Additional Comments on NWMO's Initial Project Description for the Deep Geological Repository for Canada's Used Nuclear Fuel Project, IAAC registry reference number 88774.

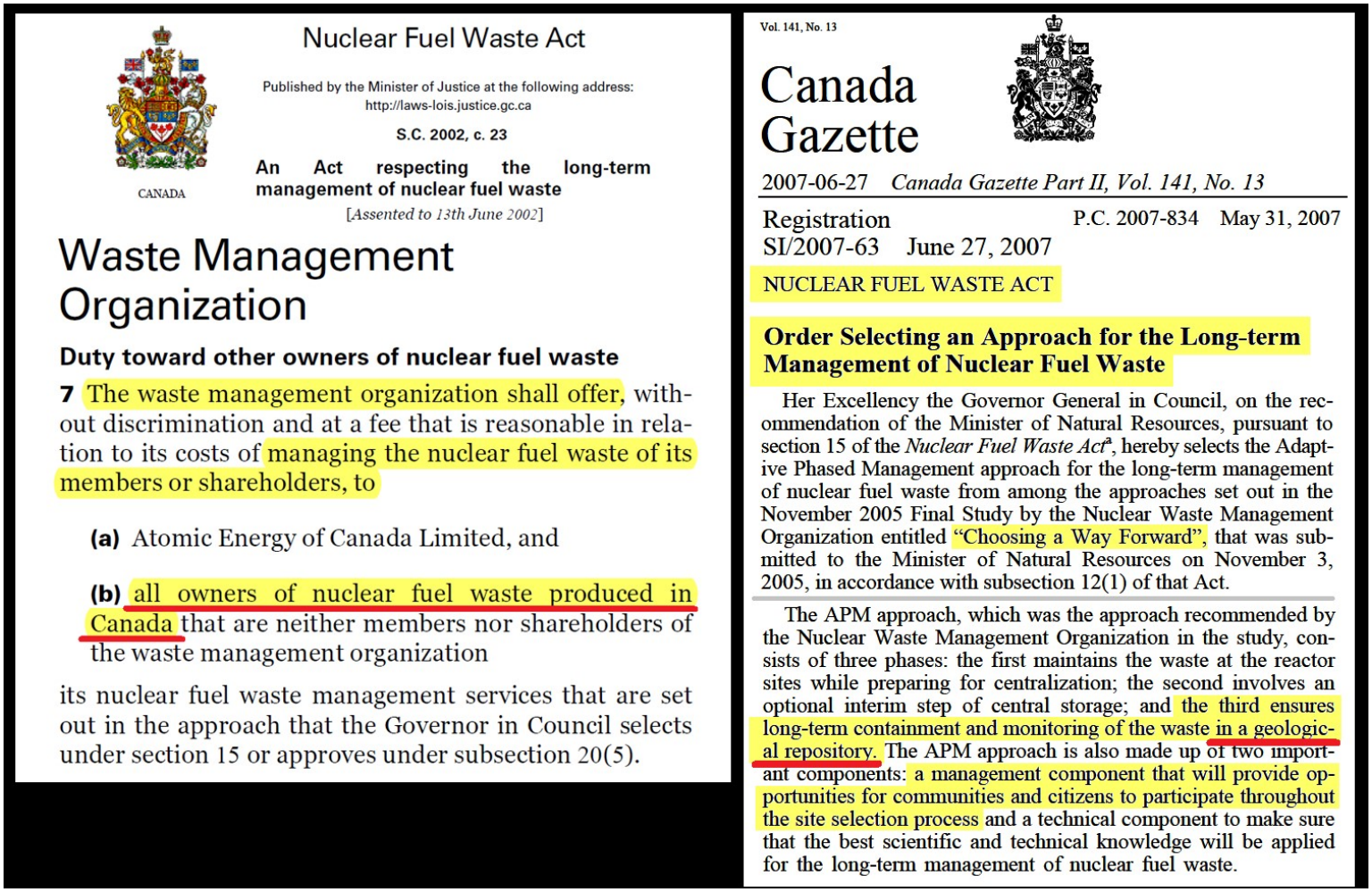
Jaro Franta, 10 January 2026

Thanks to the Impact Assessment Agency of Canada and the Canadian Nuclear Safety Commission for inviting comments on the Initial Project Description for the Deep Geological Repository for Canada's Used Nuclear Fuel Project, proposed by the Nuclear Waste Management Organization (the NWMO), per Canadian Impact Assessment Registry reference number 88774.

Opponents of Canada's national Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel, a project led by the Nuclear Waste Management Organization (NWMO), have latched on to the transportation issue, believing it to be their best chance of stopping or delaying the project, **despite NWMO's federal mandate, as per the Nuclear Fuel Waste Act** (NFWA, see clipping on next page).

The IAAC's invitation for comments on NWMO's IPD is in effect serving as another venue for a small activist group to conduct their misinformation campaign: The great majority of comments submitted to IAAC thus far (currently 21 total) are from WTNFN or their group members and associates.

IAAC should also be aware that WTNFN blocks discussion in other media: Comments posted on IAAC's website will be the first in several years that WTNFN are unable to block.



Nuclear Fuel Waste Act

Published by the Minister of Justice at the following address:
http://laws-lois.justice.gc.ca

S.C. 2002, c. 23

An Act respecting the long-term management of nuclear fuel waste

[*Assented to 13th June 2002*]

CANADA

Waste Management Organization

Duty toward other owners of nuclear fuel waste

7 The waste management organization shall offer, without discrimination and at a fee that is reasonable in relation to its costs of managing the nuclear fuel waste of its members or shareholders, to

(a) Atomic Energy of Canada Limited, and

(b) all owners of nuclear fuel waste produced in Canada that are neither members nor shareholders of the waste management organization

its nuclear fuel waste management services that are set out in the approach that the Governor in Council selects under section 15 or approves under subsection 20(5).

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NUCLEAR FUEL WASTE ACT

Order Selecting an Approach for the Long-term Management of Nuclear Fuel Waste

Her Excellency the Governor General in Council, on the recommendation of the Minister of Natural Resources, pursuant to section 15 of the *Nuclear Fuel Waste Act*[a], hereby selects the Adaptive Phased Management approach for the long-term management of nuclear fuel waste from among the approaches set out in the November 2005 Final Study by the Nuclear Waste Management Organization entitled "Choosing a Way Forward", that was submitted to the Minister of Natural Resources on November 3, 2005, in accordance with subsection 12(1) of that Act.

The APM approach, which was the approach recommended by the Nuclear Waste Management Organization in the study, consists of three phases: the first maintains the waste at the reactor sites while preparing for centralization; the second involves an optional interim step of central storage; and the third ensures long-term containment and monitoring of the waste in a geological repository. The APM approach is also made up of two important components: a management component that will provide opportunities for communities and citizens to participate throughout the site selection process and a technical component to make sure that the best scientific and technical knowledge will be applied for the long-term management of nuclear fuel waste.

In their recent comments to IAAC (Reference Number 22), WTNFN state that "*Every transportation corridor community must accept decades of shipments despite not having a role in choosing the site*" – implying that transportation must NOT be allowed without explicit consent of every transportation corridor community.

Such a demand amounts to insisting on granting veto power to every community in Canada, over transportation of anything and everything across Canada.

In reality, everyone in Canada does NOT get to veto the activities of everyone else: That is pretty much the definition of chaos, not representative democracy.

Wikipedia has some good articles on representative democracy, https://en.wikipedia.org/wiki/Representative_democracy, and in particular the deliberative type of representative democracy, https://en.wikipedia.org/wiki/Deliberative_democracy

Notably, the City of Thunder Bay Council considered the transportation issue, but in the end voted AGAINST adopting a stance opposing used nuclear fuel transport (TB News, https://youtu.be/udyd-sIcrfY?si=q-PSvGiJKhv-hVyy)

Aside from the political reality of democracies like Canada, WTNFN and other opponents of the DGR project have tried to portray the transport of used nuclear fuel, in certified transport casks and under transport license conditions, as something uniquely dangerous, as well as misrepresenting used nuclear fuel transport experience in other countries.

One of the leaders of WTNFN was reminded a few weeks ago, that the risks of certain types of hazmat transport, at least as concerns accident first responders' guidelines, may in fact be inferior to the risks of used nuclear fuel transport, which comprises solid materials that have withstood years of operation inside nuclear reactors at very high temperature, pressure and coolant flow rates, without any damage, and then many years of storage in pools of water, followed by decades of storage in dry casks.

Nuclear Free Thunder Bay's Post

Tanner Booth
Is this group also opposed to all the other dangerous goods that get trucked along these roads? Like propane, toluene, anhydrous ammonia, etc?

1w Like Reply 5

Wendy O'Connor
Tanner Booth If you stand near a truckload of those chemicals you mention, can you be harmed by them? And what is the result if they come out of containment and contaminate the ground or water? If you research the chemicals you mention, you'll quickly see why we in these groups are more concerned about used nuclear fuel waste.

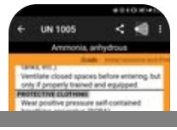
1w Like Reply 5

Tanner Booth
Wendy O'Connor note the evacuation distances listed in those screenshots. Those are taken from the 2024 Emergency Response Guidebook, which provides guidance to first repsponders when dealing with TDG emergencies, like a vehicle accident.

Multiple people have died in hockey rinks in recent years due to ammonia leaks.

1w Like Reply Edited

Tanner Booth
Wendy O'Connor ...



UN 1005

Ammonia, anhydrous

Guide Initial Isolation and Prot

tanks, etc.).
· Ventilate closed spaces before entering, but only if properly trained and equipped.

PROTECTIVE CLOTHING
· Wear positive pressure self-contained breathing apparatus (SCBA).
· Wear chemical protective clothing that is specifically recommended by the manufacturer **when there is NO RISK OF FIRE.**
· Structural firefighters' protective clothing provides thermal protection **but only limited chemical protection.**

EVACUATION
Immediate precautionary measure
· Isolate spill or leak area for at least 100 meters (330 feet) in all directions.
Spill
· For highlighted materials: see Protective Distance tab - Initial Isolation and Protective Action Distances.
· For non-highlighted materials: increase the immediate precautionary measure distance, in the downwind direction, as necessary.
Fire
· If tank, rail tank car or highway tank is involved in a fire, ISOLATE for 1600 meters (1 mile) in all directions; also, consider initial evacuation for 1600 meters (1 mile) in all directions.

EMERGENCY RESPONSE

UN 3331

Radioactive material, transported under special arrangement, fissile

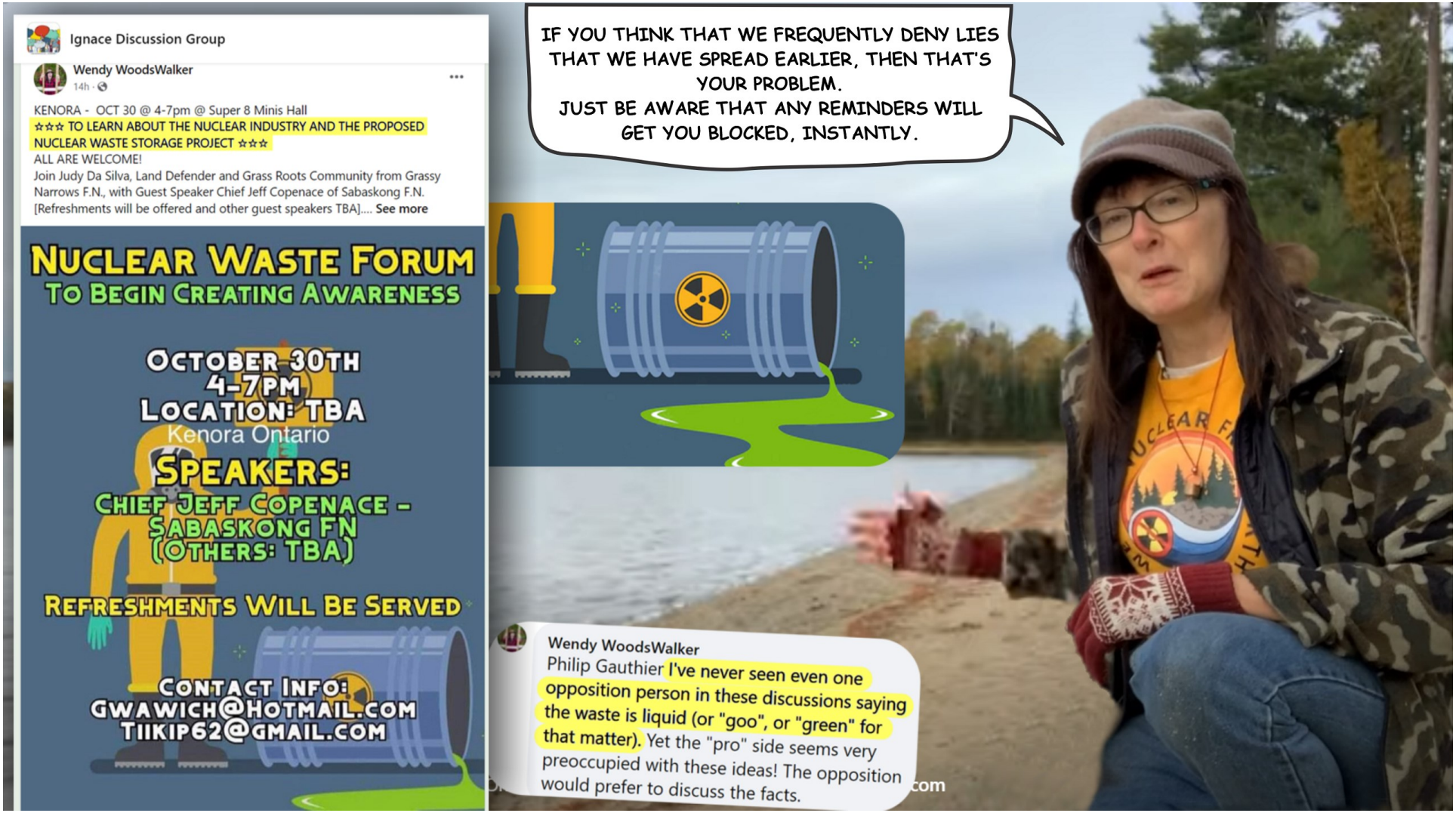
accident conditions. Radiation Authority is usually responsible for decisions about radiological consequences and closure of emergencies.
· Stay upwind, uphill and/or upstream.
· Keep unauthorized personnel away.
· Detain or isolate uninjured persons or equipment suspected to be contaminated; delay decontamination and cleanup until instructions are received from Radiation Authority.

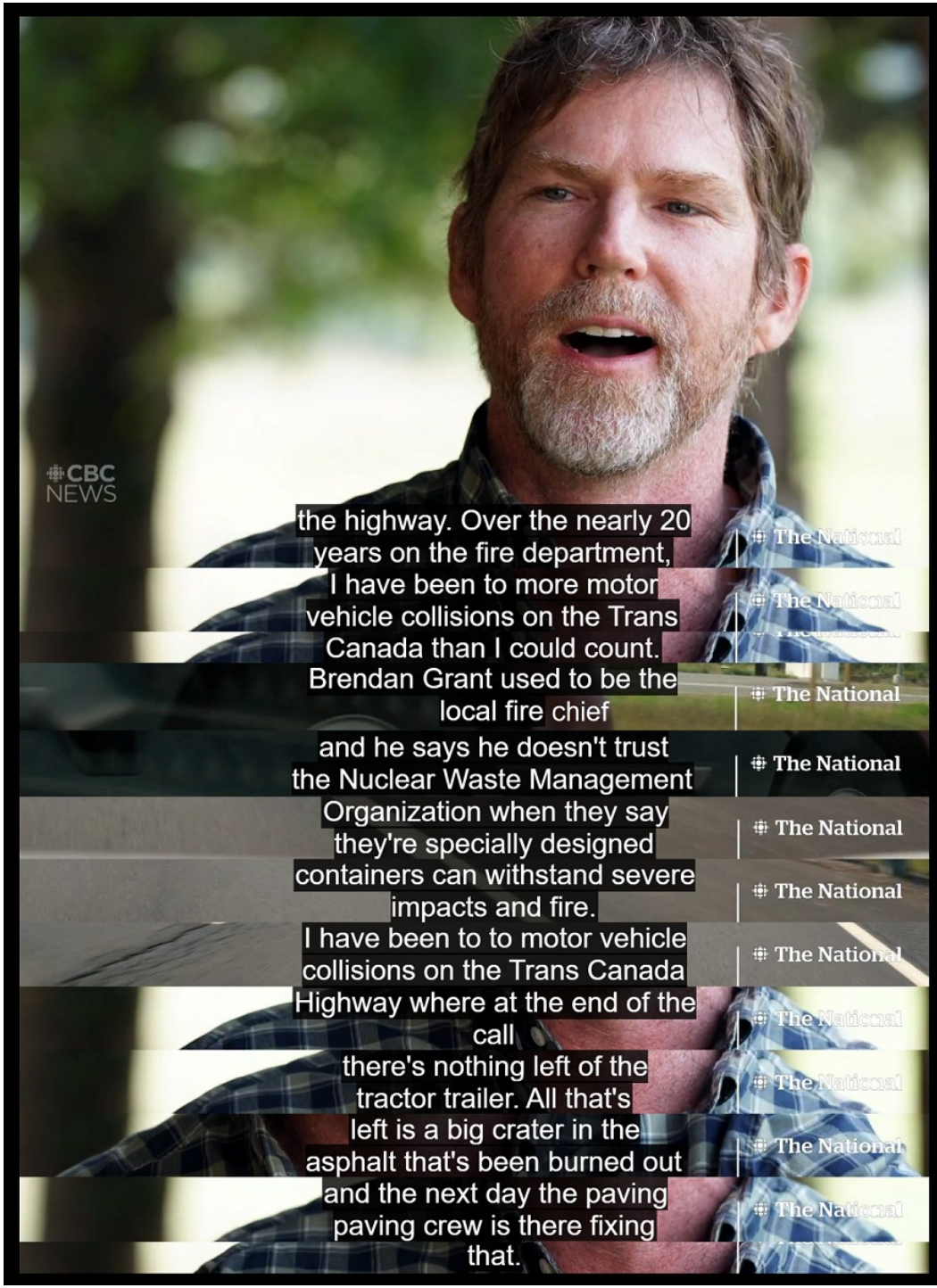
PROTECTIVE CLOTHING
· Positive pressure self-contained breathing apparatus (SCBA) and structural firefighters' protective clothing will provide adequate protection against internal radiation exposure, but not external radiation exposure.

EVACUATION
Immediate precautionary measure
· Isolate spill or leak area for at least 25 meters (75 feet) in all directions.
Large Spill
· Consider initial downwind evacuation for at least 100 meters (330 feet).
Fire
· When a large quantity of this material is involved in a major fire, consider an initial evacuation distance of 300 meters (1000 feet) in all directions.

EMERGENCY RESPONSE

WTNFN and other opponents of the DGR project are well aware of transportation of various sorts of hazmat across Ontario and Canada, but instead of helping the public to understand, they persist in spreading misinformation:


Ignace Discussion Group
Wendy WoodsWalker
14h ·
KENORA - OCT 30 @ 4-7pm @ Super 8 Minis Hall
☆☆☆ TO LEARN ABOUT THE NUCLEAR INDUSTRY AND THE PROPOSED NUCLEAR WASTE STORAGE PROJECT ☆☆☆
ALL ARE WELCOME!
Join Judy Da Silva, Land Defender and Grass Roots Community from Grassy Narrows F.N., with Guest Speaker Chief Jeff Copenace of Sabaskong F.N. [Refreshments will be offered and other guest speakers TBA].... See more
NUCLEAR WASTE FORUM
TO BEGIN CREATING AWARENESS
OCTOBER 30TH
4-7PM
LOCATION: TBA
Kenora Ontario
SPEAKERS:
CHIEF JEFF COPENACE - SABASKONG FN
(OTHERS: TBA)
REFRESHMENTS WILL BE SERVED
CONTACT INFO:
GWAWICH@HOTMAIL.COM
TIIKIP62@GMAIL.COM
IF YOU THINK THAT WE FREQUENTLY DENY LIES THAT WE HAVE SPREAD EARLIER, THEN THAT'S YOUR PROBLEM.
JUST BE AWARE THAT ANY REMINDERS WILL GET YOU BLOCKED, INSTANTLY.
Wendy WoodsWalker
Philip Gauthier I've never seen even one opposition person in these discussions saying the waste is liquid (or "goo", or "green" for that matter). Yet the "pro" side seems very preoccupied with these ideas! The opposition would prefer to discuss the facts.



Type B certified packages involved in an accident on the Trans-Canada Highway in 2001

No loss or release of radioactive content

CNSC CCSN

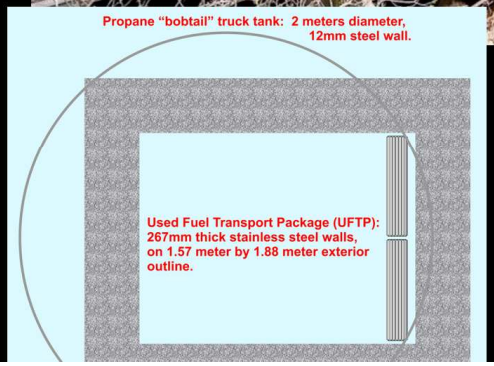
[This was a fatal, head-on truck collision]

Interesting graphic in WTNFN's latest post: Apparently they think – or at least want their groupies to think – that any highway truck crash equals automatic breach of the CNSC-certified used nuclear fuel transport cask.

We the Nuclear Free North
12h ·

Join us on Thursday, November 20th at 6 pm CST / 7 pm EST for an online update about the nuclear industry's plan for northern Ontario. Register at https://tinyurl.com/2f7r98ce.

"SODIUM CYANIDE" (trailer recovery after highway accident)



As noted earlier, some DGR opponents attempt to misrepresent used nuclear fuel transport experience in other countries.

For example, in Peter C. van Wyck's comments to the IAAC, Reference Number: 11

The case of Sweden (which he cites along with Finland) is an excellent example.

Van Wyck makes it sound like Sweden will only start transporting used nuclear fuel across the country once their national DGR at Forsmark is built and operated (they started construction almost exactly one year ago, after gaining the necessary approvals).

That's quite a spin, considering that Sweden has been transporting used nuclear fuel from all of their nuclear power plants to a national central storage site, named CLAB, for decades.

In fact CLAB went into operation in 1985, with used nuclear fuel stored in pools built 30 meters underground.

Check out the nice video of CLAB at https://www.youtube.com/watch?v=OBZFZ6w_N2Q

In essence, all that transport of used nuclear fuel across Sweden to CLAB is the equivalent of Canada transporting our used nuclear fuel to NWMO's DGR at the Revell site – the difference being that CLAB is an interim storage site, whereas the Revell DGR will be a permanent repository, at about 24 times greater depth.

It's as if Canada had been transporting our used nuclear fuel to a central site for the past 40 years, instead of STARTING in about 17 years, and continuing for 50 thereafter.

Incidentally, several other countries with nuclear power plants use centralized interim used nuclear fuel storage, in various forms, pending development of their own DGRs.

Obviously, they too practice transporting of their used nuclear fuel to a central site, and have been doing so for decades.

Dr. van Wyck, the communications prof, evidently likes to practice his skills by putting a misleading spin on used nuclear fuel practices and experience in other countries. The case of Sweden (which he cites along with Finland) is an excellent example. Van Wyck makes it sound like Sweden will only start transporting used nuclear fuel across the country once their national DGR at Forsmark is built and operated (they started construction almost exactly one year ago, after gaining the necessary approvals). That's quite a spin, considering that Sweden has been transporting used nuclear fuel from all of their nuclear power plants to a national central storage site, named CLAB, for decades. In fact CLAB went into operation in 1985.

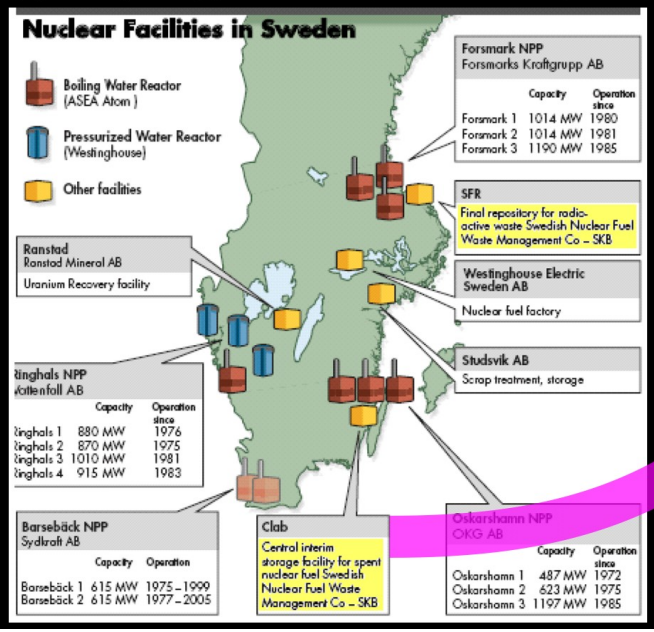
Comment on the Initial Project Description for the NWMO Deep Geological Repository – On the treatment of Transportation of Used Nuclear Fuel

Dr. Peter C. van Wyck
Professor of Communication Studies
Concordia University, Montréal
January 6, 2026

International precedent: Posiva (Finland) and SKB (Sweden)

Comparable international deep geological repository projects provide clear precedent for treating transportation as an integral component of the repository project for the purposes of environmental assessment.

Similarly, in Sweden, SKB's environmental assessment and licensing process for the Forsmark repository integrated transportation from interim storage facilities to the repository as a linked system. Rail and sea transport corridors were explicitly identified, risks were assessed in relation to real transport geographies, and public engagement extended beyond the host community to



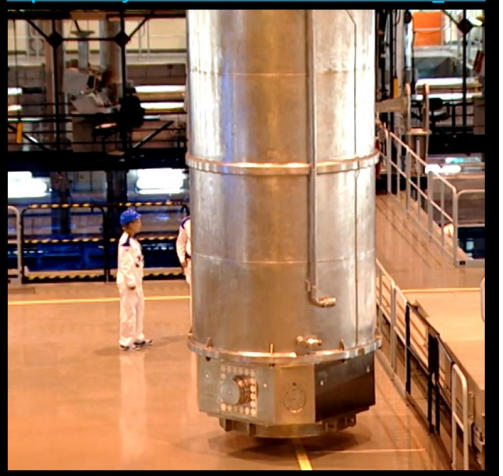
WIKIPEDIA
The Free Encyclopedia

Clab

The **Clab**, also known as *Centralt mellanlager för använt kärnbränsle* (Swedish for 'Central holding storage for spent nuclear fuel'), is an interim radioactive waste repository located at Oskarshamn Nuclear Power Plant[1] about 25 km north of Oskarshamn. Clab used to be owned by Oskarshamnsverkets Kraftgrupp AB (OKG) but is now owned by Svensk Kärnbränslehantering Aktiebolag (SKB). It was opened in 1985 for the storage of spent nuclear fuel from all Swedish nuclear power plants. The fuel is stored for 30 to 40 years, in preparation for final storage.

The facility currently contains approximately 7,300 tons of high-level waste, submerged in 8 meters of water, in pools 30 meters below

https://www.youtube.com/watch?v=OBZFZ6w_N2Q



https://www.youtube.com/watch?v=OBZFZ6w_N2Q

Van Wyck doesn’t explain why hazmat transport rules should suddenly change for NWMO, when they have been in effect for decades, across Canada.

Nor does van Wyck say why he didn't object to the six-month campaign by AECL / CNL to transport all of the used nuclear fuel from his home province of Quebec to Chalk River, Ontario: was that just an unfortunate oversight, or is van Wyck being massively hypocritical?

Comment on the Initial Project Description for the NWMO Deep Geological Repository – On the treatment of Transportation of Used Nuclear Fuel

Dr. Peter C. van Wyck
Professor of Communication Studies
Concordia University, Montréal
January 6, 2026

This comment concerns the treatment of transportation in the Initial Project Description (IPD) for the proposed Deep Geological Repository (DGR) for Canada's used nuclear fuel.

The IPD states that transportation of used nuclear fuel from reactor sites to the repository is n included within the scope of the Project, beyond primary and secondary access roads at the Project site, on the basis that transportation is regulated separately by the Canadian Nuclear Safety Commission (CNSC) and uses existing infrastructure. While this position may reflect existing regulatory practice with respect to package certification and transport licensing, it rai substantive concerns regarding whether all reasonably foreseeable effects of the Project have b appropriately scoped under the Impact Assessment Act (IAA).

Transportation as an integral component of the Project

Transportation is not an ancillary or optional activity. It is a necessary, long-duration, and geographically distributed component of the Project, without which the DGR cannot functio Over the operational life of the facility, transportation will involve the repeated movement of nuclear fuel from multiple reactor sites across Canada to a single repository location, potentia over several decades. This activity is therefore not incidental to the Project but constitutive of

By excluding transportation from the Project scope, the IPD effectively treats transportation a solved technical matter rather than as a system of activities with spatial, social, cultural, and environmental dimensions. The reliance on CNSC-certified transportation packages, while important for demonstrating container integrity and radiological protection, does not address broader effects associated with transport corridors, cumulative shipment volumes, emergency preparedness across diverse jurisdictions, or impacts on communities and Indigenous Nations located far from the repository site.

Regulatory separation versus assessment completeness

The IPD repeatedly points to separate CNSC regulation and certification of transportation packages as justification for excluding transportation from the Project description. However, certification and licensing address how transportation is conducted at a technical level; they d not address where, how often, over what time frame, or with what cumulative effects transportation will occur. These latter questions fall squarely within the purposes of impact assessment.

Looks like Dr. van Wyck, the communications prof, needs to communicate better: NWMO did NOT decide Canadian policy on used nuclear fuel transport, the federal government and its regulatory authorities did. Much as he would love to block NWMO's project - van Wyck is an old buddy of Gordon Edwards - he doesn't explain why the rules should suddenly change for NWMO, when they have been in effect for decades, across Canada. Nor does van Wyck say why he didn't object to the six-month campaign by CNL to transport all of the used nuclear fuel from his home province of Quebec to Chalk River, Ontario: was that just an unfortunate oversight, or is van Wyck being massively hypocritical?

GENTILLY-1 FUEL CONSOLIDATION PROJECT COMPLETED

CNL has successfully removed the entire inventory (65 tonnes) of used nuclear fuel from the Gentilly-1 Waste Management Facility (G1WF) in Quebec and transferred it to Chalk River Laboratories (CRL) for centralized storage. The operational phase of the project required the retrieval of 3,213 used fuel bundles and shipping 44 transportation casks in just over six months. Completing this project advanced CNL's broader used fuel management strategy and was a significant step to enable the decommissioning of the G1 site.

The preparation, packaging and transport of the used fuel was carried out safely and efficiently and brought together expertise from across CNL. Prior to commencing the work, CNL shared information about the robust safety, security, and emergency preparedness measures in place with federal, provincial and regional stakeholders, and with Indigenous Nations, communities and organizations.

"The efficient and safe completion of this important project reflects the deep expertise CNL has developed through years of complex, technical work in nuclear material management," said Mark Chapman, senior director of the Fuel Program. "The project required detailed planning and coordination, including the development of specialized fuel-handling systems, and enhancements to storage infrastructure at CRL."

As outlined in CNL's comprehensive Integrated Waste Strategy, the fuel is now securely stored in modern purpose-built canisters at the Chalk River Laboratories – where it will remain until the Nuclear Waste Management Organization's planned long-term disposal facility for used nuclear fuel becomes available. CNL's strategy is aligned with Canada's national policy to reduce the number of waste sites by centralizing the safe and secure storage of fuel waste.