aggregate Resources Study identify the needs of the Project during each Project phase.

Recommendations to develop the required growth/expansion plans are made and described in a number of community studies. A consolidated summary and assessment of the effects within each of the Project's temporal boundaries is recommended for development of the growth/expansion plans.

The Vulnerable Populations and Social Programs Studies Revised Final Report does not clearly order the potential effects by Project phase.

The PRT recommends that the Project's potential effects on vulnerable populations and social programs/services be ordered by phase as part of further detailed assessment.

7. *Potential for increased cost of living*

An increase in the cost of living is felt more harshly by vulnerable populations and may result in increasing the size of vulnerable populations and recourse to social programs/services.

The potential effects of the Project on the cost of living require further examination. The Project will lead to an influx of workers attracted by higher-paying jobs, which could exacerbate housing affordability/availability and other issues. In addition, the expectation (or even speculation) that workers and their families will be concentrated in South Bruce could lead to an increase in the cost of living in the area.

Further study is recommended to better understand the potential of the Project to increase the cost of living.

8. *Potential for increased gender-based violence*

The potential for a contingent of non-resident workers composed mostly of men to exacerbate gender-based violence has been established in the literature.

The potential effects of the Project on gender-based violence require further examination, since gender-based violence has been identified as an existing issue in the area and some of the relevant characteristics of the Project workforce are currently undefined.

Further study of the potential of the Project to exacerbate a range of existing social issues, including gender-based violence, is recommended when more clarity is obtained on the relevant characteristics of the workforce (e.g., origin, living and transport arrangements).

9. *Potential effects on small businesses as per Local Hiring Effects Study and Strategy*

The expected attraction of local workers to the Project's high-paying jobs could lead to vacancies in lower-paying jobs in certain small businesses (e.g., food and beverage services, accommodations, retail), leading to the recruitment of new workers, potentially from the surrounding region. Those availing of lower-paying jobs may face the increased cost of living that can be expected from the Project, putting them in a situation of vulnerability.

The Local Hiring Effects Study and Strategy identifies that the key to success includes meeting the labour needs of local employers for continued economic competitiveness and business growth. The Study focuses on strategy to maximize local employment associated with the Project, while ensuring that the community has a sufficient skilled workforce to meet the on-going labour force needs of local businesses. The Study provides action plans for creating strong local talent and developing an environment of business growth and talent retention.

The Housing Needs and Demand Analysis Study identifies the need for affordable housing and for housing that satisfies the aspirations of Project workers and their families. In the Local Hiring Effects Study, the strategic direction “Market the Community for Talent Attraction” identifies the need for South Bruce to revitalize the community.

The development of a comprehensive monitoring and reporting program is recommended to manage the effects of the Project on small businesses. The program should be prepared to detail the approach/protocol for implementing performance measures and for the measurement of success beyond effort.

The PRT for the Revised Final Report recommends that the monitoring program for small businesses be coordinated with the PSM Program.

10. Managing issues resulting from the rotational and daily transport of non-resident workers

Policies addressing non-resident workers, notably their rotational and daily transport, can influence the degree of the Project’s potential effects on vulnerable populations.

The Workforce Development Study identifies that the Regional Study Area has good potential to meet the needs of the Project, with the exception of the mining sector. Although significant rates of skilled workers will retire, the educational institutions within the Regional Study Area are producing significant numbers of graduates in science, technology, engineering, and math (STEM). The Local Hiring Effects Study and Strategy concludes that the means to minimizing rotational and daily transport of workers is community revitalization and a successful housing plan. The Workforce Development Study identifies a campus concept to incubate and cultivate workers to settle in the Core Study Area.

Further study of the potential effects of the rates of rotational and daily transport of workers on the community is recommended.

11. Supportive housing during the construction phase of the Project

Housing of vulnerable persons may become an issue as early as pre-construction, as speculation of the influx of workers and families may increase the costs of housing for rent or purchase. Renters can be particularly vulnerable to increased costs or eviction in favour of workers who can pay more.

The Housing Needs and Demand Analysis Study recommends the preparation of a housing plan.

The Vulnerable Populations and Social Programs Revised Final Report does not sufficiently address supportive housing during the construction phase. The PRT recommends that supportive housing during construction be a component of the housing plan.

12. Assumption of the availability of a skilled regional workforce resulting in a small increase in population, thereby not adding significant pressure to existing social programs/services

An increase in the population would presumably result in increased pressure on existing social programs/services.

The community studies provide a number of strategies and recommendations to attract workers and their families to the MSB.

The Workforce Development Study provides an Incubate and Cultivate strategy to attract skilled labour to the community.

The Local Hiring Effects Study and Strategy identifies the need to revitalize the community to attract workers for local businesses and the Project to the community.

The Housing Needs and Demand Analysis Study identifies the need for affordable housing and for housing that satisfies the aspirations of Project workers and their families.

The rationale for the assumption stated in the Vulnerable Populations and Social Programs Studies Revised Final Report that there will be only a small increase in Project-related population growth, thereby not adding significant pressure to existing social programs/services, needs to be further assessed for its validity.

4.2 Comments on Adherence to the Work Plans

The Vulnerable Populations and Social Programs Studies generally comply with their approved Work Plans as indicated in **Table 4.1**. Compliance is considered to be partial for some aspects of the Work Plans, as explained in **Appendix C**.

Table 4.1 Adherence to the Work Plans

Step #	Step	Description of Activities	Comments from Peer Review
Step 1	Data Collection – Secondary/Primary, updated Project assumptions, information from other related community studies	<p>Vulnerable Populations Study</p> <p>a. Define the vulnerable populations:</p> <ul style="list-style-type: none"> • Identify vulnerable community member groups for assessment (e.g., low-income population, individuals with physical and cognitive disabilities, populations with language and literacy barriers, elderly population, children, groups that are isolated culturally, geographically or socially (e.g., the Mennonite community), individuals suffering from mental illness, population affected by chronic health conditions). • Describe why these groups are considered vulnerable in comparison to others in South Bruce and the region. <p>b. Resource review</p> <ul style="list-style-type: none"> • Carry out a review of South Bruce and region relevant documents and data sets that support collection of information required. <p>c. Conduct interviews with key knowledge holders</p> <ul style="list-style-type: none"> • Create data collection tools that support the collection of information regarding current programs and services and program barriers. • Based on the preliminary definition/list of vulnerable groups, identify key knowledge holders for engagement (individual or group interviews). • Knowledge holders will include representatives from: <ul style="list-style-type: none"> ○ Grey Bruce Public Health ○ Bruce County Human Services Department ○ Bruce County Health Services Department ○ Huron Perth Public Health 	In general, Steps 1a-c have been satisfactorily addressed.

Step #	Step	Description of Activities	Comments from Peer Review
		<p>Social Programs Study</p> <p>a. Carry out a review of documents and data sets that provide information on:</p> <ul style="list-style-type: none"> • Children’s programs • Programs for adults, seniors and families • Other support services <p>b. Undertake interviews with key knowledge holders.</p> <p>c. Identify the children’s programs, programs for adults, seniors and families, and other support services currently available.</p>	<p>In general, Steps 1a-c have been satisfactorily addressed.</p>
Step 2	Provide inputs to and take outputs from other studies	<p>a. Share data and findings with other community studies.</p> <p>b. Take into considerations data and findings from other studies that are pertinent to the subject study.</p>	<p>In general, Step 2a has been satisfactorily addressed. Step 2b has been partially addressed, as per the relevant peer review comments in Appendix C (e.g., 2a, 2i).</p>
Step 3	Analysis and assessment, identification of effects management options	<p>Vulnerable Populations Study</p> <p>a. Create an inventory</p> <ul style="list-style-type: none"> • Identify the programs and services currently available to / planned for each of the defined vulnerable groups. <p>b. Define program barriers</p> <ul style="list-style-type: none"> • Based on the inventory, identify and describe any non-financial limitations (e.g., program space) experienced by the programs and services available to / planned for the vulnerable groups. <p>c. Assess the potential Project effects</p> <ul style="list-style-type: none"> • Identify and explain any potential Project effects on the current programs and services available to /planned for the vulnerable groups (e.g., increase in costs). <p>d. Develop potential effects management options based on the identified potential Project effects; options could include mitigation/enhancement measures, management options or other possibilities.</p> <p>Social Programs Study</p> <p>a. Identify projected population increases and demographics changes as a result of the Project and identify changes in populations that would be using social programs.</p> <p>b. Identify and explain any potential Project effects (positive and negative) on social programs and services.</p> <p>c. Based on the analysed findings, develop potential options to sustain social programs and services; options could include mitigation/enhancement measures, management options or other possibilities.</p>	<p>Steps 3a to 3d have been partially addressed, as per the relevant peer review comments in Appendix C (e.g., 2b, 2c, 2i).</p> <p>Steps 3a to 3c have been partially addressed, as per the relevant peer review comments in Appendix C (e.g., 2b, 2c, 2i).</p>

Step #	Step	Description of Activities	Comments from Peer Review
Step 4	Observations and conclusions	a. Summarise findings. b. Set out observations and conclusions.	In general, Steps 4a and 4b have been satisfactorily addressed.

4.3 Municipality of South Bruce's Guiding Principles

The Vulnerable Populations and Social Programs Studies inform select principles of the 36 Guiding Principles established by the MSB. The MSB 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, the 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 the 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 Vulnerable Populations and Social Programs Studies: numbers 10, 16, and 32. **Table 4.2** lists the principles and how the Vulnerable Populations and Social Programs Studies inform them.

Table 4.2 The Principles Associated with the Vulnerable Populations and Social Programs Studies

Principle # and Description	Consideration of the Principle in the Study
<p>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.</p>	<p>Options 1, 3 and 4 in particular align with the MSB Guiding Principle #10, as listed sequentially below:</p> <ul style="list-style-type: none"> – The NWMO creates a strategic and responsive CSR Program with a vulnerable populations and social programs and services stream. – The NWMO, in collaboration with the MSB, could create temporary accommodations for workers/contractors as part of the potential 'campus concept' that could ultimately be converted to supportive housing upon completion of the construction phase. – The NWMO, potentially in partnership with the MSB or others, creates a Child Care Centre in the Centre of Expertise that would provide much needed additional child care spaces in the Study Area. <p>The Revised Final Report specifies that "the options put forward cannot be the sole responsibility of the NWMO, but rather, require partnerships with the MSB and other local/regional organizations to implement."</p>
<p>16. The NWMO will implement the Project in a manner that promotes diversity, equality and inclusion.</p>	<p>Options 1 and 2 in particular align with the MSB Guiding Principle #16, as listed sequentially below:</p> <ul style="list-style-type: none"> – The NWMO creates a strategic and responsive CSR Program with a vulnerable populations and social programs and services stream. – The NWMO creates a PSM Program with the MSB, local and regional social service providers, representatives from academic/training institutions and persons with lived experience. <p>The Revised Final Report specifies that "the options put forward cannot be the sole responsibility of the NWMO, but rather, require partnerships with the MSB and other local/regional organizations to implement."</p>
<p>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.</p>	<p>Options 1, 3 and 4 in particular align with the MSB Guiding Principle #32, as listed sequentially below:</p> <ul style="list-style-type: none"> – The NWMO creates a strategic and responsive CSR Program with a vulnerable populations and social programs and services stream. – The NWMO, in collaboration with the MSB, could create temporary accommodations for workers/contractors as part of the potential 'campus concept' that could ultimately be converted to supportive housing upon completion of the construction phase. – The NWMO, potentially in partnership with the MSB or others, creates a Child Care Centre in the Centre of Expertise that would provide much needed additional child care spaces in the Study Area. <p>The Revised Final Report specifies that "the options put forward cannot be the sole responsibility of the NWMO, but rather, require partnerships with the MSB and other local/regional organizations to implement."</p>

4.4 Conclusions of the Peer Review

The overall objectives of the Vulnerable Populations and Social Programs Studies are to identify the vulnerable populations in the MSB and surrounding region, the effects that they may feel as a result of the APM Project, and steps that could be taken to mitigate those effects, as well as to assess the effects of the APM Project on the community programs offered by Bruce County that are made available to the residents of South Bruce at the commencement of construction and of operations.

The key findings of the Revised Final Report can be summarized as follows:

- The Study Area is currently experiencing pressure in housing and social services provision (e.g., child care, mental health and addictions) as a result of Bruce Power’s MCR Project, the pandemic, and the recent influx of new residents from southern Ontario. For example, as a result of the influx of people from the Greater Toronto Hamilton Area and other parts of southern Ontario to the Study Area, housing has become largely unaffordable for low-wage households and households dependent on subsidies.
- The vulnerable populations in the Study Area determined to be at greater risk of adverse effects because of the Project and that may not benefit equally from the potential positive effects of the Project are:
 - People of low socio-economic status
 - People experiencing mental health and addictions challenges
 - Victims of domestic violence (specifically women and children)
- While there may be in-migration of workers during the construction and operations phases of the Project, the overall change in the projected population resulting from the Project in comparison to the regional baseline population growth is predicted to be relatively small. There is already an existing large and capable skilled workforce available regionally for the construction and operations phases of the Project.
- Given the overall change in population because of the Project is expected to be relatively small, it is not anticipated that the Project would result in a significant increase in pressure on vulnerable populations or on existing social programs and services in the Study Area. However, given the current challenges facing vulnerable populations and social programs, it is possible that the Project could result in some effects, albeit relatively small, on these populations and programs in relation to the current state (e.g., increasing demand on child care spaces, mental health and addictions services, library services).
- The possible benefits to vulnerable populations and social programs and services resulting from the Project include increased employment opportunities, increased pool of potential employees, increased municipal tax base and increased funds for social programs, enhanced community sustainability and a more vibrant community (increased multiculturalism and community involvement), decreased child and family services issues as a result of increase employment, increased opportunities for academic and training partnerships, future supportive housing opportunities, and enhanced telecommunications infrastructure.
- The potential negative effects of the Project on vulnerable programs and/or social programs include increased cost of living, increased divide between the ‘haves’ and ‘have nots’, decreased availability and affordability of housing, increased need for culturally appropriate services and supports that may not currently exist, increased competition for employees, increased pressure on community services and supports that are already operating at or beyond capacity, increased pressure on social programs and increased costs, lack of ability to sustain indirect and induced services, and anxiety about possible Project accidents, malfunctions or environmental contamination.
- NWMO can enhance opportunities or mitigate potential negative effects through several options put forward for consideration. The options presented reflect those effects considered most material from a Project commitment perspective. Implementation of the options will require NWMO to partner with MSB and other local/regional organizations. These include:
 - Create a CSR vulnerable population and social program and service stream to help address some of the current pressures being placed on vulnerable populations and social programs, through activities such as: partnership development with local service providers, donations to NGOs/community organizations, funding

programs for NGOS/charitable organizations to enhance supports to vulnerable populations, and scholarships

- Create of a PSM Program to identify new and innovative ways to involve key local stakeholders in the process of gathering and analysing monitoring data
- Possibly convert temporary accommodations for workers to subsidized/transitional housing for vulnerable populations (e.g., low income, seniors)
- Create a Child Care Centre in the Centre for Expertise, and/or leveraging existing local space for the purposes of child care facilities, with a percentage of spaces set aside for low-income families

The PRT concludes that the Vulnerable Populations and Social Programs Studies Revised Final Report satisfactorily addresses the objectives of the Work Plans by identifying certain potential Project effects. The PRT has, however, identified areas of further beneficial study described in this report to more fully assess the potential Project effects on a wider range of vulnerable populations and social programs/services, which would presumably lead to refining the mitigation/enhancement options and to fleshing out the PSM Program. The PRT suggests that some future studies be conducted to inform the MSB's decision about its willingness to host the Project, while others be conducted as part of a more detailed impact assessment should South Bruce be selected as the preferred location for the Project. The proposed studies would serve to address the following principal recommendations:

- Sufficiently incorporate and reconcile the relevant findings and recommendations of other community studies (and the associated peer review reports) to permit fuller analysis of the potential Project effects on vulnerable populations and social programs/services, as some of those effects are considered to be inadequately addressed. Doing so will allow for validation of key assumptions, in particular those regarding the availability of an existing large and capable regional workforce for Project construction and operations and an insignificant increase in the Project-related MSB population and cost of living.

More broadly, the PRT suggests that the future studies into the potential effects of the Project on the socio-economic environment be less piecemeal and apply suitable analytical frameworks (e.g., Gender-based Analysis Plus; Determinants of Health) that permit a more systematic and comprehensive assessment of the potential effects on vulnerable populations and social programs/services.

- Provide a focused analysis of the potential effects of the Project on vulnerable populations and/or social programs/services that are not adequately addressed. This would presumably lead to refining the mitigation/enhancement options and to fleshing out the PSM Program.

In closing, the PRT notes that the term “vulnerable populations” may stigmatize the members of groups labelled as “vulnerable” and conceal structural factors of inequity. An alternate term could be “overburdened populations,” who are disproportionately exposed to environmental and socio-economic burdens. A discussion involving the relevant stakeholders could be foreseen to decide on an appropriate term.

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	Deloitte
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 and MHBC
S16	Social Programs Study	NWMO, MSB	DPRA
S17	Emergency Services Study	NWMO	DPRA and IEC
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

March 10, 2022 – Table 1 updated October 5, 2022 (Peer Review Responses to DPRA Comments column based on DPRA Revised Final Report of September 12, 2022)

To	Dave Rushton/Catherine Simpson, Municipality of South Bruce		
Copy to			
From	Brigitte Masella, Greg Ferraro and Ian Dobrindt/AD/kf	Tel	+1 519 884 0510
Subject	Vulnerable Populations (S18) and Social Programs (S16) Studies Draft Report – Peer Review Comments	Project no.	11224152-MEM-20

1. Introduction

This memorandum provides the Municipality of South Bruce (South Bruce) Peer Review Team’s comments on the Vulnerable Populations (S18) and Social Programs (S16) Studies Draft Report (Draft Report) prepared by DPRA Canada inc. (January 31, 2022), which was supplemented by a preliminary revision of the proposed options submitted on February 15, 2022 in the form of four slides, for your consideration and internal circulation as per the South Bruce Nuclear Exploration Project Joint Study Review Flow process. In addition, this memorandum will be submitted to the Nuclear Waste Management Organization (NWMO) and their consultant (DPRA) 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 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, GHD (Subject Matter Expert (SME) and Lead Consultant) considered the following information during our review of the Draft Report:

- Southwestern Ontario Vulnerable Populations Study Work Plan (S18), prepared by DPRA Canada inc. (October 12, 2021)
- Southwestern Ontario Social Programs Study Work Plan (S16), prepared by DPRA Canada inc. (October 12, 2021)
- Knowledge Holder Interviews
- Peer Review Comments on NWMO’s Draft Project Description for South Bruce Community Studies Memorandum, prepared by GHD Limited (November 18, 2021) and responded to by NWMO (January 27, 2022)
- Observations on DPRA Canada inc.’s “Check-in #2” presentation of December 9, 2021, prepared by GHD Limited (January 3, 2022), and the follow-up discussion between GHD, DPRA and NWMO on January 5, 2022
- Housing Needs and Demand Analysis Study Report (E08), prepared by Keir Corp. (May 20, 2022)

- Labour Baseline Study Report (E09), prepared by Keir Corp. (May 5, 2022)
- Workforce Development Study Report (E10), prepared by Keir Corp. (May 5, 2022)

GHD reviewed the Draft Report with the following questions in mind:

- Are there any significant concerns with, issues about, and/or omissions in 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?

GHD’s Lead Consultant and SME held an internal 10-day Peer Review Check-In Meeting working through the preceding questions. Following this, we shared our initial observations/preliminary comments with NWMO and their consultant during discussions on February 15 and March 14, 2022, where questions were asked, clarifications were sought, and suggestions were offered. Following this discussion, our substantive comments were finalized as listed in the Comment Disposition Table (**Table 1**).

3. Peer Review Comments

As stated, the Comment Disposition Table (**Table 1**) lists our substantive comments on the Draft Report. We understand that NWMO and their consultant will provide responses to these comments and address them as part of finalizing the Report. **Attachment 1** lists comments noted as less important to the fundamental purpose of the peer review for NWMO’s consideration.

In general, we conclude that the Draft Report fulfils the objectives of the Work Plans that involve identifying/describing the vulnerable populations and social programs/services by providing a relatively good description of baseline conditions. We find, however, that the Draft Report only partially fulfils the objectives that involve identifying and assessing the potential effects of the APM Project and developing options to address those effects: the Draft Report generally provides a high-level assessment of potential effects and certain general options to address those effects.

While we recognize that the current effects assessment process is not the formal impact assessment process, we have identified a lack of traceability in the data analyses, notably between the effects assessment and the options development. We suggest that, in order to improve upon the logical flow of information, Section 5 should end with a tabulation or list of the potential negative and positive effects and Section 6 address those effects in a systematic fashion in proposing options for mitigating negative effects and enhancing positive effects. Using this approach, the net effects of the APM Project can be more clearly communicated to the reader. At present, this is not undertaken consistently in a traceable manner nor communicated clearly. For example, some of the potential negative effects in Section 5 are carried forward into Section 6, but others are not, with no explanation given.

During the above-cited February 15, 2022 meeting, GHD commented on the statement in the Draft Report that there is a large and skilled workforce available regionally for construction and operations (resulting in a relatively small “overall change” in the population) that rests on the assumption that the timeline for the completion of the MCR Project will be harmonized with the timeline for the construction of the APM Project. Our comment was that it is common for the timelines of large projects to shift (e.g., delays in the formal impact assessment) and that the analyses and conclusions of the report could presumably be affected if that assumption does not hold true. For example, the size of the contingent of non-resident workers, as well their

lodging and commuting arrangements, shift rotations and other matters, will influence the assessment of the potential effects of that particular workforce on vulnerable populations.

It was decided in the February 15, 2022 meeting that the assumption, which is also relevant to other Community Studies, is reasonable based on best available information at this time. We recognize the challenge in predicting the availability of a large and skilled workforce in the region. We understand that a statement to this effect will be included in the final report, as well as in the other Community Study Reports as applicable. Therefore, this comment is not included in **Table 1**.

Table 1 *Vulnerable Populations and Social Programs Studies Draft Report Comment Disposition Table*

Comment Number	Report Section Reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Responses to DPRA Comments
1		The Draft Report is not currently clear about measures to involve members of vulnerable groups or of groups that avail of social programs as part of mitigating or enhancing the potential effects of the APM Project on them. More clarity could be provided in that regard, by addressing for example the following recommendations:	<ul style="list-style-type: none"> – As per the SOW and work plan, there was no intent to engagement with vulnerable populations at this point in the process (community studies; this can occur in future studies, if the South Bruce Area is ultimately selected as the Project location. Text will be added to clarify this point in the study. 	The peer review comment focused on the involvement of members of vulnerable groups or of groups that avail of social programs in the options to mitigate or enhance potential effects. Peer review responses to DPRA comments on specific peer review comments provided in Rows 1a to 1d.
1a	2.2.1	Explain on what basis the knowledge holders were selected, as well as how and when other knowledge holders, such as members of vulnerable groups and of groups that avail of social programs, will be consulted.	<ul style="list-style-type: none"> – Additional text will be added to reflect the fact that: (1) the Knowledge Holders were selected based on their knowledge and experience regarding vulnerable populations and social programs; (2) in some instances those Knowledge Holders contacted referred NWMO to someone more suited to address the questions; (3) Subsequently an interview was completed with Huron Perth Public Health, which will be reflected in the revised report. – As per the SOW and work plan, there was no intent to engage directly with vulnerable populations or individuals. Text will be added to clarify this point in the study report; as per above, additional engagement can occur in future studies if the Project is located in the South Bruce Area). 	Comment satisfactorily addressed.
1b	Table 18	Consider community engagement measures aimed at improving the determination of mitigation and enhancement measures during the Environmental and Social Impact Assessment as part of the options assessment. (The following statement illustrates the importance of engaging the community in that respect: “Approaches to service-related decision-making, which incorporate input from individuals with	<ul style="list-style-type: none"> – As per the response to comment 20 below, and as discussed on Feb 15, Table 18 will be removed. – For the purposes of the VPSP study, ‘individuals with lived experience’ are defined as members of vulnerable populations and/or individuals who have participated in, or are the target population of, social programs. – In Section 6 of the revised report ‘Corporate Social Responsibility (CSR) 	Comment satisfactorily addressed.

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		lived experience, are desired to enhance the effectiveness of strategies to systematically address addictions and substance abuse issues” (Section 3.3.3, last paragraph)).	<p>Program with a stream focused on vulnerable populations and social programs/services’ (slide # 3 from February 15 meeting with the PRT) will be expanded to include an existing/new lived experience group that assists NWMO/MSB with the identification of target supports that could be provided. [Support would be required from local stakeholders to identify and/or help establish this group]</p> <ul style="list-style-type: none"> - In addition, in Section 6 of the revised report, consistent with the description of the ‘Participatory Social Monitoring Program’ slide # 4 from February 15 meeting with the PRT) in the Final <i>Local Regional Education Study</i> report (July 2022), an existing/ new lived experience group may participate in the Program. Participants would guide the collection and analysis of social monitoring data and support the development of strategic plans to identify and mitigate Project-related effects and to strengthen Project benefits. The Program would also contribute to understanding potential future streams for the CSR program. Information from this Program could be an input to a future impact assessment if the Project is located in the South Bruce Area. 	
1c	Slide 3	Clarify whether members of vulnerable groups and of groups that avail of social programs would be involved in the actual work of the proposed stream.	<ul style="list-style-type: none"> - See 1b. 	Comment satisfactorily addressed. [Slides removed from Final Draft Report.]
1d	Slide 4	Clarify whether members of vulnerable groups and of groups that avail of social programs would be involved in the actual work of the Participatory Social Monitoring Program.	<ul style="list-style-type: none"> - As stated in response to 1b above, in Section 6 of the revised report, consistent with the description of the ‘Participatory Social Monitoring Program’ slide # 4 from February 15 meeting with the PRT) in the Final 	Comment satisfactorily addressed. [Slides removed from Final Draft Report.]

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			<i>Local Regional Education Study</i> report (July 2022), an existing/ new lived experience group may participate in the Program.	
2		The traceability of the data in the analyses is in some cases lacking (e.g., relaying of baseline data to the effects assessment and relaying of effects assessment results to the options development). In cases where some data no longer need to be carried further in the analysis, the report should make that clear. The traceability of the data could be improved, by addressing for example the following recommendations:	<ul style="list-style-type: none"> - Text to be added that explains that information related to those populations not considered more vulnerable as a result of the Project will no longer be discussed. 	Peer review responses to DPRA comments on specific peer review comments provided in Rows 2a to 2u.
2a	3.1	Explain why some of the impacts of the influx of new residents since the start of the pandemic identified do not seem to be covered further in the report (e.g., capacities of schools).	<ul style="list-style-type: none"> - This is addressed in Section 4.0 and 5.0. Again, the goal of Section 3.0 is to present the baseline findings. - Capacities of the schools was not identified as an issue by VP/SP Knowledge Holders. - Education (K-12) is the focus of the Local/Regional Education Community Study Report, which was not complete when the V1 draft VP/SP report was submitted in January 2022. - Text will be added to the revised report, referring the readers to the final version of the <i>Local/Regional Education Study</i> Report (DPRA July 15, 2022). 	<p>Comment partially addressed.</p> <p>The Final Draft Report states that potential positive and negative effects of the Project were identified by knowledge holders and DPRA as subject matter experts. DPRA's Local/Regional Education Study notes that knowledge holders consulted for that study identified the responsibility of the school boards for inclusion of vulnerable students as an operational consideration that may "influence" the Project's effects. According to said study, knowledge holders identified potential effects, including pressure for school boards to respond to "community expectations for accommodation."</p> <p>The Local/Regional Education Study recommends that the NWMO provide timely Project description updates that include employee, housing, and population growth forecasts. Said study also recommends establishing a CSR Program with a stream on education and a PSM Program with MSB, academic partners, and local/regional service providers.</p>

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				Further study of the potential effects of the Project on vulnerable students as part of developing the CSR and PSM programs is recommended should South Bruce be selected as the preferred location for the Project.
2b	3.2	List all the vulnerable groups identified by the knowledge holders interviewed, such as farmers.	– Will include farmers in the text of 3.2	<p>Comment partially addressed.</p> <p>A reference to farmers in the list of groups who may be vulnerable to the Project's effects, as identified by knowledge holders (Section 3.2, second paragraph) of the Final Draft Report, was not found, even though that group had been specifically identified.</p> <p>A reference is made to “[c]oncerns about potential accidents/contamination and/or increased cost of living [that] may be experienced by some farmers in the area” when describing one of the three “populations considered more vulnerable due to the Project” (i.e., “People experiencing mental health and/or addictions challenges”) in Table 3 (Vulnerable Groups within the Context of the APM).</p> <p>In Section 3.2.2.1 (key statistics on individuals experiencing mental health and/or addictions issues), it is noted that “[f]armers have been known to encounter a variety of psychosocial risks and stressors and potentially greater mental health problems...”</p> <p>In Section 5.2 (Potential Negative Project Effects), the potential effects of concerns about potential accidents/leaks on the mental health of farmers are reiterated.</p> <p>In Section 6 (Options Assessment), Option 1 involves creating a CSR program stream for vulnerable populations and social programs/services, including those involving mental health. More specifically, Option 1 involves: NWMO participation in</p>

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				<p>working groups and the like that address social issues, donations, and sponsorships.</p> <p>The Agriculture Business Impact Study notes in the subsection “Local Support for Agriculture” that “[s]takeholders expressed a passionate desire to see the South Bruce farming way of life understood, respected, and reintegrated into the rest of the economy and the community.”</p> <p>Section 3 of that study raises several concerns of farmers (e.g., “availability of workforce, if higher-paying low-skilled jobs become available because of the Project”; traffic disruptions; disruption of agricultural character of the community; perception of contamination of produce). The potential effects of the Project on the agricultural industry could create or exacerbate the vulnerability and mental health of workers in the industry due to the concerns raised.</p> <p>As per the Agriculture Business Impact Study, further consultations with agriculture stakeholders and further development of mitigation options to address the Project’s potential negative effects are recommended to inform the decision about willingness to host the Project. Doing so will assist in further developing the CSR and PSM programs.</p>
2c	3.2	<p>Explain why some vulnerable groups identified are not seemingly included in Table 3 and/or addressed only superficially in the analysis of potential effects (e.g., LGBTQ2S+ community; newcomers and culturally/linguistically diverse groups). Where an explanation is already provided, document it with references (e.g., Mennonites).</p> <p>This recommendation is tied to the identification of four “key vulnerable population groups” in Section 3.3.2 (first</p>	<ul style="list-style-type: none"> – As is done in the case of Mennonite population, a rationale for why other groups were not considered more vulnerable/benefit less from the Project will be added. – Rationale for selection of VPs identified in Section 3.3.2 is provided at the start of Section 3.2 and in Table 3. If required, this can be repeated in Section 3.3.2. 	<p>Comment not addressed.</p> <p>Peer review comment focused on why certain vulnerable groups identified by knowledge holders were not seemingly included in Table 3 (which lists “those populations considered more vulnerable due to the Project”) and/or addressed only superficially in the analysis of potential effects. In other words, on what basis were they not included in the first paragraph of Section 3.3.2, which refers to existing strategies/partnerships and</p>

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		paragraph); on what basis were they selected?		<p>service areas for each of the “key vulnerable population groups.”</p> <p>For example, culturally/linguistically diverse groups, identified by knowledge holders (one of whom referred to a challenge for all service providers in the area to provide culturally appropriate services), are not identified as a key vulnerable group, although Section 5.2 (Potential Negative Project Effects) refers to the need to provide “culturally appropriate services and supports that may not currently exist” (Section 5.1 (Potential Positive Project Effects) notes that a potential benefit is an increase in multiculturalism).</p> <p>The options presented in Section 6 to mitigate/enhance negative/positive effects do not refer specifically to culturally/linguistically diverse groups.</p> <p>According to the Local Hiring Effects Study and Strategy, 98% of South Bruce’s population is white and the lack of ethnic and racial diversity represents a risk. Said study/strategy notes that a desired result is a “[s]tronger focus on immigrant attraction and supports to enable settlement and integration into the community and labour market.” According to the Economic Development Study on Youth, cultural diversity is a key factor that would incentivize youths to stay in or relocate to South Bruce. That study noted that Diversity, Equity, and Inclusion is a priority for youths.</p> <p>Further study of the potential effects of the Project on vulnerable populations identified by knowledge holders but excluded from the “key vulnerable population groups” and not sufficiently addressed in other community studies, including culturally/linguistically diverse groups, is recommended. It could be done</p>

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				as part of a more detailed impact assessment should South Bruce be selected as the preferred location for the Project.
2d	4	List the principal sources of the potential effects of the APM Project on the socio-economic environment and identify which could affect vulnerable groups and groups that avail of social programs prior to determining which project characteristics are relevant to the effects assessment.	<ul style="list-style-type: none"> - In the revised report, we are further refining Section 4 to update with more recent information not available at the time the V1 draft was submitted in January 2022 (e.g., metroeconomics growth expectations February 2022 for base/impact cases, May 2022 final <i>Housing Needs and Demand Assessment</i> and <i>Workforce Development</i> findings). Section 5 assessment will also be revisited to identify Project elements that may potentially affect Vulnerable Populations/Social Programs. - As noted above, the focus of the study is on effects on programs and services and VPs, not the larger/broader socio-economic environment as whole. - With metroeconomics growth expectations prepared for MSB, the relative impact of the Project on population is marginally less than was the case in the V1 draft (i.e., the population growth without the Project is greater than was projected by the two counties' forecasts) 	<p>Comment partially addressed.</p> <p>The wages to be paid to the Project workforce are a source of potential effects on vulnerable groups. Section 4 refers to wages for the pre-construction workforce, but not for the construction and operations workforce. The age of the workforce available regionally/locally would also be a relevant characteristic to address (e.g., it may have implications for the need to source non-resident workers, whose presence could potentially affect vulnerable groups). The Local Hiring Effects Study and Strategy refers to possible labour force shortages due to retirements.</p> <p>Fuller illustration of the interrelations between sources of potential effects on the one hand and vulnerable groups and/or groups that avail of social programs on the other would help to ensure that potential effects are not overlooked or not sufficiently addressed. This could be done as part of a more detailed impact assessment should South Bruce be selected as the preferred location for the Project.</p>
2e	Figures 3 and 4	Validate that each of the pathways identified has been explained (e.g., how demographic change can lead to social cohesion; how the APM Project will lead directly to a lack of start-up capital for child care) and specify whether/how each relates to vulnerable groups or groups that avail of social programs (e.g., decreased traffic safety).	<ul style="list-style-type: none"> - Figures 3 and 4 will be removed. - The changes will be identified and discussed in relation to materiality. - Changes identified by Knowledge Holders but not germane to the Project, will be noted but an explanation added as why they are not being carried forward to the options. 	Comment satisfactorily addressed.
2f	Figures 3 and 4	Validate that all the cause-and-effect relationships described in the Draft Report	<ul style="list-style-type: none"> - See 2e 	Comment satisfactorily addressed.

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		are reflected in the figures (e.g., relationship between increased cost of living and difficulty in finding housing).		
2g	Figures 3 and 4	Section 5 notes that the figures illustrate the potential direct and indirect negative effects of the APM Project in the context of vulnerable populations and social programs, based on information provided by knowledge holders and DPRA's knowledge and experience. We recommend validating that the figures illustrate potential pathways as per information from the knowledge holders and per the general scientific literature (e.g., "increased pressure on existing rural services/supports and care providers" would presumably lead to more effects than pressure on after-school programming and digital library services).	– See 2e	Comment satisfactorily addressed.
2h	5	Order the potential effects by project phase as per the temporal boundaries identified in Section 1.3.3.	– DPRA will describe this in the context of programs and services and the relative differences in Project effects during the pre-construction, construction and operations periods. It is noted that the relative effects in pre-construction are less, but this first phase in an opportunity to understand potential effects in practice and to initiate the options described in Section 6.	Comment partially addressed. Section 5.2 notes that: "The potential negative effects may occur throughout the Pre-Construction, Construction, and Operations phases of the Project, while becoming more pronounced as the Project progresses (as a result of cumulative population growth and maturation of initiatives associated with the Project)." That statement is confusing: on the one hand, it seems to suggest that the potential negative effects may worsen with time, while on the other it seems to suggest the opposite in referring to the "maturation of initiatives" (assumed to be mitigation measures). We recommend classifying the Project's potential effects by Project phase to inform the decision about willingness to host the Project.
2i	5	Explain why the potential effects of a contingent of non-resident construction workers composed mostly of men (e.g.,	– As noted in Section 4 (and further articulated in revisions to Section 4 in the revised report) it is anticipated that	Comment partially addressed. Number of Workers:

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		<p>miners) are not explicitly addressed in the effects assessment, particularly in the context of the statement that "...it is likely that any additional population growth may add further pressure to [the] existing socio-economic environment" (Section 5, first paragraph).</p> <p>We also recommend that such an explanation take into account not only the estimated number of non-resident workers, but also their expected spending power, which could affect the cost of living. In addition, the explanation could consider the potential for a contingent of non-resident workers composed mostly of men to exacerbate a range of existing issues that have been identified, including gender-based violence. Figure 4 shows only a decrease in social cohesion as an effect of "more transient people not invested in the community."</p>	<p>the majority of construction workers may be comprised of labour from the Regional/Local study area, including Bruce Power MCR Project workers who may transition to the NWMO Project upon completion of the MCR Project.</p> <ul style="list-style-type: none"> - Additional information from the <i>Workforce Development Study</i> (Keir Corp, May 2022) re: numbers of non-resident workers, the sources/size of workforce for underground operations (e.g., Section 3.4.3/ Section 5.3 p. 55) will be added, including identified measures to train local/regional residents for these skills. This topic can be further explored in a future study/during the Impact Assessment process if the Project is located in the South Bruce Area, when there may be a better understanding of where the workforce for underground operations may come from. - As noted in Section 5, with respect to "additional growth", it anticipated that the overall change in population from the Project relative to the regional baseline population is relatively small, as illustrated by the metroeconomics projections (February 2022) prepared for MSB. Section 5 assessment will also be revisited to identify Project elements that may potentially affect Vulnerable Populations/Social Programs. - Increased cost of living is identified throughout the report as a key factor. However, given the relatively small change in population as a result of the Project, it is not likely that the Project will result in material/ further increases in cost of living. This is a current challenge being experienced by VPs as a result of the MCR Project, the 	<p>The peer review report for the Workforce Development Study notes that: "with the information presented the wind down in activity to the MCR Project at the Bruce Nuclear Generating Station will not significantly enhance the labour pool in the Region because of what the Building Trade Halls have stated. These Halls have indicated that there will be a high rate of member retirements over the next decade, which will reduce the labour force numbers available for the NWMO Project in 2033 (anticipated construction start). Further assessment of this potential could be carried out to better understand and develop this opportunity." Said peer review report also finds the discussion of the workforce required for below-ground operations to be general.</p> <p>The Local Hiring Effects Study and Strategy refers to the challenges of South Bruce in attracting "a working-age population with the skills necessary to participate in the evolving labour market." The Final Draft Report does not address the findings in said study/strategy (it only refers the reader to it for a discussion of the vulnerability of small business owners).</p> <p>The assumption, therefore, that "there is a large and capable skilled workforce available regionally for the construction and operations phases of the Project" (Section 4.2) may be challenged. Further study of the availability of workers regionally/locally as part of a more detailed impact assessment is recommended should South Bruce be selected as the preferred location for the Project.</p> <p>We note that, in Section 5, a potential effect raised by knowledge holders about the Project leading to more "transient workers not invested in the communities"</p>

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			<p>pandemic, and other factors. This topic is not being explored any further in a community study – this could be explored in a future study / during the Impact Assessment process if the Project is located in the South Bruce Area.</p> <ul style="list-style-type: none"> <li data-bbox="1037 435 1488 760">– None of Knowledge Holders stated that the increase in domestic violence was the result of transient workers employed by Bruce Power for the MCR Project. The only mention of domestic violence was in the context of social isolation due to the pandemic. As discussed in the meeting with the peer review team, Figure 4 will be deleted. Additional text on domestic violence/gender-based violence will be added to Section 5. <li data-bbox="1037 776 1488 906">– As discussed previously, in Southwestern Ontario, the workforce will not be housed in a large camp setting. This will be reiterated in the report. 	<p>has been deleted from the Final Draft Report.</p> <p>Spending Power of Workers:</p> <p>Section 5.2 notes that potential negative effects identified include an increase in the cost of living due to a greater number of higher-paying jobs, which could exacerbate housing affordability/availability and other issues.</p> <p>Section 5.3 posits that potential effects identified by knowledge holders “may not be applicable/fully applicable to the Project (e.g., because there is already a large and capable skilled workforce available regionally for the Project’s construction and operations phases, it is unlikely that the cost of living will increase significantly due to an influx of new workers taking on higher paying jobs).”</p> <p>We find that assumption to be insufficiently documented (particularly in the current context of unfavourable economic dynamics). For example, a sustained analysis of existing or future wages in the area, with or without the Project, and on price indices is lacking. In addition, the expectation (or even speculation) that workers and their families will be concentrated in South Bruce could lead to an increase in the cost of living in that area.</p> <p>We believe that the potential effects of the Project on the cost of living are not currently known and that it is not currently possible to presume that they will be negligible.</p> <p>Further study of the potential effects of the Project on the cost of living is recommended as part of a more detailed impact assessment should South Bruce be selected as the preferred location for the Project.</p>

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				<p>Gender-based Violence:</p> <p>The text on gender-based violence to be added in Section 5 was not found.</p> <p>Further study of the potential for a contingent of non-resident workers composed mostly of men to exacerbate a range of existing issues that have been identified in the area, including gender-based violence, is recommended when more clarity is obtained on the relevant characteristics of the workforce. This could be done in the context of a more detailed impact assessment should South Bruce be selected as the preferred location for the Project.</p>
2j	5 and 6	Distinguish between direct and indirect effects by defining each term.	– Definitions to be added	<p>Comment satisfactorily addressed.</p> <p>Definitions between direct and indirect effects were not found, though Figures 3 and 4, which referred to potential direct and indirect effects, were removed.</p>
2k	5 and 6	Distinguish between mitigation and enhancement measures by defining each term.	– Definitions to be added	Comment satisfactorily addressed.
2l	6.1	Clearly state the potential direct and indirect effects identified in Section 5, as opposed to noting, for example, that the “possible benefits...include such things as...” (first paragraph).	– Effects to be repeated in Section 6.1.	Comment satisfactorily addressed.
2m	6.1	Explain why the first paragraph limits the identification of concerns to those “most frequently articulated,” particularly in the light of the last sentence in Point 1 under Section 2.4.	– All concerns will be repeated.	Comment satisfactorily addressed.
2n	6	Explain why some of the potential effects identified in Section 5 are not explicitly addressed in Section 6.	– Text will be added explaining that not all of the potential effects identified in the revised Section 5.0 are unique to / relevant to the Project and /or VPSP (i.e., some identified by Knowledge Holders who are not familiar with the Project scope). As discussed in the	<p>Comment partially addressed.</p> <p>For example, Section 5.2 refers to the need to provide culturally appropriate services/supports that may not currently exist (Section 5.1 notes that a potential Project benefit is an increase in multiculturalism). Yet, the options</p>

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			meeting with the peer review team, Figure 4 will be deleted.	presented in Section 6 do not refer specifically to culturally/linguistically diverse groups. As per peer review response in 2c, a rationale for excluding that segment from the list of key vulnerable groups was not found.
2o	Table 18	First list the potential effects flowing from the effects analysis, followed by the identification of options to address those effects, as is commonly done in impact assessment to provide a logical flow of analysis, thus facilitating the understanding of laypersons.	<ul style="list-style-type: none"> - With the streamlined options presented / discussed on Feb 15, Table 18 will be removed - The options will be presented directly 	Comment satisfactorily addressed.
2p	Table 18	Order the table per negative and positive effects, per direct and indirect effects and per mitigation and enhancement options.	- See 2o	Comment satisfactorily addressed
2q	Table 18	Identify the timeframes for the planning/ implementation of each option identified.	- See 2o	Comment satisfactorily addressed
2r	Table 18	Identify the key stakeholders to be involved in the planning/implementation of each option.	- See 2o	Comment satisfactorily addressed
2s	7	In the key findings, refer also to the key vulnerable groups identified and the principal negative and positive potential effects of the APM Project on them.	- Text to be added	Comment satisfactorily addressed
2t	Slides 1 to 4	We note that some of the “key vulnerable population groups” identified in the Draft Report are not specifically mentioned in any of the options. We recommend referring to them and considering targeted options for them.	<ul style="list-style-type: none"> - In the discussion of options in the revised report, examples of relevant key vulnerable population groups can be referred to. Will consider if targeted options beyond what is proposed are appropriate. - In a discussion between NWMO, DPRA, GHD and MSB on March 14 re: the March 11 peer review comments on the draft <i>Vulnerable Populations/Social Programs</i> report, it was agreed that the parties have further discussion regarding where potential effects/options for managing effects on small businesses such as 	Comment satisfactorily addressed. [Slides removed from Final Draft Report.]

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			<p>these would be addressed in the community studies. It was agreed that while the VPSP report would touch on this topic, it is not the 'primary home' for this issue.</p> <ul style="list-style-type: none"> - DPRA will identify small businesses as potentially vulnerable, and briefly explain why but we will remove small businesses from the list of populations made more vulnerable by the Project since they do not align with this study's focus on programs and services. - On March 17, MSB/GHD communicated to DPRA that while reports such as <i>Workforce Development, Vulnerable Populations & Social Programs</i> may touch on potential effects on small businesses as part of existing context/issues, all reports will point the reader to the MSB's '<i>Local Hiring Effects Study and Strategy</i>' (Deloitte, April 2022) for more fulsome discussion including options for mitigating/enhancing potential effects. 	
2u	Slide 2	Clarify if the "Campus Concept" would also apply to the contingent of non-resident construction workers and, depending on the type of housing arrangements for them, specify what types of measures might be useful to manage any potential effects arising from their comings and goings.	<ul style="list-style-type: none"> - Will add the information from the final <i>Workforce Development/Housing Demand and Needs Assessment</i> studies (Keir Corp. May 2022) on the potential 'Campus Concept' option and relationship with non-resident workers. The options in all of the community studies reports are presented by the authors to foster discussion only. They do not represent commitments or actions for the NWMO, the Municipality of South Bruce, or other parties. The final decisions on actions and commitments will be made at a future date. - Revised report can also reinforce that based on the analysis in <i>Workforce Development/ Housing Demand and</i> 	<p>Comment partially addressed. See peer review response in 2i.</p> <p>In light of the uncertainty at this stage about the relevance of foreseeing measures to manage such things as the daily and rotational transport of non-resident workers (as per DPRA's comment to the peer review comment), we recommend further study of this issue when more clarity is obtained on the relevant characteristics of the workforce. This could be done in the context of a more detailed impact assessment should South Bruce be selected as the preferred location for the Project.</p> <p>[Slides removed from Final Draft Report.]</p>

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			<p><i>Needs Assessment</i> studies, there will not be a large influx of non-resident temporary or short-term construction workers, and that those that do come will be able to find accommodations within the local/regional area</p> <ul style="list-style-type: none"> – However, at this stage in the process (community studies), measures to manage the 'comings and goings' of workers utilizing a potential temporary accommodations component of such a facility have not been identified. It is acknowledged that in conventional camp accommodations in remote areas for mining/development settings there are best practices for these types of activities, but their relevance/application in this setting is not known. There is no workforce camp associated with the Project in the South Bruce Area. 	
3		<p>The option proposed to address the potential effects of the APM Project on housing would benefit from additional detail to appreciate how it will effectively mitigate the potential effects. Aspects of that option could be more detailed by drawing in relevant details from the Housing Needs and Demand Analysis Study Draft Report and addressing for example the following recommendations:</p>	<ul style="list-style-type: none"> – Relevant details from the final <i>Housing Needs and Demand Analysis Study Report</i> (Keir Corp. May 2022) will be added to address this issue. 	<p>Peer review responses to DPRA comments on specific peer review comments provided in Rows 3a to 3c.</p>
3a	Slide 2	<p>Describe what services and infrastructure would be foreseen by the "Campus Concept," in order to provide insights into what community services/ infrastructure might be used, or not, by the staff living on the Campus.</p>	<ul style="list-style-type: none"> – At this point in the process, this level of detail has not been articulated for the potential 'campus concept' option articulated in the <i>Workforce Development/ Housing Demand and Needs Assessment</i> studies. At this point in time, it is only an option, and one of many. Please see the response above to 2u. – These details could be looked at in future studies, if the South Bruce Area 	<p>Comment satisfactorily addressed (footnote added in revised report reiterating DPRA's comments to peer review comments). [Slides removed from Final Draft Report.]</p>

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			is ultimately selected as the Project location.	
3b	Slide 2	Clarify what measures would be put in place for “supportive housing” before the end of construction.	<ul style="list-style-type: none"> - The options in all of the community studies reports are presented by the authors to foster discussion only. They do not represent commitments or actions for the NWMO, the Municipality of South Bruce, or other parties. The final decisions on actions and commitments will be made at a future date. 	<p>Comment not addressed.</p> <p>Option 3 (Temporary Accommodations that Could be Converted into Supportive Housing) addresses supportive housing after the construction phase.</p> <p>Housing of vulnerable persons may become an issue as early as pre-construction, as speculation of the influx of workers and families may increase the costs of housing for rent or purchase.</p> <p>The peer review report for the Housing Needs and Demand Analysis Study recommends the preparation of a comprehensive housing growth plan.</p> <p>We recommend specifically addressing supportive housing, in one form or another, during construction (during which there will be an estimated workforce of 640, 20% of which is estimated to be non-resident) to inform the decision about willingness to host the Project.</p> <p>[Slides removed from Final Draft Report.]</p>
3c	Slide 2	Explain why the potential mitigation options suggested for housing during the “Check-in #2” presentation (e.g., home-sharing program matching seniors with young adults) were not retained in the Draft Report.	<ul style="list-style-type: none"> - NWMO does not have a mandate/ responsibility for this type of program. - However, as per the response to 1b above, in Section 6 of the revised report, ‘Corporate Social Responsibility (CSR) Program with a stream focused on vulnerable populations and social programs/services’ (slide # 3 from February 15 meeting with the PRT) will note that NWMO/MSB could work with housing/homelessness action groups to identify ways that NWMO/MSB could possibly provide support. 	<p>Comment satisfactorily addressed.</p> <p>[Slides removed from Final Draft Report.]</p>
4		We recommend clarifying certain key statements as reproduced below:		

Comment Number	Report Section Reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Responses to DPR Comments
4a	5 and 6	<p>Explain further the following statements, particularly in the light of statements describing the potential effects of an increase in the cost of living:</p> <ul style="list-style-type: none"> - “Additionally, it is assumed that in general, the members of Project workforce and their families would not be classified as vulnerable individuals, and as such would not be expected to directly increase pressure on existing social programs and services. As such, it is not expected that the Project will result in the extent of positive or negative effects on vulnerable populations and social programs that may be anticipated by the knowledge holders.” - “As described in Sections 4 and 5, it is assumed that in general, the members of the Project workforce and their families would not be classified as vulnerable individuals, and as such would not be expected to directly increase pressure on existing social programs and services. Thus, it is not anticipated that there will be significant negative effects on vulnerable populations or social programs as a result of the Project. However, should some of the concerns expressed by knowledge holders materialize to some extent beyond what was anticipated, it is important that possible mitigation options are identified.” 	<ul style="list-style-type: none"> - See response to 2i above re: treatment of Cost of Living at this point in the siting process /community studies vs future studies if the South Bruce Area is ultimately selected as the Project location - There are a multitude of variables involved in Cost of Living, and these are beyond the scope of this community study - As per the response to comment 2i above, Knowledge Holders concerns were typically in the context of the pandemic, and in some cases the Bruce Power MCR Project. - Options for the ‘Participatory Social Monitoring Program’ and Corporate Social Responsibility (see the response to 1b above) options will contribute to understanding of any potential issues and/or potential mitigation that may be possible should issues arise. 	<p>Comment partially addressed.</p> <p>The assumption that most members of the Project workforce and their families would not be classified as vulnerable individuals, and as such would not be expected to directly increase pressure on existing social programs and services, has been removed from the Final Draft Report.</p> <p>Section 6 now states that “because there is an existing large and capable skilled workforce available regionally for the construction and operations phases of the Project as a result of Bruce Power’s MCR Project, it is expected that the overall change in population relative to the regional baseline population would be relatively small. As such, it is not anticipated that the Project would result in a significant increase in pressure on vulnerable populations or existing social programs and services in the Study Area.”</p> <p>Section 6 further states that “given the existing conditions of vulnerable populations and the increased demands being placed on social programs, it is possible that Project (combined with anticipated baseline growth) could result in some effects, albeit relatively small, on these populations and on programs.”</p> <p>As explained in 2i, the assumption that there is a large and capable workforce available regionally for the Project may be challenged; also, the assumption that the Project would not result in a significant increase in pressure on vulnerable populations or existing social programs/services is insufficiently documented.</p> <p>Validation of these assumptions is recommended as part of a more detailed impact assessment should South Bruce be selected as the preferred location for the Project. While the option involving</p>

Comment Number	Report Section Reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Responses to DPRA Comments
				PSM will assist in further understanding the potential effects, the assumptions on which the current effects assessment rests are not considered to be sufficiently documented.

Attachments

Attachment 1

Additional Comments

Attachment 1

Comments noted as less important to the fundamental purpose of the peer review are summarized as follows for NWMO's consideration in finalizing the Draft Report:

1. In Section 1.3.2, we recommend explaining why some localities identified as being part of the study area do not seem to be considered in the baseline data (e.g., Town of Minto).

DPRA Response: There has been an evolution of Project understanding since Oct, 2021; also much is dependent on the Local Study Area/Core Study Area from the *Workforce Development and Housing Demand and Needs Analysis* studies. This will be explained in the revised report.

Minto is in the Local Study Area for workforce/housing studies; the Core Study Area for Workforce/Housing includes the following five local municipalities (MSB, Huron-Kinloss, Brockton, North Huron, Morris-Turnberry).

Social services / programs are not typically provided at local municipal level, but at the county/regional level etc. Even if located in a lower-tier municipality, a program will also typically serve neighbours (e.g., see also the response to #6 below).

PRT Response: Comment satisfactorily addressed.

2. In Section 2, we recommend that the relevant Guiding Principles applicable to the Vulnerable Populations and Social Programs Studies be identified and that a brief explanation as to how they were addressed be provided.

DPRA Response: this is now being added to all of the community studies reports, and will be incorporated into the revised report.

PRT Response: Comment satisfactorily addressed.

3. In Table 3, we recommend clarifying if the rationales for the selection of vulnerable groups are based on baseline data and/or sources of potential impacts.

DPRA Response: See response to comment 2c, above.

PRT Response: Comment partially addressed, as per peer review response in 2c.

4. In Section 3.2, we recommend that the years to which baseline data refer be systematically identified and that the baseline data reported be systematically put into context (e.g., 141 Bruce County families received childcare fee subsidies in 2020 – a proportion or comparison should be provided).

DPRA Response: It is not possible to systematically present or compare the baseline data by date in Section 3.2 because what is presented is data that was readily available on each vulnerable group at the municipal level rather than based on specific dates.

PRT Response: Comment satisfactorily addressed (years in which baseline data were collected were added).

5. In Tables 12 to 17, we recommend consistently specifying which of the relevant initiatives listed are already in effect and which are still at the planning stage. Where it is noted that action tables “are in the process of developing action plans,” are timelines for implementing the plans available?

DPRA Response: This will be addressed in the revised report.

PRT Response: Comment not addressed.

6. In Section 3.3, if the information is readily available, we recommend specifying the locations of the social programs/services inventoried at the lower-tier municipality level. For example, it is stated that the inventory includes 3 programs, organizations, and/or locations that provide shelters for abused women. How many shelters are there, and can their location be provided? This example is also tied to the statement in Section 3.3.4 that a women's shelter recently initiated a human-trafficking program, without providing the location. Doing so would assist in identifying where social programs/services are under more or less pressure.

DPRA Response: DPRA attempted to do this in the initial analysis, but it did not produce useful information. Because the communities are relatively close to one another, individuals from different communities access programs and services where they are provided.

PRT Response: Comment satisfactorily addressed.

7. In Section 4.1, we recommend addressing also the aging workforce, as noted in Section 3.2.2.2 as well as in the Labour Baseline Study and Workforce Development Study, and its potential implications (e.g., recruitment, upskilling).

DPRA Response: These topics are better addressed in the *Workforce Development Study* (Keir Corp. 2022), and in other community studies being led by the Municipality of South Bruce (e.g., the *Local Hiring Effects Study and Strategy* (Deloitte, 2022)).

PRT Response: Comment not addressed. The age of the workforce available regionally/locally is a relevant characteristic to address in the Vulnerable Populations and Social Programs Studies Report; for example, it may have implications for the need to source non-resident workers, which can have potential effects on vulnerable populations.

8. In Section 4.2, we recommend removing the last bullet, which describes one of the options, as it is out of place.

DPRA Response: This will be done.

PRT Response: Comment satisfactorily addressed.

9. In Section 5.1, where it is stated that knowledge holders referred to Bruce Power's MCR Project and the effects it has had on the local communities and noted they would expect to see similar effects occur if the APM Project were to be located in South Bruce, we recommend specifying those effects.

DPRA Response: Detail was not provided by knowledge holders, they spoke generally only.

PRT Response: Comment satisfactorily addressed.

10. In Section 6, we recommend expanding the consideration of sources of information beyond discussions with knowledge holders, NWMO and MSB and literature from the NWMO and Bruce Power to identify potential options (e.g., scientific literature, projects of similar scope).

DPRA Response: This Project/setting is not similar to many of the other types of Project typically undergoing Impact Assessment /Environmental Assessment e.g.,

- this Project is not greenfield/remote,
- it is in an area with large available regional/local workforce,
- the Project workforce relative to anticipated growth without Project is relatively small
- there is not a large accommodations camp for transient workers during construction or operations
- The options identified are not dis-similar to those that are identified with respect to social programs/services for large infrastructure projects.

This could be addressed in future impact assessment or other studies, if the South Bruce Area is ultimately selected as the Project location. The experience with Bruce Power on their operations of the Generating Station, as well as the MCR Project – both of which are larger in magnitude than the potential Project – as well as the experiences of knowledge holders in that regard, provides current information that is rooted directly in the local region.

PRT Response: Comment partially addressed (e.g., the assumption that there is a “large available regional/local workforce” in the area may be challenged, as per peer review responses in Table 4.1). Agreed that the issues should be addressed in more depth in future studies.

11. In Section 6.2, we recommend explaining on what basis the factors (or criteria) for assessing the options were selected.

DPRA Response: These factors were considered generally in all of the community studies when considering potential options.

PRT Response: Comment satisfactorily addressed.

12. Inconsistencies in the use of acronyms, terminology and punctuation, typographical errors, unnecessary repetitions, errors in reproducing baseline data, etc.

DPRA Response: These will be reviewed while the final report is being prepared.

PRT Response: Comment partially 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.

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.

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.

26. 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.
27. 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.

Services and Infrastructure

28. 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.
29. 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.
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.

Services and Infrastructure (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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Visit our website:
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Visit our community engagement tool:
www.southbruceswitchboard.ca

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