

February 2, 2026

Dear IAAC, Minister Dabrusin and Minister Hodgson,

I am writing to express my great concerns about the Deep Geological Repository (DGR) in northwestern Ontario proposed by the Nuclear Waste Management Organization (NWMO). It is apparent that the proposed project aims to advance nuclear energy expansionism in Canada, with framing about the “need” for the project as a political statement rather than providing an accurate depiction. I strongly oppose the expansionist approach that the project will enable. What is critically needed in contrast, is a rapid shift to renewable energy and action to phase out all nuclear energy. The increasing narrative that nuclear energy is a solution to climate change being promoted by the nuclear industry and its supporters is false^{1,2} and should not be a consideration in the expansionist approach.

As currently proposed by the NWMO, the project would see the long-distance transport and management of high-level radioactive waste from nuclear reactors in Ontario, Quebec, Manitoba and New Brunswick over a period of up to 50 years to the proposed site. If approved, it is also highly likely that the project would encourage additional waste to be transported in the future from other nuclear production sites in Canada as well as eventually from the U.S. and ultimately from overseas. This project hence would enable an immeasurably dangerous direction that should not be supported.

The proposal ignores Indigenous rights and risks to the hundreds of communities (both Indigenous and municipal) along the proposed transport routes to move the most toxic, long-lived form of waste that has been generated to date on the planet, across unceded and Treaty lands. The risk that would be associated with such transport is extreme and entirely unacceptable. I live in Thunder Bay, not far from the TransCanada highway that is a key transportation corridor proposed for the project. As such, I would be directly affected by this project should it proceed.

For the many reasons of great concern I have conveyed, it is crucial that the proposed project undergoes a full impact assessment that involves the highest level of public scrutiny. Furthermore, a greatly enhanced Project Description is required, given that the initial version released by the NWMO omits or provides inadequate details for many critically elements and proposed activities. Such an enhanced project description is necessary to enable a cumulative review of all potential impacts with an approach that prevents, rather than perpetuates, environmental injustice and inter-generational burdens.

Enhanced Project Description must address the following items:

- ***Transport of nuclear waste*** on all proposed routes and the associated risk must be an integral component of the project’s review. The Initial Project Description indicates that transportation to the project site is excluded from the project scope (given that transportation risk will be addressed by existing regulations). This is both illogical and dangerous, as transporting the waste itself is an unavoidable and necessary component of the project and is proposed to be carried

¹ Wickramasinghe, S. (2024). Why nuclear energy is not the solution to the climate crisis.
<https://news.ubc.ca/2024/07/why-nuclear-energy-is-not-the-solution-to-the-climate-crisis/>

² Ramana, M.V. (2024). Nuclear is not the solution: The folly of atomic power in the age of climate change. Verso.
[Dr. Ramana is Simons Chair in Global Disarmament and Human Security at the [school of public policy and global affairs](#) at the University of British Columbia]

out daily for 50 years on major public roads, posing immediate and ongoing risks to communities along the routes. Any attempt to exclude transportation from an IA creates a misleading picture of the project's true impacts and shields core decisions about transport routes, accident risks, and emergency preparedness from public scrutiny. This is a project that inherently spans many provinces, Nations and communities and their respective rights.

- **Alternatives:** A thorough discussion is required about alternatives to the proposed project, with a top priority being to avoid the many risks associated with the long-distance transportation of highly toxic nuclear waste from production sites. The key alternative that must be included to discuss maintaining the waste at the production sites in new facilities that are robust.
- **Used fuel packaging, containers for long-term storage, underground storage chamber:** explicit details about all aspects of these are required.
- **Water management:** the description must include potential radiological contamination.
- **Health:** risks and impacts of radiological exposure, occupational health and safety issues for all workers at the proposed DGR site and those involved in waste packaging and transportation.
- **Climate change:** greenhouse gas emissions from long-term transportation of nuclear waste must be addressed in addition to emissions from all proposed activities over the period of the project. Climate considerations must be considered as one aspect of cumulative impacts from the project, in addition to all other proposed activities.
- **Accidents and emergency management:** approaches must be thoroughly described.
- **Monitoring:** adequate details for all stages of the project are needed

Respect and uphold UNDRIP and its principles, including Free, Prior and Informed Consent (FPIC):

The NWMO makes repeated reference to "reconciliation" in their project documents. However, such references adopt a diminished and inadequate perspective that falls far short of recognizing and upholding Canada's commitments to the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP), including through implementation of the Canadian *United Nations Declaration on the Rights of Indigenous Peoples Act*.

The *Impact Assessment Act* (IAA) was developed with consideration of UNDRIP such that its implementation is hardwired into the IAA's processes and decision-making approaches. For example, the IAA requires consideration of Indigenous rights and Indigenous knowledge and reaffirms Canada's commitment to seek FPIC of Indigenous peoples related to all decisions under the IAA.

A federal IA is critical to provide a clear pathway to ensure Indigenous peoples' constitutional and Treaty rights will be respected and that a credible forum is provided for impacted rights holders to be consulted and engaged in accordance with their traditional laws and protocols.

Environmental justice must be supported through project transparency and accountability

Canada is now facing the consequences of decades of decisions about nuclear energy production that have failed to meaningfully examine end-of-life realities, with the fate of 5.9 million fuel bundles of high-level radioactive waste raising serious concerns of ongoing social and environmental risk.

The IA for the project must apply an environmental justice lens throughout, including an analysis of the effects of the proposed development on Canada's responsibility to advance environmental justice and to

assess, prevent and address environmental per the *National Strategy Respecting Environmental Racism and Environmental Justice Act*.

Upholding environmental justice means ensuring the fair treatment and meaningful involvement of all people in environmental decision-making, especially when decisions may impact health, safety, and the environment. Furthermore, proceeding with the project without an IA would perpetuate environmental racism against Indigenous peoples who have historically borne the brunt of environmental harms and continue to be excluded from decision-making processes. A most poignant example is Grassy Narrows First Nation (GNFN) that has already been seriously and negatively impacted by mercury poisoning from past inadequately regulated pulp and paper production and has a strong likelihood of additional negative impacts from the proposed DGR in proximity to GNFN's traditional territory.

An impact assessment is uniquely positioned to uphold environmental rights by providing a forum where NWMO's claims of safety, environmental risk and level of impact can be tested and publicly justified.

In closing, I reiterate the requirement for a full impact assessment of the proposed DGR project that:

1. Includes an enhanced project description that includes nuclear waste transportation routes and risks and the addition items noted;
2. Recognizes and upholds Indigenous rights, including FPIC obligations as set out in UNDRIP and required under the 2021 Canada UNDRIP Act; and
3. Upholds environmental justice, including the rights of impacted communities along the proposed route to be informed and have a say.

I once again stress the urgent need to shift away from the nuclear expansionist direction that this proposal would enable and instead take strong action toward development of renewable energy to support a transformation to a sustainable future.

I look forward to your attention to my concerns and recommendations.

Sincerely,

Dr. Lynn Palmer
PhD Forest Sciences

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