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16 November 2026

The Hon Julie Dabrusin, PC, MP
Minister of Environment, Climate Change and Nature

Daisy Hsu, Project Manager
Impact Assessment Agency of Canada, Ontario Region

Re: Support for the Pelee Island Bird Observatory's request for designation under subsection 9(1) of the Impact Assessment Act: DRW NX Co. guyed antenna structure, 1246 Centre Dyke Road, Pelee Island, Ontario

Dear Minister Dabrusin and Ms. Hsu,

Nature Canada is writing in support of the Pelee Island Bird Observatory's (PIBO) request of 6 October 2026 that you designate this project for a federal impact assessment under subsection 9(1) of the Impact Assessment Act.

As one of Canada's oldest nature charities, Nature Canada feels strongly that an antenna of this type that possesses the features most commonly linked to bird and bat collision mortality should not be built in one of Canada's most important places for migratory birds. At a minimum, any project in a place of such significance should receive careful assessment of the impact it will have on nature, particularly on migratory birds and species at risk.

Pelee Island sits at the intersection of the Atlantic and Mississippi flyways and is part of the primary route used by migratory birds crossing Lake Erie and is both an Important Bird Area and a designated Key Biodiversity Area. This is a particularly important nocturnal migration route, with PIBO recording up to three times as many night flight calls over the island as over the nearby mainland.

The proposed ~180 metre tower would be guyed and lit. Height, guy wires, and lighting are the features that are most associated with bird deaths at communication towers. Communication towers in the United States and Canada are estimated to kill 6.8 million birds a year with roughly 16 times as many bird deaths at guyed towers compared to unguyed towers of a similar height. Night migrating songbirds are particularly vulnerable as they are attracted to light and can not see or avoid the guy wires before colliding with them. In a key migration corridor such as this, a tower of this type would have a disproportionately high impact on migratory birds.

As no assessment has thus far been conducted by any relevant government authority and the cumulative effect of such structures is unknown, Nature Canada believes that as per subsection

6(2) of the Impact Assessment Act, the precautionary principle must be applied and the project must be designated under subsection 9(1) of the Act.

We ask that the project be designated, and that no federal authorizations be issued, until the effects on migratory birds, species at risk, and their habitat be fully assessed.

Yours sincerely,



Emily McMillan
Executive Director

cc. Innovation, Science and Economic Development Canada, Southwestern Ontario District Office
Pelee Island Bird Observatory