

Dear Minister,

I am writing to formally request that the proposed Bell Canada AI Data Centre in the Rural Municipality of Sherwood, Saskatchewan, be designated for federal impact assessment pursuant to Section 9(1) of the *Impact Assessment Act*, SC 2019, c 28, s 1 (“IAA”).

On May 4, 2026, I submitted a formal designation request to the Impact Assessment Agency of Canada (“IAAC”). On May 15, 2026, the Prairie and Northern Region of IAAC advised that designation requests must be submitted directly to the Minister with copies provided to IAAC. This correspondence constitutes that formal request.

The proposed project is a 300-megawatt, 90K-square-foot industrial AI data centre to be constructed on approximately 160 acres of agricultural land in the RM of Sherwood, Saskatchewan. This will allegedly be the largest AI data centre development in Canada.

Living within a 9 km radius of this massive structure, and researching the impacts other similar data centres have had in their communities, this project raises substantial concerns within federal jurisdiction, including potential impacts on fish habitat and groundwater systems, migratory birds, Indigenous rights and consultation obligations, and Canada’s climate commitments.

To my knowledge, there has been no independent provincial or federal environmental assessment has been publicly disclosed, despite the scale and significance of the development. I’m not sure how a proper environmental assessment could have possibly been done in the 21 days from announcement to approval of the project.

Further, construction equipment was onsite and the digging began April 21, 2026.

The pre-testing activities were commenced on site prior to approval, including assessments related to piling depth and aquifer penetration?

The RM of Sherwood map shows that there are pipelines running through the property and the Enbridge Alberta Clipper is close by. That’s intrinsically safe with all the heavy duty equipment there?

Given the limitation contained in Section 9(7) of the IAA respecting projects that have “substantially begun,” I respectfully urge the Minister to consider this request on an expedited basis.

The legal and factual basis for designation includes the following:

- 1. Potential Adverse Effects on Fish Habitat and Aquatic Systems**

The project may engage Sections 35 and 36 of the *Fisheries Act*, RSC 1985, c F-14. Bell Canada has publicly acknowledged ongoing pre-construction testing related to aquifer penetration beneath the site. Groundwater systems in the region are interconnected with drainage systems and surface waters supporting fish habitat under federal jurisdiction.

Any alteration to groundwater flow, contamination, or discharge affecting fish-bearing waters may require federal authorization and review by Fisheries and Oceans Canada.

## **2. Potential Impacts on Migratory Birds**

The project is located within the operational influence area of the Wascana Centre Bird Sanctuary, one of the largest urban bird sanctuaries in North America. Continuous industrial operations and associated noise impacts may adversely affect migratory birds, nesting behaviour, and habitat use.

These concerns engage federal responsibilities under the *Migratory Birds Convention Act, 1994*.

## **3. Indigenous Rights and Duty to Consult**

The proposed development is situated within Treaty 4 territory. Gordon First Nation holds Treaty Land Entitlement holdings directly north of the project site. Public statements from community members indicate concerns regarding insufficient consultation and potential impacts on Treaty rights.

Section 35 of the *Constitution Act, 1982* and the federal government's commitments under the *United Nations Declaration on the Rights of Indigenous Peoples Act* require meaningful consultation where Crown decisions may adversely affect asserted or established Indigenous or Treaty rights.

## **4. Climate Change and Energy Infrastructure Concerns**

Section 22(1)(i) of the IAA requires consideration of a project's contribution to or interference with Canada's environmental and climate obligations. A continuous 300-megawatt electrical load would place extraordinary demand on Saskatchewan's electrical grid and may necessitate significant new energy generation infrastructure.

The lifecycle greenhouse gas implications associated with powering this facility warrant comprehensive federal assessment.

## **5. Need for Independent Federal Oversight**

To my knowledge, no Ministerial Determination has been issued under Saskatchewan's *Environmental Assessment Act* in relation to this project. Given the scale

of the development, the accelerated municipal approval process, and concerns raised regarding procedural fairness and independence, federal review is necessary to ensure transparency, accountability, and public confidence.

Accordingly, I respectfully request that the Minister:

- Exercise the designation authority under Section 9(1) of the *Impact Assessment Act* in relation to the Bell Canada AI Data Centre project in the RM of Sherwood;
- Direct the Impact Assessment Agency of Canada to notify the project proponent and municipal authorities that federal review is under consideration and that construction activities should not proceed to the point of substantial commencement pending determination;
- Request independent review by Fisheries and Oceans Canada regarding groundwater and fish habitat implications under Sections 35 and 36 of the *Fisheries Act*;
- Request assessment by the Canadian Wildlife Service regarding impacts on migratory birds and the Wascana Centre Bird Sanctuary;
- Ensure full and meaningful participation opportunities for affected Treaty 4 First Nations, including appropriate consultation support and funding;
- Require assessment of the project's greenhouse gas implications and associated energy infrastructure requirements; and
- Provide written confirmation of receipt of this designation request and notice of the Agency's determination process.

Canada's federal environmental assessment framework exists to ensure that projects of national significance and potential interjurisdictional impact receive transparent, science-based, and independent review. Given the scale, precedent-setting nature, and potential environmental and constitutional implications of this project, federal involvement is both appropriate and necessary.

I remain available to provide supporting documentation, records, and additional information upon request.

Respectfully submitted,

<personal information removed>

Regina, Saskatchewan