

September 11, 2025

Agency File No: 89719

Jeff Balsdon, Project Manager

Atlantic Regional Office
Impact Assessment Agency of Canada
200–1801 Hollis Street
Halifax NS B3J 3N4

Dear Jeff Balsdon,

Reference: Response to Summary of Issues for Centre Village Renewables Integration and Grid Security Project

The attached table provides a response to the Summary of Issues (SOI) for the Centre Village Renewables Integration and Grid Security Project (the “Project”), provided by the Agency on August 22, 2025, that sets out how PROENERGY intends to address the key issues provided in the SOI.

Following the submission of an EIA Registration Document to the Province of New Brunswick, the Project is currently undergoing a Determination Review in accordance with the Environmental Impact Assessment (EIA) Regulations under the New Brunswick *Environmental Assessment Act*. The New Brunswick EIA process is a fulsome assessment process that is designed to identify the environmental impacts associated with a proposed development, well in advance of its implementation, such that the impacts can be avoided or reduced to acceptable levels before they occur. The process allows First Nations, government agencies – including at the federal level - and the public with the opportunity to provide input into the decision-making process.

Responses to the Key Issues are provided in the attached table. It is important to note that the issues raised will be addressed as part of the New Brunswick EIA process that is currently ongoing for the Project. Further, federal government agencies form part of the New Brunswick EIA process and are therefore involved in decision making.

Thank you for the opportunity to provide a response to these issues. Please contact the undersigned if you require further information or clarification.

Sincerely,

<Original signed by>

John Maclsaac
PROENERGY Services, LLC

Attachment: Table 1

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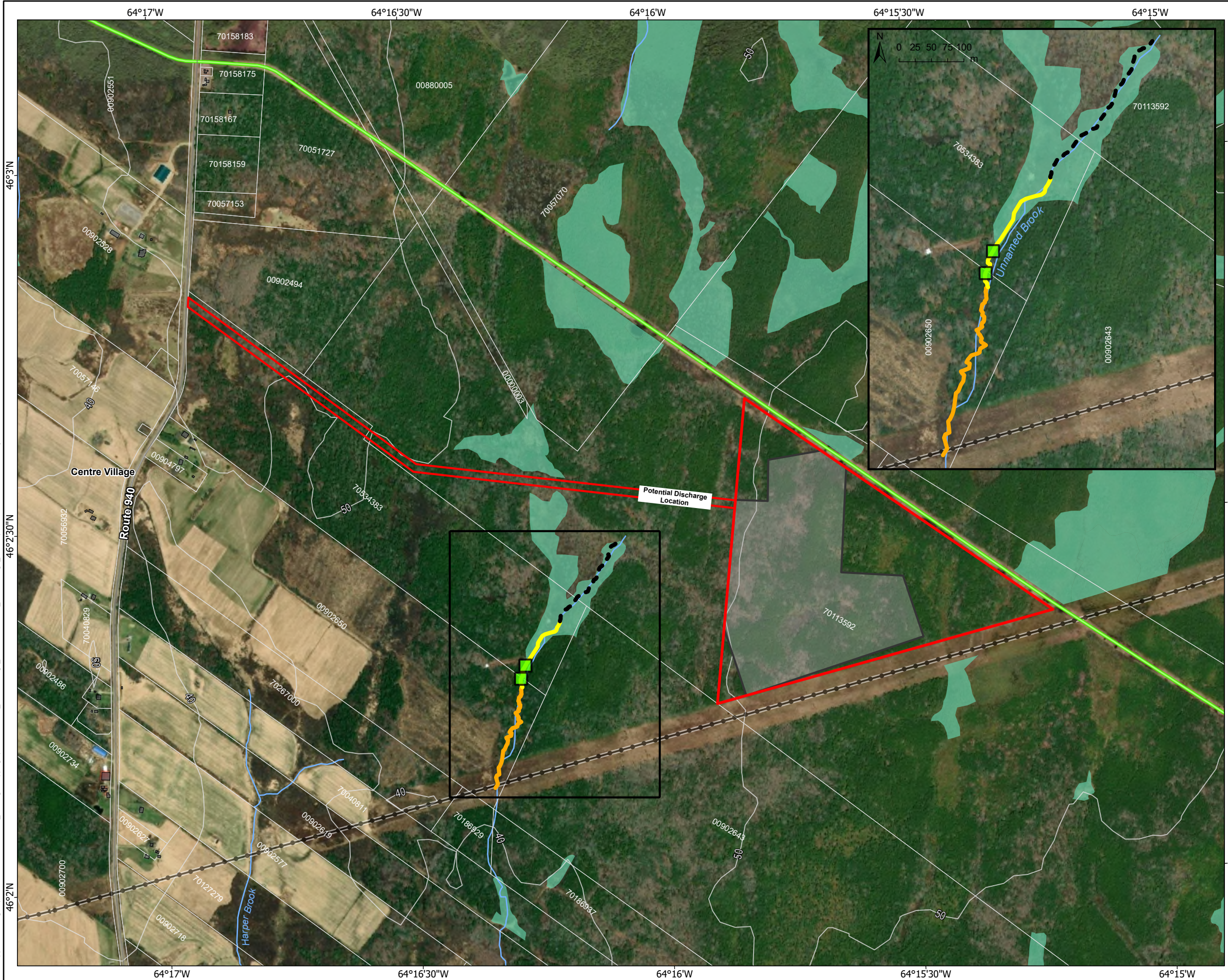
Table 1 Key Issues	
Issues	Response Approach
Fish and Fish Habitat	
<p>Concerns were raised about the potential impacts of effluent discharge into any fish-bearing waters, including watercourses identified as potential habitat for the Inner Bay of Fundy Atlantic Salmon population. Provide details on the location of the effluent discharge options, potential impacts to fish and fish habitat, including potential changes in water chemistry and temperature, and measures that could be implemented to mitigate any potential impacts.</p>	<p>Studies are currently being undertaken to evaluate effluent discharge scenarios and their potential effects on fish and fish habitat, including assessment of localized habitats to determine the potential for supporting the Inner Bay of Fundy Atlantic salmon population. Two scenarios for effluent discharge are being considered. The first is discharge into an unnamed tributary adjacent to the site, as shown on the attached Figure 1. In this scenario, effluent is discharged through a culvert under the planned site access road and directed to a downstream wetland before discharging into a channelized watercourse further to the south. The wetland and unnamed tributary are not identified as containing fish habitat. The coordinates for the start of the unnamed tributary are approximately Easting: 401897.09, Northing: 5099413.98, Zone: 20T. The second option is ditch discharge along Route 940, to the south of the access road. As part of the New Brunswick EIA process, these studies will assess both water quality (e.g., chemistry, nutrients, temperature), quantity (streamflow rates, duration and timing) and physical habitat changes. A key component of this work is the Assimilative Capacity Study, which will characterize the receiving environment of the unnamed tributary and quantify the ability of the watercourse to accept effluent without adverse effects. This assessment will consider potential changes in water chemistry, and thermal regimes under the effluent discharge scenarios. It is important to note that the effluent does not contain process water and is only concentrated groundwater following the reverse osmosis process.</p> <p>The EIA will identify mitigation and avoidance measures and incorporate these where feasible. These measures may include optimization of effluent treatment to meet applicable guidelines, siting of discharge locations and timing to reduce potential exposure of sensitive life stages, and engineering measures to promote infiltration and minimize localized effects. The EIA will identify if an authorization under section 34.4(2)(b) and/or 35(2)(b) of the <i>Fisheries Act</i> will be submitted prior to Project construction to offset potential effects to fish and fish habitat. If further evaluation is required a Request for Review will be submitted to Fisheries and Oceans Canada (DFO) prior to construction.</p> <p>As a member of the Technical Review Committee (TRC), DFO will continue to have an opportunity to review related studies and comment further on aspects of the Project's potential effects on fish and fish habitat as part of the EIA process. DFO will have opportunities to review study results, provide input on the evaluation of fish and fish habitat impacts, and comment on the effectiveness of avoidance and mitigation measures prior to regulatory decisions.</p>
Indigenous Peoples' current use of lands and resources for traditional purposes	
<p>Concerns were raised about impacts to Mi'gmaq Aboriginal and treaty rights to use lands, harvest resources (including food and plant medicines), and engage in cultural practices. Provide details on how access to traditional meeting places and travel corridors for Mi'gmaq in proximity to the Chignecto Isthmus would be maintained, including in the event of road closures.</p>	<p>PROENERGY will continue its engagement with Indigenous communities and organizations and provide responses to their questions and concerns, which include this issue. There is a running Engagement and Consultation Log for the Project that will track and embed any commitments made into the overall process, aligning transparency and fostering communication between the Nations and the Proponent. Responses to this and any other Indigenous concerns will be provided within both an assessment of effects of the project on Indigenous Communities within an effects assessment addendum that will be submitted as part of the New Brunswick EIA process for review</p>

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Table 1 Key Issues	
Issues	Response Approach
	<p>and comment by the TRC, as well as a required summary of engagement that will identify concerns identified by Indigenous communities, and indicate how these are addressed.</p> <p>PROENERGY has begun to incorporate the Mi'gmaq Rights Impact Assessment (MRIA) framework into the Project. Part of the objective being to ensure Mi'gmaq Rights are considered during Project activities to minimize, or avoid adverse effects, or replenish land and resources under the assistance of Mi'gmaq knowledge and spiritual leaders. In addition, MTI is to conduct an IKS for the proposed Project, and the results of which will be incorporated into the planning, construction, and operation of the Project. The Proponent will continue to work with MTI as part of the MRIA process. PROENERGY is committed to ensuring that Indigenous consultative bodies will be engaged and consulted when Project studies or reviews are undertaken.</p>
Indigenous Peoples' spiritual, physical, and cultural heritage	
<p>Concerns were raised about potential effects on moose, black ash, and bald eagle, all culturally significant species for Mi'gmaq, with identified harvesting of moose within ten kilometres of the project site and black ash observed on site during vegetation surveys. Provide details on how potential impacts to these species of importance would be mitigated.</p>	<p>PROENERGY will continue its engagement with Indigenous communities and organizations and provide responses to their questions and concerns, which include this issue. Field studies completed for the Project will inform our response to the identified concerns about potential effects on culturally significant species for Mi'gmaq. As noted above, the provincial EIA process requires a summary of engagement that identifies concerns raised by Indigenous communities, and how these have been addressed. All comments received will be summarized and addressed in the effects assessment addendum.</p> <p>Specifically in relation to black ash, a small cluster were identified 12 m outside the access road right-of-way, and the Project footprint has been adjusted to ensure they will be avoided. In addition to targeted vascular plant surveys, botanists and other field biologists with the ability to identify black ash were on site for various other surveys, including bird surveys, placing ARUs, and wetland delineation and assessment, and were on the look out for black ash. No other records have been noted within the Project area. The site does not represent suitable nesting habitat for bald eagle, although one was noted flying over the site.</p> <p>An assessment of the environmental effects of the Project on the terrestrial environment, which will include consideration of moose, black ash, and bald eagle, will be submitted as part of the New Brunswick EIA process.</p> <p>PROENERGY has begun to incorporate the Mi'gmaq Rights Impact Assessment (MRIA) framework into the Project. Part of the objective being to ensure Mi'gmaq Rights are considered during Project activities to minimize, or avoid adverse effects, or replenish land and resources under the assistance of Mi'gmaq knowledge and spiritual leaders. In addition, MTI is to conduct an IKS for the proposed Project, and the results of which will be incorporated into the planning, construction, and operation of the Project. The Proponent will continue to work with MTI as part of the MRIA process. PROENERGY is committed to ensuring that Indigenous consultative bodies will be engaged and consulted when Project studies or reviews are undertaken.</p>

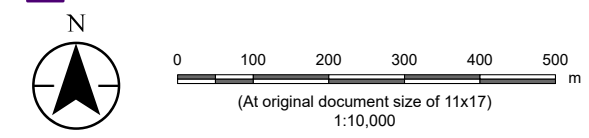
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Table 1 Key Issues	
Issues	Response Approach
Migratory birds	
<p>Concerns were raised about the project's proximity to the Chignecto Isthmus (an important corridor for migratory birds) and potential impacts to migratory birds resulting from habitat loss and fragmentation, sensory disturbance (increased noise, vibration and lighting), and vehicle collisions during construction and operation. Provide information on measures that would be in place to manage potential adverse effects to migratory birds and clarify how the project would comply with the <i>Migratory Birds Convention Act, 1994</i> and their respective regulations.</p>	<p>This key issue will be addressed in the environmental effects assessment addendum which will be submitted to regulators as part of the New Brunswick EIA process and will describe the mitigation that will be implemented and applicable regulatory requirements. The Project will include mitigation by design, including:</p> <ul style="list-style-type: none"> • Vegetation clearing will be limited to areas required for construction and safe operations. • Vegetation clearing will be completed outside the migratory bird nesting period. Where activities may result in risk of harm to migratory bird nests during this period (e.g., limited vegetation clearing, nesting on Project infrastructure) or during the nesting period for other species (i.e., raptors), a qualified biologist will complete a pre-activity nest survey in accordance with Environment and Climate Change Canada guidelines. • If an active bird nest is found, beneficial management practices will be followed, including applying an appropriate setback and timing restriction, and New Brunswick Fish & Wildlife (NRED) and/or Canadian Wildlife Service (CWS) will be consulted, as appropriate. • Facility lighting will follow best practices and use downward directional lighting. • Field studies have not identified nests of Schedule 1 migratory bird species (e.g., pileated woodpecker; great blue heron) that would be impacted by the Project. Should any be identified, PROENERGY would consult with CWS to ensure any applicable permitting requirements are met.



Legend

- Project Area
- Development Footprint (Approximate)
- Aquatic Survey Results**
- Beaver Dam
- Channelized Watercourse
- Impoundment / Flooded Wetland
- Overland Drainage
- Built Infrastructure**
- Road
- Transmission Line (Existing)
- Pipeline (Existing)
- Building
- Agricultural Land (ARMS)
- Wetlands and Waterways**
- Watercourse
- Wetland (NBELG)
- Wetland (Stantec)



- Notes**
1. Coordinate System: WGS 1984 Web Mercator Auxiliary Sphere
 2. Data Sources: NB Power; Stantec; GeoNB (NBHN, NBRN); NB Natural Resources and Energy Development; NB Environment and Local Government; NB Agriculture, Aquaculture and Fisheries; Service NB.
 3. Background: Esri, USGS, Maxar



Project Location: Centre Village, NB Prepared by AC on 2025-09-11

Client/Project: PROENERGY RIGS-Centre Village 121418452

Figure No. **1**

Title: **Effluent Discharge Options**

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