

**CNSC Table: Consolidated Public and Indigenous Groups' Comments on the Nuclear Power Demonstration (NPD) Closure Project Draft EIS**

**Tableau pour la CCSN: Commentaires consolidés du public et des groupes autochtones sur l'ébauche de l'EIE du Projet de fermeture du réacteur nucléaire de démonstration (RND)**

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<p align="center"><i>Note: The following comments and questions are presented in the official language chosen by the commenter. The CNSC will respond in that same language.</i></p> <p align="center"><i>Note: Les commentaires ci-dessous sont présentés dans la langue officielle choisie par l'intervenant. La CCSN répondra dans cette même langue.</i></p>					
1.	Environmental Assessment (EA) Process / Processus d'évaluation environnementale (EE)	<a href="#">Canadian Coalition for Nuclear Responsibility</a> (CCNR) (Feb. 13, 2018 / 13 février 2018)	General / Général	The commenter believes this is a disservice to Canadians, whose taxes are funding this project and other very expensive radioactive waste management schemes. The commenter finds it unacceptable that federal authorities, such as the Canadian Nuclear Safety Commission (CNSC) and the Canadian Environmental Assessment Agency, collude with the nuclear industry to foreshorten the time allotted for sober deliberation. These are not decisions for 20, 30 or 40 years; they are decisions for eternity.  [Please see page 8 of the commenter's submission for more information.]	
2.	EA Process / Processus d'EE	<a href="#">Erin Parker</a> (Feb. 12, 2018 / 12 février 2018)	General / Général	The commenter wonders why, if the public is opposed to the NPD Closure Project and it is deemed unsafe, we are moving forward with it.	
3.	EA Process / Processus d'EE	<a href="#">Northwatch</a> (Feb. 19, 2018 / 19 février 2018)	General / Général	The commenter makes three requests to the CNSC: <ol style="list-style-type: none"> <li>1. Require CNL to respond to information gaps, deficiencies and questions raised by public intervenors and reviewers before the review proceeds. More specifically, the commenter requests that CNL respond to Northwatch's information requests in a timely fashion.</li> <li>2. Require CNL to resubmit a revised draft Environmental Impact Statement (EIS) after the above step has been completed, and make it subject to a review by the federal departments and the public in a manner similar to the review that closed in February 2018.</li> <li>3. Review the protocol between CNSC and CNL in an open and transparent manner, engaging the public and Indigenous peoples in a process that leads to a revision of the protocol (including the timeline) to improve the review process and better accommodate the level of public and indigenous interest, and better reflect lessons learned in this process to date.</li> </ol>	
4.	EA Process / Processus d'EE	<a href="#">William Turner</a> (Feb. 9, 2018 / 9 février 2018)	General / Général	The commenter is of the opinion that the total number of pages associated with this document and the various Technical Supporting Documents (TSDs) makes it impossible to conduct a reasonable review of the proposed project within the constraints of the relatively short review period.  Therefore, the commenter concludes that CNL has failed to address one of the purposes of the <i>Canadian Environmental Assessment Act, 2012</i> (CEAA 2012), which states, under paragraph 4(1)(e): The purposes of this Act are [...]to ensure that opportunities are provided for meaningful public participation during an	

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				environmental assessment..." [Please see page 6 of the commenter's submission for more details.]	
5.	EA Process / Processus d'EE	<a href="#">Eva Schacherl</a> (Feb. 13, 2018 / 13 février 2018)	General / Général	The commenter is of the opinion that because the Government of Canada introduced legislation to significantly change EA policies and structures in Canada, the NPD Closure Project should be approached under the new EA framework with ample public consultation, as well as consultation and negotiation with affected Indigenous groups.	
6.	EA Process / Processus d'EE	<a href="#">Canadian Environmental Law Association</a> (CELA) (Feb. 13, 2018 / 13 février 2018)  <a href="#">Eva Schacherl</a> (Feb. 13, 2018 / 13 février 2018)	General / Général	<p><i>Concerns on this topic were expressed by more than one commenter, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p> CELA recommends that the federal government conduct a strategic environmental assessment (SEA) under the proposed Bill C-69 ( <i>An Act to enact the Impact Assessment Act and the Canadian Energy Regulator, to amend the Navigation Protection Act and to make consequential amendments to other Acts</i> ), once adopted. CELA further notes that an SEA will allow Canada to develop a comprehensive and publicly informed nuclear waste management policy for all types of nuclear waste in Canada.  This recommendation is supported by Eva Schacherl.	
7.	EIS Deficiencies / Lacunes de l'étude d'impact environnemental (EIE)	<a href="#">Algonquin Anishinabeg Nation Tribal Council</a> (AANTC) (Feb. 13, 2018 / 13 février 2018)  <a href="#">Bonnechere River Watershed Project</a> (Feb. 13, 2018 / 13 février 2018)  <a href="#">Métis Nation of Ontario</a> (MNO) (Feb. 14, 2018 / 14 février 2018)	General / Général	<p><i>Concerns on this topic were expressed by more than one commenter, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p> The AANTC finds that the draft EIS (with its supporting documentation) should not be accepted or approved in its current form, because it is incomplete, inconsistent, and inadequate in terms of providing a proper or adequate assessment of the potential impacts of the proposed project, specifically with respect to groundwater and surface water quality.  The Bonnechere River Watershed Project echoes this concern and supports the above recommendation.  Furthermore, the MNO notes that the lack of information contained in the draft EIS and the lack of consideration given to the limited information therein, are matters for which CNL and the CNSC are responsible.	
8.	EIS Deficiencies / Lacunes de l'EIE	<a href="#">William Turner</a> (Feb. 9, 2018 / 9 février 2018)	General / Général	Given the numerous deficiencies, the commenter is of the opinion that the draft EIS requires a total rewrite, and requests the opportunity to review the final EIS before the CNSC produces their EA report.	

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9.	Decommissioning and Waste Policies, Standards and Guidelines / Politiques, normes et lignes directrices de déclasserment	<a href="#">Anna Bogic</a> (Feb.7, 2018 / 7 février 2018) <a href="#">Candace Wooley</a> (Feb. 11, 2018 / 11 février 2018) <a href="#">CCNR</a> (Feb. 13, 2018 / 13 février 2018) <a href="#">Christina Anderman</a> (Feb. 13, 2018 / 13 février 2018) <a href="#">Eva Schacherl</a> (Feb. 13, 2018 / 13 février 2018) <a href="#">Judith Maclean Miller</a> (Feb. 9, 2018 / 9 février 2018) <a href="#">Lynn Jones</a> (Feb. 13, 2018 / 13 février 2018)	General / Général	<p><i>Concerns on this topic were expressed by more than one commenter, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p> <p>Various commenters suggest that the Canadian Government needs to develop a federal policy or legislation on the long-term management of radioactive waste materials. Others suggest that Canada needs a reform of nuclear governance to ensure the parliamentary oversight of nuclear waste disposal decisions, and that nuclear waste must be managed responsibly in state-of-the-art facilities.</p> <p>The CCNR and Eva Schacherl request that the EA be suspended until the Government of Canada has developed a policy on the long-term management of post-fission radioactive waste materials, other than irradiated nuclear fuel, that specifies which types of facilities must be used for each type of waste.</p>	
10.	Decommissioning and Waste Policies, Standards and Guidelines / Politiques, normes et lignes directrices de déclasserment	<a href="#">Dr. J. R. Walker</a> (Jan. 2, 2018 / 2 janvier 2018)  <a href="#">Juan Pedro Unger</a> (Feb. 13, 2018 / 13 février 2018)	General / Général	<p><i>Concerns on this topic were expressed by more than one commenter, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p> <p>The commenters note that the CNSC and its licensees must adhere to the <i>Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management</i> [1], which was ratified by Canada. The Joint Convention defines decommissioning as follows: "...all steps leading to the release of a nuclear facility, other than a disposal facility, from regulatory control. These steps include the processes of decontamination and dismantling."</p> <p>Mr. Unger is of the opinion that the proposed project does not meet this definition. Whether the CNSC has produced an alternative definition of decommissioning is irrelevant since the Joint Convention, once ratified, is not optional.</p> <p>Of a similar perspective, Dr. Walker provides the following reasons for why the proposed project would cause Canada to be in violation of its obligations under the Joint Convention:</p> <ul style="list-style-type: none"> <li>• Internationally endorsed criteria and standards have been ignored (e.g. [2, 3])</li> </ul>	

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				<ul style="list-style-type: none"> <li>Reasonably predictable impacts on future generations are greater than those permitted for the current generation</li> <li>Undue burdens are imposed on future generations</li> </ul> <p>References:</p> <p>[1] IAEA, <i>Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management</i>, International Law Series No. 1, 2006.</p> <p>[2] IAEA, <i>Decommissioning of Facilities</i>, General Safety Requirements Part 6, IAEA, Vienna, 2014.</p> <p>[3] IAEA, <i>Disposal of Radioactive Waste</i>, Specific Safety Requirements SSR-5, 2011.</p>	
11.	Project Proponent / Promoteur du projet	<a href="#">Herbert Fitzroy</a> (Feb. 13, 2018 / 13 février 2018)	General / Général	<p>The commenter raises concerns with the management team at CNL, underfunding and improperly using tax dollars.</p> <p>The commenter notes that approximately 70 % of CNL's executives have departed from the company since it was privatized, including the executive charged with the NPD Closure Project, who had direct experience with entombment (whereas the new executive does not). Consequently, the commenter begs the question: who is the expert behind the licence to perform this rarely performed act of entombing a large nuclear reactor site in Canada?</p> <p>The commenter warns that the CNSC cannot solicit public comments on a project without allowing Canadians to express concerns about what is in the public domain regarding the company (and its leaders) managing a nuclear site. The commenter is of the opinion that concerns about business practices and ethics are valid and must be heard, even if they may be considered out of scope of the draft EIS, particularly when there is an incentive for CNL to withhold or manipulate vital information (e.g., toxicity in the environment) in order to present a more ideal picture of the project.</p>	
12.	CNSC's Role and Responsibilities / Rôle et responsabilités de la CCSN	<a href="#">Bonnechere River Watershed Project</a> (Feb. 13, 2018 / 13 février 2018)  <a href="#">CCNR</a> (Feb. 13, 2018 / 13 février 2018)  <a href="#">Chris Cavan</a> (Feb. 12, 2018 / 12 février 2018)	General / Général	<p><i>Concerns on this topic were expressed by more than one commenter, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p> <p>The commenters note that the CNSC frequently asserts "We will never compromise safety", and that this is the mark of a dedicated regulator. In the case of an operating nuclear reactor, quick and cheap "solutions" are not tolerated by the CNSC if those approaches represent a degradation of containment aspirations. Commenters suggest that the CNSC adopt a similarly uncompromising attitude toward the long-term management of radioactive wastes produced by nuclear fission technology, and ensure that their safe</p>	

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		février 2018)  <a href="#">Michele and Ronald Kaulbach</a> (Feb. 7, 2018 / 7 février 2018)		<p>disposal be carried out in conformity with international standards. To abandon these wastes beside a major waterbody is not, according to the commenters, a responsible approach to radioactive waste management.</p> <p>The CCNR notes that the CNSC has an obligation to do everything in its power to ensure that the Canadian public is given the opportunity to learn about the nature of post-fission wastes other than irradiated nuclear fuel, and to help formulate principles that should be applied to the long-term management of such radioactive wastes. The CCNR believes that the private consortium of multinational corporations that own and operate CNL should not decide what is best on the basis of what is most convenient and profitable for them. There is a need for broad consultation with Canadians, including Indigenous groups, on basic principles to be applied vis-à-vis the long-term management of post-fission radioactive wastes (other than irradiated nuclear fuel).</p> <p>Other commenters are also concerned about future generations, noting that the CNSC has a duty to all Canadians and Indigenous groups to ensure that proper time is taken by responsible and completely credible, qualified companies who have proven to be law-abiding. The CNSC must ensure that any company that undertakes critical project proposals does everything possible to safeguard Canadians' drinking water.</p>	
13.	CNSC's Role and Responsibilities / Rôle et responsabilités de la CCSN	<a href="#">Joann McCann</a> (Feb. 12, 2018 / 12 février 2018)	General / Général	<p>The commenter poses the following questions:</p> <ul style="list-style-type: none"> <li>• Who will ensure that the proposed project is built to the standards in the Project Description?</li> <li>• Will CNSC inspectors be onsite every day to verify CNL's construction work (e.g., type of materials used)?</li> </ul>	
14.	CNSC's Role and Responsibilities / Rôle et responsabilités de la CCSN	<a href="#">Judith Fox Lee and Ormond Lee</a> (Feb. 13, 2018 / 13 février 2018)	General / Général	<p>The commenters note that Canada is a party to the following international human rights treaties, conventions and covenants:</p> <ul style="list-style-type: none"> <li>• The United Nations Universal Declaration of Human Rights</li> <li>• The United Nations International Covenant on Civil and Political Rights</li> <li>• The United Nations International Covenant on Economic, Social, and Cultural Rights</li> <li>• The United Nations Convention on the Prevention and Punishment of the Crime of Genocide</li> <li>• The Nuremberg Principles</li> <li>• The United Nations Convention on the Rights of a Child</li> </ul>	

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				<ul style="list-style-type: none"> <li>The Helsinki Agreement</li> </ul> Consequently, the commenters argue that Canada is not doing its job of protecting its citizens (and the environment) from becoming unknowing subjects in what amounts to actual experimentation – by allowing rejected, insufficient and unproven technologies of storage of nuclear waste, which have the strong potential to expose them unduly to unnecessary releases of ionizing radiation. The commenters challenge the authority of the federal government and the CNSC to cause unknown rates of fatal cancers, genetic effects, incalculable illnesses and damage to the general population, flora and fauna surrounding the project site.	
15.	CNSC's Role and Responsibilities / Rôle et responsabilités de la CCSN	<a href="#">Lady Diana Gillam</a> (Feb. 7, 2018 / 7 février 2018)  <a href="#">OFWCA</a> (Feb. 8, 2018 / 8 février 2018)	General / Général	<p><i>Concerns on this topic were expressed by more than one commenter, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p> The commenters call on the CNSC to stop this project, as well as the “equally hazardous” NSDF Project.  Ms. Gillam indicates that there appears to be no knowledgeable supervisory body of informed scientists with powerful jurisdiction in this matter, and that there is a general atmosphere of trust and faith by both citizens and government in commercial organizations that are primarily interested in profit. Ms. Gillam recommends that a special scientifically-staffed commission be set up to study this proposed project in more depth, and with reference to (at least) international standards.  Similarly, the OFWCA is of the opinion that if CNSC approves these proposals or the ten-year licence renewal for the Chalk River Laboratories, the CNSC will lose any remaining credibility.	
16.	CNSC's Role and Responsibilities / Rôle et responsabilités de la CCSN	<a href="#">Joann McCann</a> (Feb. 12, 2018 / 12 février 2018)	General / Général	The commenter raises the concern that many people do not seem to know about the NPD Closure Project, and asks whether the CNSC publishes information about the EA and hearings in local papers. If not, the commenter suggests that the CNSC do so, since many local people do not check the CNSC's website.	
17.	CNSC Impartiality / Impartialité de la CCSN	<a href="#">Herbert Fitzroy</a> (Feb. 13, 2018 / 13 février 2018)	General / Général	The commenter questions why the departure of CNL's former executive in charge of the NPD Closure Project was announced to CNL employees, yet neither the CNSC nor CNL informed the public of this key fact.  The commenter notes that this former executive was the expert at the information sessions on this project, had the experience and the know-how, and that his name was on all the project documentation. The commenter raises concern that the new executive appointed to this role was not advocating	

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				<p>entombment before privatization, and has no experience with entombment.</p> <p>The commenter is of the opinion that these factors reveal a culture of opaqueness and secrecy on behalf of both CNL and the CNSC.</p> <p>[Please refer to the commenter's submission for more information.]</p>	
18.	CNSC Impartiality / Impartialité de la CCSN	<p><a href="#">Candace Wooley</a> (Feb. 11, 2018 / 11 février 2018)</p> <p><a href="#">Chris Cavan</a> (Feb. 12, 2018 / 12 février 2018)</p> <p><a href="#">Judith Fox Lee and Ormond Lee</a> (Feb. 13, 2018 / 13 février 2018)</p> <p><a href="#">OFWCA</a> (Feb. 8, 2018 / 8 février 2018)</p>	General / Général	<p><i>Concerns on this topic were expressed by more than one commenter, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p> <p>The commenters are of the opinion that as the sole decision-maker for the NPD Closure Project and as Canada's sole nuclear regulator, the CNSC should be viewed as a "captured" regulator who promotes the very projects it is charged with regulating. The commenters further note that this is not "independent" regulation, and claim that the federal government's Expert Panel on the Reform of EA supports this view.</p> <p>The OFWCA also raises concerns with the CNSC, in that the CNSC appears to listen to the "nuclear cheerleaders" who assert that radioactivity is natural and harmless, while appearing to ignore the public's concerns and opposition.</p>	
19.	Alternative Means of Carrying out the Project / Solutions de rechange pour réaliser le projet	<p><a href="#">Anna Bogic</a> (Feb.7, 2018 / 7 février 2018)</p> <p><a href="#">Bonnechere River Watershed Project</a> (Feb. 13, 2018 / 13 février 2018)</p> <p><a href="#">Joann McCann</a> (Feb. 12, 2018 / 12 février 2018)</p> <p><a href="#">Ria Heynen</a> (Feb. 11, 2018 / 11 février 2018)</p>	Section 4.2	<p><i>Concerns on this topic were expressed by more than one commenter, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p> <p>Various commenters emphasized the need for state-of-the-art facilities for storage of radioactive substances, and object to the use of entombment as a responsible waste management solution. Further, the commenters note that it is the responsibility of the CNSC to ensure that CNL is required to find a suitable design and location that ensures the safe, long-term care of long-lived radioactive wastes, conforms to IAEA standards, and does not contaminate the air or drinking water of Canadians (e.g., in geological caverns in stable rock away from water bodies).</p>	
20.	Public and Stakeholder Engagement / Mobilisation du public et des parties prenantes	<p><a href="#">William Turner</a> (Dec. 13, 2017 / 13 décembre 2018)</p> <p><a href="#">William Turner</a> (Feb. 9, 2018 / 9 février 2018)</p>	Section 6 (All/ Au complet)	<p>The Stakeholder Engagement TSD states: "Stakeholder engagement is a key element of the Environmental Assessment Process..."</p> <p>The commenter notes that a lack of acknowledgement of the comments received on the Project Description does not demonstrate this statement. Nowhere in the Stakeholder Engagement TSD could the commenter find any indication of CNL's acknowledgment of the public review phase in the EA process.</p> <p>The commenter is of the opinion that, because the comments received on the Project Description remain unaddressed, there is a non-compliance with</p>	

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				paragraph 19(1)(c) of CEAA 2012, which states: "The environmental assessment of a designated project must take into account the following factors: [...] comments from the public [...] that are received in accordance with this Act..."  The commenter also notes that it is not the responsibility of the public to identify issues such as this one, and finds that the CNSC is not addressing its responsibility with respect to paragraph 19(1)(c) of CEAA 2012.	
21.	Public and Stakeholder Engagement / Mobilisation du public et des parties prenantes	<a href="#">William Turner</a> (Feb. 9, 2018 / 9 février 2018)	Section 6 (All/ Au complet)	The commenter argues that CNL's use of TSDs, which are not included as part of the draft EIS, is an impediment to the public's access to critical information. The commenter claims that CNL is out of compliance with paragraph 4(1)(e) of CEAA 2012, which states: "The purposes of this Act are [...] to ensure that opportunities are provided for meaningful public participation during an environmental assessment..."  The commenter suggests that these omissions are deliberate and as such, they constitute an intentional decision to thwart any meaningful public review of the draft EIS.	
22.	Aboriginal Engagement / Mobilisation des autochtones	<a href="#">MNO</a> (Feb. 14, 2018 / 14 février 2018)	Section 7 (All / Au complet)	The MNO is concerned that the draft EIS lacks a fulsome consideration of MNO rights and interests in the project vicinity. The MNO recommends revisions to the draft EIS to ensure that effects on Métis rights are assessed and properly mitigated to allow for accurate and responsive accommodation discussions with CNL and the CNSC. The MNO also recommends having the opportunity to review and provide comment on the final EIS to ensure that the aforementioned is accomplished.  Furthermore, to ensure meaningful consultations occur, the MNO suggests developing and executing consultation/engagement protocols with both CNL and AECL. Additionally, if the CNSC continues to conduct procedural aspects of consultation, a consultation protocol with the CNSC should also be developed.	
23.	Aboriginal Engagement / Mobilisation des autochtones	<a href="#">Algonquins of Ontario (AOO)</a> (Feb. 26, 2018 / 26 février 2018)	Section 7 (All / Au complet)	The AOO explain that the NPD site is located within unceded Algonquin Traditional Territory, and therefore, that the AOO have asserted existing Aboriginal rights and title throughout the Settlement Area, including the NPD site. The AOO further clarifies that, at the time of the Crown decisions to establish and operate the NPD reactor in the unceded AOO Settlement Area, the Crown did not consult with the AOO, or provide accommodations for impacts to AOO rights and interests. The AOO indicates that it is time for CNL and the CNSC to formally acknowledge the use of the unceded Algonquin Settlement Area for the development of nuclear reactor technology, and as a site proposed for managing resulting radioactive waste materials. The NPD facility has significantly impacted the AOO through the displacement of their people, the loss of access for traditional purposes, the destruction of their cultural heritage	



**CNSC Table: Consolidated Public and Indigenous Groups' Comments on the Nuclear Power Demonstration (NPD) Closure Project Draft EIS**

**Tableau pour la CCSN: Commentaires consolidés du public et des groupes autochtones sur l'ébauche de l'EIE du Projet de fermeture du réacteur nucléaire de démonstration (RND)**

No.	Theme Thème	Source	Section, Table or Figure (Page) Section, tableau ou figure (no. de page)	<p align="center"><b>Comment Summary</b> (all original submissions can be found on the <a href="#">Canadian Environmental Assessment Registry, reference #80121</a>)</p> <p align="center"><b>Synthèse des commentaires</b> (toutes les soumissions originales se trouvent sur le <a href="#">Registre canadien d'évaluation environnementale, référence #80121</a>)</p>	<p align="center"><b>Response (to be completed by CNSC)</b>  <b>Réponse (à remplir par la CCSN)</b></p>
				<p>resources, and the release of radioactive and other hazardous materials into the environment.</p> <p>The AOO states that the CNSC, as an agent of the Crown, must uphold the requirements outlined within the <i>Consultation Process Interim Measures Agreement</i> to ensure the requirements of consultation are being adequately met, and ultimately, AOO rights and interests are protected or accommodated where necessary in relation to the NPD site.</p> <p>The AOO concludes that, at the current time, no formal accommodation agreement exists between the AOO and the CNSC, or the AOO and CNL. The results of the AOO's review provide a series of comments and accommodations that CNSC and CNL must consider prior to approval of the NPD Closure Project. The AOO indicate that they are engaged in parallel discussions with the CNSC regarding accommodations with various facilities for which the CNSC provides Crown regulatory oversight.</p> <p>[See p.60-61 for a high-level overview of the key accommodation measures identified by the AOO.]</p>	
24.	Releases to Surface Water / Rejets dans les eaux de surface	<p align="center"><a href="#">AANTC</a> (Feb. 13, 2018 / 13 février 2018)</p> <p align="center"><a href="#">Bonnechere River Watershed Project</a> (Feb. 13, 2018 / 13 février 2018)</p>	Section 8.3.3 (All / Au complet)	<p><i>Concerns on this topic were expressed by more than one commenter, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p> <p>The AANTC raises the following concerns:</p> <ul style="list-style-type: none"> <li>• There has been a decades-long and concerning practice of dumping batches of untreated contaminated water from the NPD facility into the Ottawa River. This practice, termed “surface water releases”, is discussed in Section 8.3.3 of the draft EIS. The AANTC recommends that CNL voluntarily discontinue this practice immediately.</li> <li>• Contaminated water which accumulates in the WAS during the Decommissioning Phase should not be simply dumped into the Ottawa River. The AANTC recommends that measures be implemented to allow the contaminated water to be collected and taken off-site for appropriate treatment.</li> <li>• The AANTC requests a full accounting and disclosure from CNL and/or CNSC about CNL's practices regarding liquid effluent releases from other facilities along the Ottawa River, including the CRL.</li> </ul> <p>The Bonnechere River Watershed project echoes these concerns and supports the above recommendations.</p>	
25.	Human Health – Tritium / Santé humaine –	<p align="center"><a href="#">CELA</a> (Feb. 13, 2018 / 13</p>	Section 8.8 (All / Au complet)	The commenter explains that critical views about tritium's official dosimetry	

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No.	Theme Thème	Source	Section, Table or Figure (Page) Section, tableau ou figure (no. de page)	<p align="center"><b>Comment Summary</b></p> (all original submissions can be found on the <a href="#">Canadian Environmental Assessment Registry, reference #80121</a> )  <p align="center"><b>Synthèse des commentaires</b></p> (toutes les soumissions originales se trouvent sur le <a href="#">Registre canadien d'évaluation environnementale, référence #80121</a> )	<p align="center"><b>Response (to be completed by CNSC)</b></p>  <p align="center"><b>Réponse (à remplir par la CCSN)</b></p>
	tritium	février 2018)		have existed for decades, that many scientists continue to express concerns about tritium's low dose factors and its acute radiotoxicity, and that official radiation protection precepts and procedures are deficient when it comes to determining tritium's hazards.  [Please see page 46 of the commenter's submission for the 4 points mentioned.]  The commenter concludes that current official models on tritium are unscientific and incorrect. The commenter suggests that recent discussions of tritium's hazards be acknowledged by radiation protection agencies in Canada and that a precautionary approach be adopted with the inhalation and ingestion dose factors for HTO (tritiated water) and OBT (Organically Bound Tritium) being increased by a factor of 20.	
26.	EA Follow-up Monitoring Program / Programme de suivi et de surveillance de l'EE	<a href="#">CELA</a> (Feb. 13, 2018 / 13 février 2018)	Section 12.6 (12-12)	This section of the draft EIS states: "Due to the conceptual nature of the NPD closure project at this point, further details of the follow-up program (e.g., statistical analyses and confidence, probable effect sizes) and schedule (e.g., timing, frequency, duration) will be developed at a later date according to the CNSC EIS guidelines..."  The commenter requests that the CNSC confirm whether the EA follow-up program, once developed "at a later date", will be open to the public for an opportunity to review and respond on sufficiency.  [Please refer to the commenter's submission (Information Request No. 29) for more information.]	