

January 27, 2026

Thank you for the opportunity to provide feedback on the [Initial Project Description](#) (IPD) for the [Deep Geological Repository for Canada's Used Nuclear Fuel Project](#). Collectively, we have been practicing, studying and participating in impact assessment for more than sixty years. We have had incredible opportunities to participate in project- and regional assessments across Canada, and internationally. We have also been actively engaged in the development of new- and the revision of older assessment legislation and guidance.

In our experience the IPD for Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project, submitted by the Nuclear Waste Management Organization (NWMO) is the epitome of a project that requires a full assessment including public hearings. We support the active application of the federal impact assessment, and the project being referred to an integrated panel review, as per s. 43 of the Act for the reasons laid out below.

Globally a DGR for high-level radioactive waste has never been tested. Yes, some European countries (e.g., Finland, Sweden) are in the process of reviewing license applications for potential facilities, but to date there are no operational facilities, and the supporting technologies have not been tested, in fact some of the key project components in the NWMO IPD are still in the design and development stage (e.g., [annual technical reports](#)). Indeed an earlier effort by The Agency to assess a [DGR](#) was terminated at the request of the proponent. There is absolutely no best practice concept – no proven safe approach. This is exactly the sort of situation that requires very careful forward-looking consideration for which Impact Assessment was intended; it is, in fact, a post-child for a rigorous, transparent review.

The potential for very grave environmental impacts that could occur within areas of federal jurisdiction – or responsibility are established in the IPD. These include, but are not limited to:

- Impacts on fish and fish habitat, species and risk and migratory birds. There will be releases from the facility into the air even if there is not a failure or accident and it has in no way been shown in the IPD that these releases do not pose a significant risk. These will occur through air exchange from the underground facility and the consolidation of the waste for shipment at the used fuel package plant (UFPP). The establishment, operation and associated releases from the UFPP are in no way sufficiently described in the IPD. The outcomes of a large release would of course be highly consequential and response to such an event has not been adequately established in the IPD.
- The potential for serious social and economic impacts on Indigenous people in the region and on their treaty lands. We extend this as well to all Canadian's particularly since the IPD does not include a business plan for the development and ongoing operations of the facility.
- The significant public interest among local communities next to and downstream from the potential site and along its transportation route. Many of these communities and the individuals living in them have serious concerns about the facility, and also hold local knowledge, both of which need to be carefully collected through assessment and duly considered before any decisions about the project and approach to mitigation, if it should proceed, are made.



- The high potential for the facility to encourage the development of new nuclear reactors and to receive waste from existing facilities in other jurisdictions. This is captured in the well-known assessment concept of “build it and they will come”, which has been ignored in the IPD. There is little doubt that planned nuclear development in Alberta will look to this facility.
- The almost complete lack of consideration of reasonable alternatives in the IPD. An assessment would assure that not just need for but also alternatives to and alternatives means would be fully consider. On this point, we support Recommendation 8 from the [Assembly of First Nations](#), who “strongly urges the NWMO to publish a transparent document outlining alternative methods for nuclear waste storage that were considered, along with detailed information and evidence explaining why each alternative method was ruled out.”
- The exclusion from the IPD of transportation of nuclear waste thousands of kilometers from point to generation to the disposal facility. The IPD argues this key valued component should be excluded from the assessment because:

activities [within the transportation corridor] are ongoing, independently regulated, would not require changes to federal or provincially approved design standards for existing highways and railways and these activities are expected to continue regardless of the Project’s implementation.”

This is a gaping lacuna in the IPD, and clearly a central issue of concern for people along the transportation route, as is the failure of the NWMO to consult along the route. See also the submission by the [Assembly of First Nations](#) and the [Town of Kapuskasing](#), among others.

We offer these comments on the premise that the review process outlined in the IPD will be followed in that; “The Project will undergo an integrated impact assessment and initial license application under the Impact Assessment Act (IAA) and the Nuclear Safety and Control Act (NSCA), consistent with the Government of Canada’s objective of “one project, one assessment,” thereby discharging both federal assessment and lifecycle regulator requirements in a single, coordinated process.” (p.1)

And that the process will include a public hearing adjudicated by panel members “unbiased and free from any conflict of interest relative to the project” (s. 44(2) of the Act) to achieve the promise of impact assessment, namely:

striving to remove any perceived notion of bias on the part of Responsible Authorities; Maximizing the benefits of a planning-focused IA; Instilling co-operation and consensus as a governance philosophy; and ensuring that IA delivers transparent, evidence-based decisions. First and foremost to the goal of restoring trust and confidence in the process is a belief that the authority conducting the assessment is free from bias and conflicts of interest ([Experts Panel for the review of Environmental Assessment Processes](#), p.50).

As established in the IPD, and our related comments, it is clear that this project meets the IAA’s definition of *designated project* as set out in the legislation and the associated Physical Activities Regulations (SOR/2019-285).

As such, the Minister has an obligation to refer it to a review panel, which we expect will include public hearings.

We encourage the subsequent panel to expand the scope of the assessment to address the full list of factors to be considered in the review (e.g., s.22 of the Act and comments received as part of this engagement including those submitted via this letter), prioritizing areas of particular concern to experts, Nations, governments and the public.

Sincerely,

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