



5 May 2026

By email to:
Terence Hubbard
President, Impact Assessment Agency of Canada
terence.hubbard@iaac-aeic.gc.ca

The Honourable Joanne Thompson
Minister of Fisheries and Oceans
joanne.thompson@parl.gc.ca

The Honourable Julie Dabrusin
Minister of Environment, Climate Change and Nature
julie.dabrusin@parl.gc.ca

The Honourable Rebecca Alty
Minister of Crown-Indigenous Relations
rebecca.alty@parl.gc.ca

Re: Two Proposed 300-megawatt fossil fuel power generating plants in Pictou County, Nova Scotia

Dear Mr. Hubbard and Ministers Thompson, Dabrusin, and Alty:

We are writing on behalf of our 3,500+ members in Nova Scotia, and allies in Pictou County, with grave environmental and social concerns regarding the two 300-megawatt fossil fuel power generating plants being proposed by the Nova Scotia Independent Energy System Operator (IESO) in Pictou County. These have already been greenlit by Nova Scotia's environmental assessment process, with little to no effort by the Provincial Government to address concerns from the community about these unneeded, unwanted, and unhealthy plants. They threaten wild salmon and serve to continue our region's dependence on outdated fossil fuels rather than transition to a clean energy system. We have seen no effort made to engage Mi'kmaq leadership in full and proper consultation on this proposal.

Our understanding is that the Impact Assessment Agency of Canada is currently in a planning phase to determine whether to proceed with a full impact assessment of the proposal from the IESO. We urge you to proceed with a full federal environmental impact assessment. The provincial process has failed to account for the proposal's many risks.

It is also important to note that the public received little notice of what was initially one planned plant (as late as October, 2025), then two (in November), ramping production far beyond what the grid requires. The public received just 40 days to submit comments to Nova Scotia Environment and Climate Change (NSECC), and only 35 days to submit comments to the IAAC on the two proposed plants. Unfortunately, contrary to its stated intentions, NSECC has yet to publish the comments it received. Federally, the responses have overwhelmingly expressed great concern with the chosen sites and questioned the need for the project, and why gas was pre-ordained as the method of energy generation as Nova Scotia works to transition away from fossil fuels.

With consideration of the IAAC's mandate, we want to highlight the following specific concerns, which come not only from us and our membership, but from members of the Pictou County community, organizations representing the interests of Mi'kmaq First Nations and the environment:

Lack of Indigenous Consultation

You have received submissions from several Mi'kmaq First Nations and groups working on behalf of the Mi'kmaq of Nova Scotia, including Kwilmu'kw Maw-Klusuaqn, Sipekne'katik First Nation, and Pictou Land First Nation. We want to echo and amplify the crucial voices of the Mi'kmaq, First Peoples of Mi'kma'ki, including what is now Nova Scotia.

In the Kwilmu'kw Maw-Klusuaqn (KMK or Mi'kmaq Rights Initiative) submission to IAAC on this matter, Director of Consultation Twila Gaudet noted that "this project has significant potential to impact salmon, moose and black ash, at a minimum. Accordingly, it has the potential to cause **appreciable adverse impacts to the Mi'kmaq's established and asserted fishing, hunting and harvesting rights.**" I have added the emphasis to highlight the crucial concern for the IAAC, that this project will cause, without consultation, significant harm to Indigenous traditions and established land-use rights.

Species of Concern

The West River and the East River in Pictou County support two of the few remaining relatively healthy Atlantic salmon populations in Nova Scotia. The proposed Marshdale plant would be located along a major tributary of the East River and the proposed Salt Spring plant would be located at the headwaters of the West River. We are seriously concerned that infrequent but sustained large volumes of treated and/or heated water discharges into these areas of critical salmon spawning and rearing habitat could be catastrophic for these local populations.



Atlantic salmon are federally listed as a species of special concern and are of special concern to the local community. This proposal represents a grave threat to Atlantic salmon and significant risk to other Special Concern species including the American eel, as was expressed in KMK's submission. The proponent was seemingly unaware of the presence of Atlantic salmon or any other species in the waterways when they decided on these locations.

We also have concerns about potential impacts on migratory birds. There are two Species at Risk Act (SARA) listed species, the Canada Warbler and the Eastern Wood-peewee, that are known to use the site during breeding season. At the Salt Springs Project Site, the Common Nighthawk has also been observed in suitable habitat during breeding season. The Evening Grosbeak has been observed outside of breeding season.

Building fossil fuel generators in these sensitive, greenfield areas is ill-considered and contrary to federal and provincial recovery objectives for species preservation and protection.

The proponent does not commit to avoiding impacts in the wetlands and other habitats where these species were observed. Impacts to the known and predicted habitat of these SARA-listed species at the sites should be avoided as per SARA (and the *Migratory Birds Convention Act*).

The three species of *Myotis* listed as Endangered under SARA may be present at the site. Habitat-suitability modelling predicts suitable foraging habitat at both sites, as well as suitable roosting habitat at the Salt Springs site.

The proponent completed no dedicated bat surveys at either site. This should have been done to inform infrastructure placement and other potential mitigation options.

Energy Concerns

While this is not generally in the IAAC purview, it is important to note that the IESO released a call for gas generators based on an outdated (from 2020) Integrated Resource Plan by Nova Scotia Power. Since that document was written, the capacity of alternatives to gas peaker plants (like grid-scale battery storage and virtual power plants) has grown exponentially. Moreover, at a time of heightened energy insecurity, we should be planning instead to improve interprovincial grid sharing. No other peaker options were considered, and the move to gas was incredibly expedient, likely politically motivated under a government committed to resource extraction, particularly fracking for gas, a methane fuel 80 times more potent than carbon dioxide at heating the atmosphere over a 20-year period.



Because the provincial government has failed to listen to the concerns of Nova Scotians, account for the environmental and social risks of this project, or consider alternative sources of needed energy capacity, there is no public trust in the provincial government on this issue. The public's mistrust is heightened by the provincial government's determination to open Nova Scotia to fracking for gas, despite the public's overwhelming rejection of fracking during an extensive provincewide public consultation in 2014. For these reasons, I strongly urge you to proceed with a full federal environmental impact assessment for these two fossil fuel plants, considering specifically the areas in your mandate, i.e. the risks to migratory birds, aquatic species of concern, and full and proper Indigenous consultation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Maggy Burns', with a large, sweeping flourish extending to the right.

Maggy Burns
Executive Director

