Recommendations for Working Groups and Impact Assessment from Melgund Township

Target Group	Milestone Phase	Priority	Task Description	Strategic Rationale	Source Section
Human Environment (People)	VCs	High	Challenge the Proponent's use of 'illustrative economic regions' in their socio-economic assessment and request a gap analysis comparing these generic models against the specific unorganized status of Melgund Township.	The Proponent's submission notes that assessments relied on 'illustrative economic regions' to model impacts. Melgund Township (Dyment/Borups Corners) is an unorganized territory with no municipal structure, no tax base, and zero local services. Generic economic models often assume the existence of municipal infrastructure and support systems that simply do not exist here. Relying on 'illustrative' data risks vastly underestimating the strain on the community. By demanding a comparison against the actual local baseline, the Board can force the Proponent to acknowledge that standard mitigation strategies (like 'funding local departments') are impossible where no such departments exist, thereby setting the stage for required self-sufficiency.	12.1.3.2 PROCESS OF COLLABORATIVE DEVELOPMENT WITH THE CANADIAN PUBLIC AND INDIGENOUS PEOPLES Phase 2—Exploring the Fundamental Issues Phase 3—Evaluating Management Approaches
Human Environment (People)	Effects Assessment	High	In response to the Proponent's request for 'specific elements... built into an implementation plan,' formally mandate that '100% Proponent-supplied Emergency Services' be listed as a critical project requirement.	The text explicitly asks stakeholders to identify elements for the implementation plan. This is a strategic opportunity to lock in safety requirements early. Since Melgund has zero local emergency capacity (no fire, police, or ambulance), the implementation plan cannot rely on 'coordination' or 'support' for existing services. The rationale must be clear: reliance on distant regional hubs (Ignace/Dryden) creates unacceptable response times for a high-risk industrial project. The Proponent must demonstrate total self-sufficiency in emergency response to ensure the safety of residents in Dyment and Borups Corners.	12.1.3.2 PROCESS OF COLLABORATIVE DEVELOPMENT WITH THE CANADIAN PUBLIC AND INDIGENOUS PEOPLES Phase 2—Exploring the Fundamental Issues Phase 3—Evaluating Management Approaches
Environment	VCs	Medium	Request the specific technical methodologies used for the 'formal quantification of risk' mentioned in the submission, specifically asking how generic 'management approaches' were adapted to account for local site-specific conditions.	The submission states that specialists conducted a 'formal quantification of risk' on management approaches. However, if this quantification was paired with 'illustrative' regions rather than site-specific geological and hydrological data, the resulting risk profile may be invalid for the Revell site. The Environment Working Group must verify that the risk models account for the specific water table, soil composition, and drainage patterns of the local area. If the risk was quantified using generic assumptions, the Proponent must be required to re-calculate risk using local baseline data to ensure the protection of local land and water resources.	12.1.3.2 PROCESS OF COLLABORATIVE DEVELOPMENT WITH THE CANADIAN PUBLIC AND INDIGENOUS PEOPLES Phase 2—Exploring the Fundamental Issues Phase 3—Evaluating Management Approaches
Human Environment (People)	Baseline	Medium	Request an updated 'Social Acceptability' baseline that specifically surveys current Melgund residents, rather than relying on the Phase 4 workshops which prioritized those 'involved in earlier phases'.	The Proponent's submission claims the project is 'most socially acceptable' based on dialogue with groups 'who had been involved in earlier phases.' This methodology risks excluding newer residents or those in Dyment and Borups Corners who may not have participated years ago but are now facing the reality of site selection. To ensure the 'Social Acceptability' claim is valid for the actual host area, the Board must demand a fresh baseline assessment that captures the current sentiment of the unorganized territory's population, ensuring that the 'values-driven process' cited in the text reflects the people actually living there today.	12.1.3.2 PROCESS OF COLLABORATIVE DEVELOPMENT WITH THE CANADIAN PUBLIC AND INDIGENOUS PEOPLES Phase 4—Finalizing the Study ReportGeneral
Human Environment (People)	Alternatives	High	Require an analysis of 'Access road alignments' (Table 12.5, Item 1) that specifically models impacts on emergency response times from regional hubs (Ignace/Dryden) to Melgund.	The Proponent's submission notes that primary and secondary road alignments are under consideration. Since Melgund lacks local emergency services, survival outcomes for residents in the event of fire or medical emergency are dictated entirely by travel time from regional hubs. Any road alignment or construction traffic that impedes Highway 17 or local arteries directly threatens this lifeline. By forcing the Proponent to evaluate road options based on 'emergency response latency,' the Board ensures that the selected alternative does not inadvertently sever the community from essential life-saving services.	12.1.3.2 PROCESS OF COLLABORATIVE DEVELOPMENT WITH THE CANADIAN PUBLIC AND INDIGENOUS PEOPLES Phase 4—Finalizing the Study ReportGeneral
Human Environment (People)	Alternatives	High	Challenge the Proponent to demonstrate 100% self-sufficiency for emergency services regarding the 'Accommodation camps' (Table 12.5, Item 10), explicitly ruling out reliance on local capacity.	The Initial Project Description lists 'Accommodation camps' as an alternative mean but fails to address the service vacuum in Melgund. As an unorganized territory, Melgund has zero local police, fire, or ambulance services; residents rely on distant response from Ignace or Dryden. The introduction of a temporary or permanent camp population creates a significant safety risk that the community cannot manage. The Proponent must prove that their camp design includes fully independent security, fire, and medical capabilities so that the influx of workers does not dilute the already thin emergency coverage available to existing residents. This is a critical gap that must be closed before site selection is finalized.	12.1.3.2 PROCESS OF COLLABORATIVE DEVELOPMENT WITH THE CANADIAN PUBLIC AND INDIGENOUS PEOPLES Phase 4—Finalizing the Study ReportGeneral
Environment	Alternatives	High	Request a comparative hydrogeological analysis for the 'Source of water supply' and 'Water Discharge' options listed in Table 12.5 (Items 4 and 5), specifically evaluating risks to private wells in Dyment and Borups Corners.	The Proponent's submission identifies 'Options for using surface water or groundwater' as a preliminary alternative mean. In the unorganized territory of Melgund, residents rely exclusively on private wells and local surface water for potable use. There is no municipal backup. It is critical to establish early in the Alternatives phase whether the Proponent's industrial water draw will depress the local water table or if effluent discharge will impact the watershed used by locals. This recommendation ensures that the final design selection prioritizes the protection of the existing local water security, preventing potential litigation or public health crises down the line.	12.1.3.2 PROCESS OF COLLABORATIVE DEVELOPMENT WITH THE CANADIAN PUBLIC AND INDIGENOUS PEOPLES Phase 4—Finalizing the Study ReportGeneral
Human Environment (People)	Effects Assessment	High	Challenge the Proponent's citation of 'transportation safety' as a selection factor by demanding a gap analysis of emergency response times to the proposed Primary and Secondary Access Roads.	The Proponent's submission lists 'transportation safety' as a justification for the site and provides coordinates for access roads intersecting Highway 17. However, Melgund Township is an unorganized territory with zero local emergency services (no fire, ambulance, or police). Reliance on distant response from Ignace (43 km) or Dryden (40 km) creates an unacceptable risk profile for accidents involving project traffic. The Proponent must be challenged to demonstrate 100% self-sufficiency for emergency response at these access points, rather than burdening a community with no capacity.	C. LOCATION INFORMATION AND CONTEXT
Human Environment (People)	Baseline	High	Require the disaggregation of socio-economic baseline data to specifically isolate Borups Corners and Dyment as distinct receptors, separate from the Township of Ignace.	The Initial Project Description explicitly states that Borups Corners (10 km) and Dyment (13 km) are the closest communities to the project, significantly closer than the 'willing' Township of Ignace (43 km). Grouping Melgund residents with distant municipalities in baseline studies will dilute the data regarding potential impacts. Establishing a specific baseline for these immediate neighbors is critical to accurately measuring future impacts on property values, social cohesion, and community well-being that are unique to the unorganized territory.	C. LOCATION INFORMATION AND CONTEXT
Environment	Baseline	High	Mandate a baseline noise, vibration, and light pollution study specifically at the coordinates of the nearest residents in Borups Corners and Dyment.	The Proponent's submission provides specific coordinates for the 'ERMA' and access roads, which are only 10-13 km from Melgund communities. To ensure the 'Environment' assessment is valid, the current background levels of silence and darkness—key characteristics of the local rural lifestyle—must be documented at these specific receptor locations before any site preparation or land transfer occurs. This data is essential to hold the Proponent accountable for future nuisances.	C. LOCATION INFORMATION AND CONTEXT
Environment	VCs	Medium	Designate 'Forestry Land Base' as a Valued Component and request a quantitative assessment of the impact of the 17,600 ha withdrawal on the Wabigoon and Dryden Forest Management Units.	The text confirms the project is located within active Forest Management Units and involves a significant withdrawal of Crown land. This removal of land from the inventory directly affects the local environment and economic potential of the area surrounding Melgund. By designating this as a Valued Component, the community ensures that the loss of access to these lands for traditional, recreational, or economic purposes is rigorously assessed and not merely treated as an administrative transfer.	C. LOCATION INFORMATION AND CONTEXT

Human Environment (People)	Effects Assessment	High	Require a specific assessment of how the 'extreme temperatures' (-43°C) and '175 cm of snowfall' cited in the text impact emergency response times from distant hubs (Ignace/Dryden) to the Project site and Melgund Township.	The Proponent's text explicitly cites severe winter conditions, including lows of -43°C and heavy snowfall. Melgund Township is an unorganized territory with zero local emergency services (no fire, ambulance, or police). We rely entirely on distant regional services. The combination of the cited extreme weather and the lack of local capacity creates a critical safety gap; if a transport accident or site emergency occurs during a blizzard, response times from Dryden or Ignace could be fatal. The Proponent must demonstrate self-sufficiency or 100% emergency capacity, as reliance on distant hubs during the weather conditions they have identified creates an unacceptable risk to our community.	14. Biophysical Environment
Environment	VCs	High	Request a detailed validation of the 'quantitative understanding' of the site's geology, specifically challenging the assertion that remaining uncertainties do not affect 'fundamental suitability.'	The text asserts that current uncertainties are merely quantitative and do not impact the site's 'fundamental suitability' to contain nuclear waste. This is a premature conclusion that precedes the completion of the Impact Statement. For the residents of Melgund, whose groundwater and land integrity are at stake, 'suitability' must be proven, not assumed. Challenging this assertion ensures that the Proponent does not gloss over potential geological flaws (fractures, hydraulic conductivity) under the guise of 'minor uncertainties.' This rigorous approach protects the community from long-term environmental liability.	14. Biophysical Environment
Human Environment (People)	Baseline	Medium	Challenge the Proponent's exclusion of Melgund Township from the 'collaborative design' of baseline programs and demand the immediate inclusion of the Local Services Board in all future study designs.	The Proponent states that baseline programs were designed collaboratively with 'Anishinaabe peoples of WLON, residents of Ignace and other local community groups,' yet fails to explicitly name Melgund Township (Dyment/Borups Corners), the immediate host/neighbor. This exclusion suggests a gap in social license and overlooks the specific local knowledge held by our residents. Rectifying this by formally including the LSB in study design is an opportunity to improve the relevance of the data collected and ensures that the unique socio-economic concerns of the unorganized territory are not subsumed by the interests of the larger, incorporated Township of Ignace.	14. Biophysical Environment
Environment	Baseline	High	Reject the Proponent's reliance on meteorological data from the Dryden station (55 km away) and mandate the immediate installation of on-site meteorological monitoring stations to capture local micro-climate data.	The Proponent's submission relies on data from Dryden, located 55 km northwest, to model critical factors like wind speed, precipitation, and temperature. For Melgund Township (Dyment/ Borups Corners), which is significantly closer to the site than Dryden, this distance introduces unacceptable margins of error for modeling air quality, noise propagation, and potential radiological dispersion. Establishing on-site monitoring is an opportunity to ensure that the specific atmospheric conditions affecting our residents are accurately captured, rather than approximated from a distant municipality. This will result in a scientifically defensible baseline that respects the distinct local geography of the unorganized territory.	14. Biophysical Environment
Environment	Baseline	High	Request a corrective action plan for the admitted underestimation of winter precipitation (snow water equivalent) and a retrospective correction of the 2022-2023 water balance data.	The Proponent's submission explicitly states that winter precipitation is underestimated, citing an instance where zero precipitation was recorded despite 67 cm of snow accumulation. For Melgund Township, accurate hydrological data is critical for understanding runoff, drainage, and potential containment risks. If the baseline water budget is artificially low due to faulty sensors, the design of stormwater management and containment ponds may be undersized, posing a risk to local water bodies. Correcting this now ensures the Environmental Impact Statement is based on reality, not flawed sensor data, and provides an opportunity to implement more robust monitoring technology.	14. Biophysical Environment
Environment	Baseline	Medium	Challenge the reliance on Dryden Regional station data to fill on-site gaps, specifically citing the significant discrepancy in July 2022 rainfall (215.3 mm at Dryden vs 79.6 mm on-site).	The Proponent claims regional data is 'representative' to justify filling data gaps caused by power failures, yet the submission reveals a ~170% difference in rainfall during a single month. Relying on Dryden data to patch on-site gaps introduces significant uncertainty regarding the site's specific microclimate. Melgund needs assurance that local weather patterns are accurately modeled, as localized storms (or lack thereof) directly impact the modeling of contaminant transport and surface water flow. This is an opportunity to demand robust, redundant on-site power systems to prevent future data loss and ensure site-specific accuracy.	14. Biophysical Environment
Environment	Baseline	Low	Request a detailed integration plan of the short-term microseismic data (collected since 2021) with long-term paleoseismological evidence to validate the claim of stability.	The Proponent relies on a very short window of microseismic monitoring (since 2021) to characterize a site intended for geological isolation over millions of years. While the Canadian Shield is generally stable, the baseline data must be robust enough to rule out active local faults that short-term monitoring might miss. Ensuring this data is rigorously cross-referenced with geological history is vital for the long-term safety confidence of the community and ensures that the 'million-year' safety case is built on more than just a few years of sensor data.	14. Biophysical Environment
Environment	Baseline	High	Request immediate validation and direct mapping of the 'larger-scale structures presently inferred to be fracture zones (FZs)' referenced in the Deep Geology section, moving beyond 'inference' to physical characterization.	The Proponent's submission states that the repository will be positioned 'between' these inferred fracture zones. For Melgund Township, the integrity of the bedrock is the primary barrier preventing radionuclide migration into the local water table. Relying on 'inference' for such critical structural features is insufficient for a safety case. The Proponent must demonstrate through direct measurement (e.g., hydraulic testing) that these zones are not hydraulically connected to the surface. This is a critical opportunity to transition from theoretical modeling to verified safety, ensuring the long-term protection of the local aquifer.	14. SURFACE BEDROCK GEOLOGY
Environment	VCs	High	Challenge the statistical sufficiency of using only six deep boreholes to characterize the entire 40km x 15km Revell batholith as 'homogeneous' and request a justification for this sampling density.	The claim of 'homogeneity' is central to the Proponent's safety case and the selection of the site. However, extrapolating data from only six points across such a vast area introduces significant uncertainty regarding localized geological anomalies. The Environment Working Group must demand a more robust data set to verify that the rock quality at the specific repository site matches the general regional model. This will provide the community with greater confidence that the site selection is based on comprehensive evidence rather than broad generalizations.	14. SURFACE BEDROCK GEOLOGY
Environment	Baseline	Medium	Require site-specific geotechnical drilling and sampling in the 'valleys and wetland areas' where overburden is currently only 'inferred to be several metres thick' to establish precise depth and composition data.	The Initial Project Description admits that while most overburden is thin, wetland areas differ significantly. Without specific depth data for these areas, the impact of construction on local wetlands cannot be accurately assessed. Melgund values its surface water bodies; the Proponent must prove that construction activities over these thicker overburden areas will not disrupt natural drainage or lead to groundwater contamination. Establishing this baseline now prevents unforeseen environmental damage during the construction phase.	14. SURFACE BEDROCK GEOLOGY
Human Environment (People)	Effects Assessment	High	Require the Proponent to provide a detailed evidence-based justification for the claim that there is 'no potential link' between the Project and tick distribution/abundance, specifically analyzing the impact of creating edge habitats on deer (host) density and human interaction.	The Proponent acknowledges community concerns regarding wood ticks and human health but dismisses them by stating no effect pathway exists. However, large-scale infrastructure projects often create 'edge habitats' that increase populations of white-tailed deer, the primary host for ticks. Given that Melgund Township is an unorganized territory with zero local medical services (no doctors, no hospitals), any increase in vector-borne diseases like Lyme disease places a disproportionate burden on residents who must travel to distant hubs (Dryden/Ignace) for treatment. The Working Group must demand a technical defense of the 'no link' assertion rather than accepting a summary dismissal.	14.10 Terrestrial Wildlife and Wildlife Habitat

Environment	Baseline	Medium	Reject the use of 1980s desktop data (GBIF) for terrestrial invertebrates and the 'unoptimized' eDNA results for reptiles; mandate a new, comprehensive field program to establish a valid modern baseline for these groups.	The Proponent's submission relies on terrestrial invertebrate data from the 1980s and admits that 2021 eDNA analyses for reptiles 'may not have been fully optimized,' resulting in zero detections despite high potential for species like snapping turtles. In an unorganized territory like Melgund, the natural environment is the primary asset. Relying on 40-year-old data or failed experimental methodologies creates a significant data gap. The Working Group must require robust, current field data to ensure that 'Species at Risk' and 'Significant Wildlife Habitats' are accurately identified and protected prior to any site disturbance.	14.10 Terrestrial Wildlife and Wildlife Habitat
Environment	Baseline	High	Challenge the sufficiency of the Proponent's moose population baseline, specifically the 'low calf:cow ratio' where the cause is currently undetermined, and require a specific investigation into whether current predation or habitat factors are driving this decline before Project stressors are added.	The Proponent's submission identifies a 'low calf:cow ratio' in the local moose population but admits the cause 'cannot be determined from current evidence.' Despite this, the Proponent asserts that studies are sufficient for a risk-informed assessment. For the Melgund area, where moose are a critical subsistence and cultural resource, proceeding without understanding why the population is already struggling presents an unacceptable risk. If the herd is already at a tipping point due to predation or disease, the additional stress of Project construction (noise, traffic, habitat fragmentation) could lead to local extirpation. The Working Group must demand a causal analysis of this demographic decline to ensure mitigation measures are actually effective.	14.10 Terrestrial Wildlife and Wildlife Habitat
Environment	VCs	Medium	Contest the exclusion of Woodland Caribou and Wolverine from the environmental baseline studies based solely on static distance buffers (61 km and 80 km, respectively) and request a connectivity/ corridor analysis.	The Proponent excludes these wide-ranging species because the project site is currently outside specific regulatory lines. However, residents of Melgund know that wildlife boundaries are fluid, particularly given the pressures of climate change and regional industrial activity. Excluding these iconic species ignores the potential for the project site to serve as a future migration corridor or buffer zone. By demanding these species be included as Valued Components (VCs), the community forces the Proponent to acknowledge the broader regional ecological context rather than hiding behind minimum regulatory compliance distances. This ensures the long-term biodiversity of the unorganized territory is respected.	14.11 Species at Risk and their Habitat
Environment	Baseline	High	Request immediate, traditional field verification (netting/electrofishing) for the American Eel, following the positive eDNA metabarcoding detection which the Proponent currently characterizes as 'uncertain' and 'outside the typical range'.	The Proponent's filing admits to detecting American Eel via eDNA but attempts to minimize this finding by citing uncertainty and range maps. As a community reliant on the integrity of local waterways, Melgund cannot accept the dismissal of a Species at Risk detection as a likely error without empirical proof. If American Eel are present, even in low numbers, it fundamentally alters the regulatory requirements for water crossings and discharge. Forcing the Proponent to validate this 'uncertain' result with physical sampling ensures that the Precautionary Principle is applied to our local water bodies, rather than allowing the Proponent to rely on assumptions that favor the project's simplicity.	14.11 Species at Risk and their Habitat
Environment	Effects Assessment	High	Formally object to the Proponent's statement that studies are 'sufficiently advanced to support a risk-informed assessment' while simultaneously admitting that 'further field studies are needed to verify the presence and distribution of SAR'.	There is a logical contradiction in the Proponent's submission: they claim to be ready to assess risk/impacts (Section E) while admitting they have not yet verified which species are actually breeding on the site. For Melgund Township, accepting an Impact Assessment based on unverified predictions is dangerous. We must demand that the 'risk-informed assessment' be paused or flagged as 'preliminary' until the admitted data gaps regarding species distribution are filled. This prevents the Proponent from locking in mitigation strategies based on incomplete data, ensuring that the final management plans are robust and based on reality, not desktop assumptions.	14.11 Species at Risk and their Habitat
Environment	Baseline	High	Challenge the Proponent's methodology regarding the 'opportunistic identification of candidate Significant Wildlife Habitat (SWH)' alongside terrestrial ecosystem mapping, requesting a transition to systematic, dedicated SWH surveys.	The Proponent's submission explicitly states that SWH identification has been 'opportunistic' rather than systematic. For Melgund Township (Dyment/Borups Corners), where the local environment is the primary asset for residents and potential tourism, relying on chance observations during other mapping activities is an unacceptable risk. 'Opportunistic' methods are statistically likely to miss critical hibernation or maternity sites that are not immediately visible from standard transects. By demanding a systematic survey protocol now, the community ensures that the baseline data accurately reflects the ecological value of the land before any construction decisions are finalized. This improves the project's scientific rigour and prevents the destruction of habitat simply because it was not 'stumbled upon' during preliminary mapping.	14.11 Species at Risk and their Habitat
Human Environment (People)	VCs	Medium	Request a clear definition of the 'potential socio-economic consequences' of the tissue sampling program referenced in Section 14.13.2, and demand a mitigation strategy for Stigma.	The Proponent explicitly admits there are 'potential socio-economic consequences' associated with testing traditional foods for radiation but does not define them. For Melgund, this implies a risk of Stigma—where the mere act of testing implies contamination, potentially harming the local hunting, fishing, and tourism economy. The community needs to know exactly what negative economic impacts the Proponent anticipates and how they intend to protect the reputational value of the area's natural resources.	14.12 Climate Change
Environment	Baseline	High	Challenge the sufficiency of the 'temporary weather station' data (limited to 2021-present) and request a comparative analysis against at least 10 years of historical regional data to validate the 'reasonable range' assertion.	The Proponent's submission relies on a single year of on-site data (2021) to establish the climate baseline. For Melgund Township, which lacks municipal drainage infrastructure, accurate precipitation modeling is critical. Relying on such a short timeframe fails to capture the local micro-climatic extremes necessary to predict flood risks to the unorganized territory's water table and surface water bodies. A robust baseline is required to ensure future water management plans are designed for actual local conditions, not just regional averages.	14.12 Climate Change
Human Environment (People)	Effects Assessment	High	Require a specific vulnerability assessment detailing how projected increases in 'winter and spring precipitation' and 'ice dynamics' will impact emergency response travel times from Ignace and Dryden.	The IPD projects significant increases in winter precipitation and changes to ice dynamics. Melgund Township has zero local emergency services and relies entirely on response from distant hubs (Ignace/Dryden) via Highway 17. Any climate-induced degradation of road conditions (ice/flooding) directly increases response times, creating an unacceptable safety risk for residents. The Proponent must demonstrate how they will maintain 100% emergency access reliability despite these projected climate impacts, rather than relying on standard provincial road maintenance.	14.12 Climate Change
Environment	Effects Assessment	High	Demand a management plan for Naturally Occurring Radioactive Materials (NORM) in excavated bedrock, specifically addressing leaching risks into the local unorganized territory's groundwater.	Section 14.13.2 mentions ongoing geochemical analysis of bedrock that will be 'excavated and exposed.' Since Melgund residents rely on private wells drawing from local groundwater, the surface storage of millions of tonnes of excavated rock containing NORM presents a contamination risk. The Proponent must demonstrate how runoff from this exposed rock will be contained to prevent radionuclide migration into the local aquifer.	14.12 Climate Change
Environment	Baseline	Medium	Request the raw data and specific concentration levels for the Plutonium-238, Plutonium-239, and Strontium-90 detected in soil samples, rather than accepting the qualitative attribution to 'historical global nuclear weapons' fallout.	The text identifies the presence of Plutonium and Strontium in local soil but dismisses it as historical fallout without providing quantitative evidence. To establish a defensible baseline, the Environment Working Group must verify that these 'trace' levels are indeed consistent with background fallout and not indicative of any other anomaly. Establishing precise pre-project levels is essential to ensure the Proponent cannot attribute future site-generated contamination to pre-existing conditions.	14.12 Climate Change

Human Environment (People)	Baseline	High	Request that the 'Infrastructure and services' baseline explicitly quantifies the 'zero-service' reality of Melgund (no fire, police, or ambulance) rather than aggregating service levels with regional hubs like Dryden or Ignace.	The Proponent's submission lists 'infrastructure and services' as a baseline component. As Melgund has no local emergency services, relying on regional data masks the community's extreme vulnerability. The baseline must clearly establish that Melgund is 100% reliant on distant external response. This distinction is critical to justify future demands that the Proponent demonstrate complete self-sufficiency in emergency response, rather than downloading risk onto non-existent local resources.	15. Health, Social & Economic Context
Human Environment (People)	Baseline	High	Challenge the Proponent's admission that the social baseline 'focuses primarily on the municipal context' and request a dedicated socio-economic profile for the unorganized LSB of Melgund that explicitly documents the lack of municipal services and governance.	The Proponent's submission admits the baseline focuses on a 'municipal context.' Melgund is an unorganized territory with no municipal structure, bylaws, or tax base. Applying municipal frameworks to an LSB risks overlooking critical gaps in local capacity and governance. A dedicated profile is necessary to accurately assess how a major industrial project will impact a community with no administrative apparatus to manage it, ensuring the unique vulnerabilities of the LSB are not lost in regional municipal data.	15. Health, Social & Economic Context
Human Environment (People)	Baseline	High	Reject the use of 'approximate community centroids' for Dyment and Borups Corners and require a detailed map of all permanent and seasonal residences to determine actual proximity to the Project site.	The Proponent's submission states distances were calculated using centroids because the communities 'lacked spatial boundaries.' In a scattered rural settlement like Melgund, a centroid is an arbitrary point that may underestimate the proximity of specific homes to the nuclear site. Accurate measurement from the nearest receptor is required to properly assess noise, air quality, and safety risks, rather than an average distance which dilutes the impact on the closest residents.	15. Health, Social & Economic Context
Human Environment (People)	Baseline	Medium	Request verification of the '20 seasonal residents' figure and the specific inclusion of Long Lake cabin owners in the 'Community and Culture' baseline assessment.	The Proponent's submission estimates 20 seasonal residents based on interviews. Underestimating this population minimizes the assessment of impacts on tourism, property values, and seasonal enjoyment of the land. Accurate counts are essential to understand the full scope of the 'human environment' that will be affected by project traffic, noise, and stigma, ensuring that seasonal stakeholders are recognized as valid receptors in the impact assessment.	15. Health, Social & Economic Context
Human Environment (People)	Effects Assessment	Medium	Require a mitigation plan for Mental Health and Addiction services that addresses the Proponent's finding that 'existing supports and services are insufficient to address the need'.	The filing explicitly states that mental health and addiction services in the region are 'insufficient' and that demand is growing. Since Melgund residents rely entirely on these same regional supports, any increase in demand from the project workforce could collapse the existing system. The Proponent must explain how they will augment these services rather than simply drawing from a depleted regional capacity.	15.1 Currently Available Baseline Data for Health Conditions
Human Environment (People)	Baseline	High	Challenge the Proponent's conclusion that 'No further work planned for health outcomes baseline conditions characterization' is acceptable, specifically citing the alarming statistic that the average age of death in Ignace is 63.6 years.	The Proponent's submission identifies that the average age of death for Ignace residents is only 63.6 years, significantly lower than provincial standards. Accepting this as a static 'baseline' without investigating the root causes (whether environmental, industrial, or social) presents a high risk to Melgund. If the community is already experiencing reduced life expectancy, the Local Services Board must understand why before allowing a major industrial project to potentially add cumulative stressors. We must demand a deeper investigation into these mortality rates to ensure the project does not exacerbate an already critical health situation.	15.1 Currently Available Baseline Data for Health Conditions
Human Environment (People)	Baseline	High	Demand the immediate collection of baseline data on gender-based violence, rejecting the Proponent's statement that this data is 'currently not available' and can be deferred.	The Proponent's submission admits that data on gender-based violence is unavailable but claims the baseline is 'sufficiently advanced.' For a remote community like Melgund, the introduction of a large, transient workforce presents specific social safety risks. Establishing a baseline for community safety and violence *before* the project begins is non-negotiable. This data is required now to accurately measure any negative social impacts during the construction phase.	15.1 Currently Available Baseline Data for Health Conditions
Human Environment (People)	Baseline	Medium	Request disaggregated housing data for unorganized territories to contextualize the finding that 13.0% of dwellings in the Kenora CD need 'major repairs'.	The Proponent's submission highlights that housing quality in the region is disproportionately poor compared to the province. Melgund residents, often living in older rural stock, are vulnerable to this 'major repair' deficit. If the project absorbs local tradespeople or increases the cost of construction materials, residents may be unable to maintain their homes. A specific baseline for Melgund is needed to monitor cost-of-living impacts on housing maintenance.	15.1 Currently Available Baseline Data for Health Conditions
Human Environment (People)	Baseline	High	Request a specific assessment of emergency response capacity for 'external causes (injury)', given the Proponent's admission that injury is a leading cause of Potential Years of Life Lost (PYLL) and that existing services are already 'strained'.	The Initial Project Description notes that 'external causes (injury)' are the leading cause of PYLL in Ignace and that demand for services 'further strains other services such as emergency medical services.' Melgund Township is an unorganized territory with zero local emergency services (no fire, ambulance, or police). Reliance on already strained regional hubs in Ignace or Dryden creates an unacceptable safety risk. The Proponent must demonstrate 100% self-sufficiency for project-related injuries and accidents, as the local community has no capacity to absorb additional demand.	15.1 Currently Available Baseline Data for Health Conditions
Human Environment (People)	Baseline	Medium	Contest the assertion in Section 15.3.2 that the non-Indigenous health baseline is 'sufficiently advanced' given the identified gaps in mental health, addiction treatment, and senior services.	The Proponent's submission lists significant service gaps (e.g., lack of residential addiction treatment, crisis response) but does not quantify the current wait times or service ratios. For Melgund, where social support infrastructure is non-existent, accurate quantitative baseline metrics are required to measure future project impacts. The community cannot assess the 'significance' of future effects without a rigorous quantitative baseline of these existing deficits to prove that the project will not worsen the 'disparity in access' mentioned in the text.	15.3 Access to Community Health Care
Human Environment (People)	Baseline	High	Challenge the adequacy of the Ambulance Services baseline (Section 15.3.1) which identifies only two ambulances in Ignace and four in Dryden, failing to analyze response times to unorganized territories.	Melgund Township is an unorganized territory with zero local emergency services; the community relies entirely on the distant hubs of Ignace and Dryden for pre-hospital care. The Proponent's submission highlights that these regional resources are already finite (only 6 units total between two major hubs). Any reliance by the DGR project on these municipal assets creates an unacceptable risk of delayed response for Melgund residents during a concurrent event. The Proponent must demonstrate 100% emergency self-sufficiency to ensure community safety coverage is not degraded.	15.3 Access to Community Health Care
Human Environment (People)	Effects Assessment	High	Request a specific mitigation strategy regarding the Mary Berglund Community Health Centre Hub (MBCHCH), citing the text's admission that the facility is 'operating near capacity and does not have space to dedicate to additional service provision.'	Melgund residents depend on regional centers for primary healthcare. The Initial Project Description explicitly states the Ignace hub cannot handle more volume. Without a binding plan to provide on-site worker healthcare (independent of the public system), the influx of project personnel will displace local residents and exacerbate existing service gaps. This is an opportunity for the Proponent to commit to independent health infrastructure to avoid burdening the public system and ensure Melgund residents retain access to care.	15.3 Access to Community Health Care
Environment	Baseline	Medium	Require the Proponent to update the 'Traditional Foods' baseline data with contemporary field studies (2024-2025) rather than relying on literature from 2014 and 2016.	The Initial Project Description relies heavily on the 'First Nations Food, Nutrition and Environment Study' (2014) and the 'Nokiiwin Tribal Council Country Foods Study' (2016). These datasets are nearly a decade old. Environmental conditions, particularly regarding wildlife populations (moose, grouse) and vegetation patterns (berries, wild rice), change over time due to climate and other factors. To accurately assess the Project's impact on the availability of these resources for Melgund residents, the baseline must reflect current realities, not historical data.	15.4 Traditional Foods and Medicines

Human Environment (People)	VCs	Medium	Formalize the proposed 'participatory tissue sampling program' into a scientifically rigorous, statistically valid monitoring campaign that does not rely solely on voluntary submissions.	The Proponent proposes a 'participatory tissue sampling program' to collect data on fish, game, and plants. While community engagement is positive, relying on voluntary submissions creates data gaps and selection bias. For Melgund residents who rely on these foods for subsistence and health, the assessment requires a defensible scientific methodology (systematic sampling) to ensure that 'safe consumption' conclusions are based on comprehensive data, not just what was voluntarily provided. This ensures the health risk assessment is robust enough to protect the community.	15.4 Traditional Foods and Medicines
Environment	Effects Assessment	High	Challenge the Proponent's assertion that 'neither mercury nor polychlorinated biphenyls are expected to be released' by requiring a specific assessment of contaminant mobilization via physical sediment disturbance and hydrological changes.	The Proponent's submission acknowledges that mercury and PCBs are present in the existing baseline and subject to current advisories in the Wabigoon and Dinorwic systems. While the facility itself may not introduce new mercury, construction activities, road building, and drainage changes can methylate and mobilize existing legacy mercury in wetlands and sediments. For Melgund Township, which sits within these watersheds, the distinction between 'releasing' new chemicals and 'mobilizing' existing ones is irrelevant if the outcome is increased toxicity in local fish. The Proponent must model the physical mobilization of these specific baseline contaminants rather than dismissing them solely because they are not part of the waste stream.	15.4 Traditional Foods and Medicines
Human Environment (People)	Baseline	High	Request immediate, site-specific baseline testing of private residential wells in Dyment and Borups Corners for Uranium and heavy metals, independent of regional averages.	The Proponent's submission notes that 'Residential sources of drinking water are understood to be predominantly well water' and explicitly states that 'Uranium levels were above guideline values in 22 households' in the Boreal Shield ecozone studies cited. As Melgund is an unorganized territory with zero municipal water infrastructure, residents are 100% reliant on private wells. Relying on regional data from 2014 (Chan et al.) is insufficient for establishing a safety baseline. The Proponent must verify current local water quality to ensure that any future changes in groundwater chemistry can be accurately attributed to the Project rather than existing conditions.	15.4 Traditional Foods and Medicines
Human Environment (People)	Effects Assessment	High	The text notes that the LSB of Wabigoon experiences a '50 to 60 percent' population increase during summer months. Request that the Proponent mandate that all emergency response planning and capacity assessments be based on this 'Peak Seasonal' population figure rather than the Census baseline.	Melgund and the surrounding unorganized areas have no local fire, ambulance, or police services. We rely entirely on distant regional hubs (Ignace/Dryden). If the Proponent calculates risk and service ratios based on the lower winter Census population (approx. 419 for Wabigoon), they will dangerously underestimate the strain on emergency infrastructure during the summer. The Proponent must demonstrate 100% self-sufficiency in emergency response capable of handling the region's maximum seasonal load, as the community has no capacity to absorb overflow.	15.5 Population and Demographics
Human Environment (People)	Baseline	High	The Proponent's submission provides specific demographic data for the 'Local Service Board of Wabigoon' but omits specific baseline data for the Local Services Board of Melgund. Request the immediate inclusion of Melgund's demographic profile, including specific counts for seasonal vs. permanent residents.	The Initial Project Description analyzes neighboring unorganized territories (Wabigoon) but fails to characterize Melgund (Dyment/Borups Corners). As an unorganized territory with zero local services, Melgund requires a distinct baseline to accurately assess risks. Relying on regional proxies or data from Wabigoon is insufficient. Without specific data on Melgund's population, the community cannot validate the Proponent's assumptions regarding service demand or emergency evacuation requirements in our specific jurisdiction.	15.5 Population and Demographics
Human Environment (People)	Effects Assessment	Medium	The filing highlights a significantly aging population in the study area (Ignace median age 53.6; LSB Wabigoon 49.2). Request a specific 'Vulnerable Population' impact assessment focusing on emergency evacuation times and access to chronic healthcare.	The demographic data indicates a population significantly older than the provincial average. Older residents are disproportionately vulnerable to project impacts such as road closures, dust, and noise. More critically, in an unorganized territory with no local medical support, an aging population is at higher risk if project-related traffic delays regional ambulance response times. The Proponent must account for this heightened vulnerability and ensure their activities do not impede the critical lifeline to regional hospitals.	15.5 Population and Demographics
Human Environment (People)	VCs	Medium	The Proponent utilizes an 'optimistic growth scenario' based on the Ontario historical average (1.16%) for Ignace and Kenora CD, despite the text acknowledging a historical annual decline of -1.56% and a 53% drop in youth population in Ignace. Challenge this methodology and request a socio-economic impact assessment based on a 'Labour Shortage' scenario.	Using a provincial growth average for a remote region with a shrinking, aging population creates a false premise of local workforce availability. This over-optimism risks masking the reality that the project will likely require a massive influx of transient/temporary workers to fill jobs. A transient workforce presents different social risks (housing pressure, safety) than a resident workforce. Melgund needs a realistic assessment of how a 'shadow population' of non-resident workers will impact the safety and well-being of the unorganized territories.	15.5 Population and Demographics
Human Environment (People)	Baseline	High	The Proponent's submission characterizes the Local Services Board of Melgund as having 'limited resources/services' and relying on volunteers. The Working Group requires the Proponent to explicitly define this baseline to reflect the absolute absence of professional emergency services (Fire, Ambulance, Police) in Dyment and Borups Corners.	The current description of 'limited' resources understates the critical reality that Melgund is an unorganized territory with zero local emergency capacity. Reliance on distant regional services (Ignace/Dryden) creates unacceptable risk for a nuclear host community. Establishing this accurate baseline is essential to demand the Proponent demonstrate self-sufficiency or provide 100% of emergency capacity, ensuring the project does not increase response times or risk for existing residents who currently have no coverage.	15.6 Community and Culture
Human Environment (People)	Effects Assessment	High	The Proponent's submission identifies high food costs and growing food insecurity as a baseline condition in Ignace and Dryden. The Working Group requests a specific assessment of 'Project-Induced Inflation' on the cost of the food basket during the construction phase.	The text confirms that vulnerable populations, including seniors and Indigenous residents, already face financial barriers to accessing food. The introduction of a high-wage project workforce risks exacerbating local inflation, making basic necessities unaffordable. This assessment is critical to Melgund and the region to ensure mitigation measures are developed to protect community well-being and prevent the project from deepening the existing food security crisis identified in the filing.	15.6 Community and Culture
Human Environment (People)	Baseline	Medium	The Proponent's submission acknowledges that the Community Well-Being Index is based on unverified census data that may not reflect community values. The Working Group requests a 'Ground-Truthing' protocol to validate this data with local qualitative input from Melgund and Indigenous neighbours.	Relying on unverified census data risks misrepresenting the actual quality of life and values of the residents. For Melgund, a small unorganized territory, census data often aggregates or misses local nuances. Verifying this data ensures the baseline accurately reflects the 'quiet community' and 'outdoor lifestyle' values mentioned in the filing, preventing a disconnect between the assessment and the lived reality of the stakeholders.	15.6 Community and Culture
Human Environment (People)	VCs	Medium	The Proponent's submission notes a 'lack of community gathering spaces' and funding for development in Melgund. The Working Group mandates the inclusion of 'Community Infrastructure Capacity' as a specific Valued Component (VC) for Melgund.	The text explicitly states that social cohesion in Melgund relies on gathering at the local hall, yet notes a lack of space. As the project brings potential population influx or transient workers, the pressure on these limited volunteer-run facilities will increase. Identifying this as a VC ensures that the Impact Statement evaluates the need for investment in local infrastructure to maintain the 'small-town feel' and social support networks identified as key values in the Proponent's submission.	15.6 Community and Culture
Human Environment (People)	Effects Assessment	Medium	Require the Proponent to demonstrate how Project-generated waste will not displace Melgund residents' access to the Dryden and Ignace landfills.	The filing notes that Melgund residents rely on the Dryden landfill and that the Ignace landfill serves 'adjacent unorganized townships' (approx. 5,000 users). With regional landfills having finite lifespans (e.g., Ignace to 2056, Sioux Lookout 10-40 years) and the Project likely generating significant industrial and domestic waste, there is a strategic risk of reduced capacity or increased tipping fees for unorganized residents. The Proponent must guarantee that Project usage does not compromise the essential waste disposal services currently relied upon by the community, potentially by funding capacity expansions.	15.7 Infrastructure and Services

Human Environment (People)	Effects Assessment	Medium	Assess the potential for 'spillover' housing impacts on Melgund due to capacity saturation in Ignace and Dryden.	The submission highlights that housing in the region is 'at or near capacity' and that Melgund has only 'approximately 25 full-time homes.' An influx of workers unable to find accommodation in municipal centers (where apartments are scarce and waitlists exist) may target unorganized territories for temporary housing or RV parking. This assessment is vital to predict socio-economic shifts, potential inflation of property values, and changes to the rural character of Melgund, ensuring the community is not overrun by overflow demand.	15.7 Infrastructure and Services
Human Environment (People)	Baseline	High	Challenge the Proponent's assertion that the infrastructure baseline is 'sufficiently complete' by demanding a specific 'Emergency Response Gap Analysis' for Melgund.	The Proponent's submission explicitly notes that Ignace EMS staff suffer from 'burnout' and that Dryden call volumes are 'increasing' due to mental health and substance use issues. Melgund is an unorganized territory with zero local emergency services (no fire, ambulance, or police). Community has no local capacity; reliance on distant regional services creates unacceptable risk. The baseline must quantify current response times to Melgund to determine if the Project's added traffic and population will cause critical failures in life-safety coverage for local residents. This analysis is necessary to force the Proponent to demonstrate self-sufficiency rather than further burdening the collapsing regional system.	15.7 Infrastructure and Services
Environment	Baseline	High	Request a comprehensive hydrogeological baseline study specifically for private wells in Melgund, distinct from the municipal systems described for Ignace and Dryden.	The Initial Project Description states that water service in Melgund is the 'responsibility of the homeowner' via cisterns and wells, and that residents manage water on their own properties. Unlike the municipalities of Ignace or Dryden, Melgund has no municipal treatment plant or distribution backup. Establishing a robust, independent pre-project baseline for private well water quality and quantity is critical. This ensures that if Project construction or subsurface activities impact the water table, there is irrefutable evidence to protect residents who rely on these sole sources for survival.	15.7 Infrastructure and Services
Human Environment (People)	Alternatives	Medium	Require a capacity assessment of the 'MNR operates landfill sites' and 'Dryden landfill' referenced in the submission to determine if project waste will displace residential access.	The text indicates that Melgund residents have 'no curbside garbage' service and must transport waste to specific regional landfills. If the project utilizes these same shared facilities, it risks shortening their lifespan, increasing tipping fees, or displacing local residents. The Proponent must evaluate alternative waste disposal methods to ensure that the project does not degrade the existing, limited infrastructure that the community relies upon.	15.7 Infrastructure and Services: Unincorporated Communities (Wabigoon, Melgund, Dinorwic)
Environment	Baseline	High	Establish a comprehensive hydrogeological baseline for private wells and septic efficacy in Melgund, citing the Proponent's submission that water services are the 'responsibility of the homeowner' and rely on 'cisterns and water wells'.	The Initial Project Description confirms that Melgund residents rely entirely on private wells and septic systems for survival. Because the text places the burden of maintenance on the homeowner, the community is highly vulnerable to project-induced changes in the water table or groundwater quality. A rigorous, independent baseline is required to protect residents from potential contamination and to ensure that any future degradation can be accurately attributed to the project rather than pre-existing conditions. This protects the community's primary life-support system.	15.7 Infrastructure and Services: Unincorporated Communities (Wabigoon, Melgund, Dinorwic)
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% emergency response self-sufficiency, noting that the filing identifies only 'volunteer fire departments' in neighboring Oxdrift and Wabigoon, confirming a lack of professional capacity in Melgund.	Melgund Township is an unorganized territory with no local emergency services. The Proponent's reliance on distant, volunteer-run departments in Wabigoon or Oxdrift creates an unacceptable safety risk for a major industrial project. Community has no local capacity; reliance on distant regional services creates unacceptable risk. The Proponent must provide 100% of its own emergency capacity to ensure response times are adequate and to prevent the collapse of the region's fragile volunteer network.	15.7 Infrastructure and Services: Unincorporated Communities (Wabigoon, Melgund, Dinorwic)
Human Environment (People)	Baseline	Medium	Conduct a quantitative noise and vibration baseline study to define the acoustic parameters of the 'quiet community' characterization.	The Proponent describes Melgund as a 'quiet community.' This qualitative description must be translated into quantitative decibel data to enforce compliance during construction and operation. Without a scientific definition of 'quiet,' the community cannot effectively challenge future noise intrusions. This baseline will provide the evidence needed to mandate strict noise mitigation measures that respect the current peaceful nature of the area.	15.6 Community and Culture: Local Services Board of Melgund
Human Environment (People)	Baseline	Medium	Resolve the contradiction regarding social infrastructure by conducting a capacity audit of the 'local hall' versus the reported 'lack of community gathering spaces.'	The Proponent's submission presents conflicting information, stating residents gather at a 'local hall' while simultaneously listing a 'lack of community gathering spaces' as a challenge. This ambiguity prevents an accurate assessment of social infrastructure needs. Clarifying this gap is vital to determine if the Proponent must invest in new facilities to accommodate any project-induced population influx, ensuring that existing community cohesion is not disrupted by overcrowding.	15.6 Community and Culture: Local Services Board of Melgund
Human Environment (People)	Effects Assessment	High	Evaluate the impact of the project on the 'limited resources/services' identified in the submission, specifically regarding safety and emergency response capacity.	The Proponent cites 'limited resources/services' as a key challenge for Melgund. In the context of an unorganized territory with no local fire or ambulance services, this admission highlights a critical vulnerability. The rationale for this task is to force the Proponent to acknowledge that the community has no capacity to absorb additional service demands. The expected solution is for the Proponent to demonstrate self-sufficiency in emergency response, rather than relying on the township's non-existent or limited resources.	15.6 Community and Culture: Local Services Board of Melgund
Environment	Baseline	High	Establish a comprehensive baseline for surface water quality and aquatic health specifically for Melgund Lake.	The Proponent's submission explicitly identifies Dyment as being 'located on Melgund Lake' and notes that residents value 'spending time in nature.' As the project is situated nearby, Melgund Lake represents a critical environmental receptor. Establishing a rigorous pre-project baseline is essential to protect the water body that defines the community's geography and recreational character from potential runoff or contamination. This data will serve as the benchmark for all future monitoring and liability discussions.	15.6 Community and Culture: Local Services Board of Melgund
Human Environment (People)	Effects Assessment	High	Assess the potential administrative and operational burden of the project on the Local Services Board's volunteer-based governance model.	The Proponent acknowledges that the LSB is a 'not-for-profit organization supported by volunteers.' A major industrial project requires significant regulatory engagement, which could easily overwhelm a volunteer-run board. This assessment is critical to determine if the project will exhaust local human resources. The expected result is the identification of a need for Proponent-funded administrative support to ensure the community can effectively engage without burning out its volunteer base.	15.6 Community and Culture: Local Services Board of Melgund
Human Environment (People)	Baseline	High	Challenge the Proponent's statement that 'The NWMO has no planned work to collect additional non-Indigenous land-use baseline data' and request a quantitative usage study of the 'unofficial trail system' and forestry roads identified in the submission.	The Proponent's submission acknowledges that residents utilize the Project site for ATV and snowmobile travel via forestry roads and that tourism/outfitting is critical to the local economy. However, the decision to cease data collection prevents an accurate assessment of how frequently these routes are used. For Melgund Township, where 'sense of place' and outdoor recreation are primary economic drivers, relying on a qualitative description of 'minimal' use is insufficient. This recommendation ensures that the actual volume of recreational traffic is quantified, allowing for an evidence-based assessment of potential economic displacement for local outfitters and residents.	15.8 Non-Indigenous Land and Resource Use

Human Environment (People)	Baseline	Medium	Request a Stage 2 Archaeological Assessment (field survey) for the 342-hectare Project site, rejecting the reliance solely on the 'desktop component of a Stage 1 archaeological assessment'.	The Proponent's submission relies on the Ontario Archaeological Sites Database to conclude there are no known sites. In remote, unorganized territories like Melgund, historical use often goes unrecorded in provincial databases. Relying purely on desktop reviews risks the inadvertent destruction of unmapped cultural heritage. Moving to a field-based assessment is a necessary due diligence step to protect community heritage and ensure the 'social license' for the project is based on verified physical evidence, not just database queries.	15.8 Non-Indigenous Land and Resource Use
Human Environment (People)	Effects Assessment	High	Require the Proponent to conduct a specific Safety Interface Assessment regarding the interaction between Project industrial traffic and the identified 'unofficial' recreational users (ATV/Snowmobile) on forestry roads.	The Proponent identifies that the site is traversed by snowmobile trails (OFSC District 17) and used informally by residents on forestry roads. Melgund Township is an unorganized territory with **ZERO** local emergency services (No Fire, No Ambulance, No Police). Any increase in accidents caused by the mixing of heavy industrial transport and recreational users cannot be managed locally; reliance on distant regional services (Ignace/Dryden) creates an unacceptable risk profile. The Proponent must demonstrate 100% self-sufficiency in managing this safety interface and accident response, rather than downloading risk onto non-existent local capacity.	15.8 Non-Indigenous Land and Resource Use
Environment	Baseline	Medium	Request site-specific baseline abundance data for furbearers and black bears within the specific overlapping management units (Trapline DR024, Bear Management Area IG-09A-040) identified in the submission.	The Proponent characterizes the site as 'disturbed by tree harvesting' with 'minimal important features.' However, the submission also notes overlaps with active commercial Traplines and Bear Management Areas. To verify the claim that the environment is of low value, the Proponent must provide current, site-specific biological data rather than relying on the assumption that past forestry activity negates current habitat value. This ensures that the Environmental Impact Statement is built on actual wildlife presence, protecting the integrity of the local ecosystem.	15.8 Non-Indigenous Land and Resource Use
Human Environment (People)	Effects Assessment	Medium	Request a detailed analysis of potential 'cost of living' increases (Section 15.9.1) specifically for fixed-income seniors in unorganized territories.	The filing identifies that the local population is aging and acknowledges the Project will affect the cost of living. In Melgund, where many residents are seniors on fixed incomes, the introduction of a high-wage nuclear workforce could drive up local costs for services and land. This creates a risk of economic displacement. The Proponent must quantify this risk and propose mitigation strategies to ensure that the economic benefits of the project do not result in the financial exclusion of long-term residents who cannot absorb project-driven inflation.	15.9 Economic Conditions
Human Environment (People)	Baseline	High	Challenge the conclusion in Section 15.9.3 that the economic baseline is 'sufficiently advanced' and request primary data collection for Melgund to replace suppressed Census figures.	The Proponent's submission explicitly notes that for the LSB of Wabigoon, income data is 'suppressed to protect confidentiality' due to small population sizes. As Melgund (Dyment/Borups Corners) is a similarly small unorganized territory, relying solely on Census data results in a statistically invisible baseline. It is critical to reject the reliance on 'random rounding' and suppressed data, as this prevents the community from establishing a defensible starting point to measure future impacts. Primary data collection is required to ensure Melgund is not assessed using generic regional averages that mask local realities.	15.9 Economic Conditions
Human Environment (People)	Effects Assessment	High	Require a specific impact assessment of the predicted 'in-migration' (Section 15.9.1) on the unorganized territory's zero-service capacity.	The Initial Project Description anticipates that meeting labour demand will require in-migration. For Melgund, an unorganized territory with zero local fire, ambulance, or police services, any project-induced population increase creates an immediate safety gap. The Proponent must demonstrate self-sufficiency and explain how they will prevent this demographic shift from overwhelming a community that has no municipal infrastructure to support new residents. Reliance on distant regional hubs for emergency services makes this population growth an unacceptable risk without Proponent-supplied mitigation.	15.9 Economic Conditions
Environment	Alternatives	Medium	Evaluate the environmental trade-offs of the 'Aggregate Permit' for a dedicated quarry/pit (Table 18.3) versus sourcing aggregates off-site.	Table 18.3 indicates the potential for an on-site aggregate quarry or pit. This activity introduces specific environmental stressors including dust, noise, and land disturbance that are distinct from the repository construction. The Environment Working Group should require an analysis of whether opening a new extraction site within the territory is environmentally preferable to transporting materials, ensuring that the option with the least impact on local air quality and land use is selected.	18. Indigenous, Federal and Provincial Environmental Approvals
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate full self-sufficiency regarding the 'National Fire Code of Canada' and 'REGDOC-2.10.1 Nuclear Emergency Preparedness and Response' cited in Section 18.5 and Table 18.1.	The Proponent's submission references compliance with national fire and emergency codes. However, Melgund Township is an unorganized territory with zero local emergency services (no fire department, no ambulance, no police). Reliance on distant regional hubs (Ignace/Dryden) creates unacceptable risk due to response lag times. This gap matters critically to community safety. The Proponent must demonstrate that the project will provide 100% of the required emergency response capacity on-site, rather than assuming reliance on non-existent local municipal infrastructure. This ensures the community is not burdened with risks it cannot manage.	18. Indigenous, Federal and Provincial Environmental Approvals
Environment	VCs	High	Request confirmation that provincial standards for 'Industrial Sewage Works' and 'Water Taking' (Table 18.3) will be adopted as the minimum performance benchmarks, despite the jurisdictional 'uncertainty' noted in Section 18.4.	Section 18.4 suggests that provincial environmental regulations (like ECAs for sewage and water taking >50,000 L/day) may be 'inoperative' if they conflict with federal jurisdiction. This creates a risk that the project might operate under less stringent federal guidelines regarding local water quality. It is vital for the Environment Working Group to secure a commitment that the Proponent will voluntarily adhere to the strict limits of Ontario's Environmental Protection Act and Ontario Water Resources Act to ensure the protection of local surface and groundwater resources.	18. Indigenous, Federal and Provincial Environmental Approvals
Human Environment (People)	Effects Assessment	Medium	Require a detailed safety analysis for the 'Entrance Permit' and 'highway turn off' on Highway 17 mentioned in Section 18.4 and Table 18.3.	The text identifies the need for permits under the Public Transportation and Highway Improvement Act for access to Highway 17. Since Melgund lacks local police services for traffic enforcement, the physical design of this intersection is the primary safety control. The Working Group must ensure the design accounts for heavy industrial loads and high-speed traffic to prevent accidents, particularly given the lack of local emergency medical response. A robust design minimizes the probability of accidents that the community is ill-equipped to handle.	18. Indigenous, Federal and Provincial Environmental Approvals
Human Environment (People)	Triennial Reporting	High	Challenge the Proponent's reliance on the NFWA Section 18(a) 'triennial' reporting cycle for socio-economic effects and request a specific commitment to annual or real-time monitoring for the unorganized territory of Melgund.	The Proponent's submission cites the Nuclear Fuel Waste Act's requirement for triennial reporting as the primary mechanism for monitoring socio-economic effects. For Melgund Township, an unorganized territory with no municipal staff to manage emerging crises, a three-year lag in data reporting is unacceptable. Rapid changes in housing availability, road safety, or social cohesion could destabilize the community long before a triennial report is filed. Establishing a more responsive, continuous monitoring framework will allow for immediate mitigation of adverse effects, ensuring the community is not left vulnerable to rapid socio-economic shifts.	E. POTENTIAL EFFECTS OF THE PROJECT

Human Environment (People)	Effects Assessment	High	Request specific details on how the 'safety case' and 'security' provisions cited in the CNSC licensing section will address the complete absence of local emergency services (fire, ambulance, police) in Melgund.	The text states that the CNSC licensing basis requires the Proponent to demonstrate that 'health, safety, security... are maintained.' However, Melgund Township currently possesses zero local emergency capacity; there is no existing service to 'maintain,' only a critical gap. Reliance on distant regional hubs like Ignace or Dryden creates unacceptable response times for a major industrial project. The Proponent must demonstrate total self-sufficiency in emergency response or fund dedicated local capacity to ensure the safety of residents and the project workforce, turning a potential liability into a safety improvement for the area.	E. POTENTIAL EFFECTS OF THE PROJECT
Environment	Baseline	Medium	Request confirmation that the 'Human Health and Ecological Risk Assessment (HHERA)' updates will explicitly include baseline data from Melgund Township, distinct from the 'Host' communities of Ignace and WLON.	The Proponent's submission emphasizes the 'Host' communities (Ignace/WLON) and general federal jurisdiction. However, the physical environment of Melgund (the unorganized territory surrounding the site and transport routes) contains specific ecological receptors and human health pathways (e.g., private wells, trap lines) that may differ from the 'Host' hubs. To ensure the HHERA is scientifically valid and protective of local residents, the Proponent must segregate and specifically analyze the baseline conditions of the unorganized territory to prevent local impacts from being diluted in regional averages.	E. POTENTIAL EFFECTS OF THE PROJECT
Human Environment (People)	VCs	High	Contest the exclusively positive framing of Assessment Endpoints for Non-Indigenous Economic Conditions, specifically the metrics focused solely on 'Enhancing' participation and revenue.	The Proponent's submission defines economic endpoints strictly through the lens of 'enhancing' opportunities (hiring, business, revenue). This biased framework ignores potential negative economic disruptions critical to Melgund, such as wage inflation, housing shortages, or the drain of labor from existing local businesses and essential volunteer services. As an unorganized territory with limited economic resilience, the LSB requires balanced endpoints that measure 'Economic Strain' and 'Displacement' alongside benefits to ensure the Impact Statement accurately reflects the risks to the local economy.	Table 19.1: Valued Components and Associated Measurement Indicators and Assessment Endpoints
Environment	Effects Assessment	Medium	Challenge the assertion in Footnote (a) that 'changes in climate change indicators due to the Project do not directly affect other VCs'.	The Proponent's submission attempts to isolate Project GHG emissions from broader environmental impacts, stating they do not affect other Valued Components. This simplifies the reality of the region. For Melgund, the interaction between the Project's emissions/activities and a changing climate is critical, particularly regarding hydrology (water levels) and fire risk. The Environment Working Group should request a cumulative effects approach that acknowledges how the Project's climate footprint could exacerbate local environmental sensitivities, rather than dismissing the linkage.	Table 19.1: Valued Components and Associated Measurement Indicators and Assessment Endpoints
Human Environment (People)	Baseline	Medium	Request a specific methodology for baselining the 'current balance and structure of communities' to support the Assessment Endpoint of 'Maintenance of local non-Indigenous social conditions'.	The Proponent's submission acknowledges that the Project can change the 'structure of communities' and 'families'. In Melgund, the social structure is unique to an unorganized territory, relying heavily on informal networks and self-sufficiency rather than municipal institutions. The Working Group must ensure the baseline data collection captures this specific social fabric. Without a granular baseline of how the community currently functions, the Proponent cannot accurately measure whether social conditions are being 'maintained' or eroded by the influx of a large industrial workforce.	Table 19.1: Valued Components and Associated Measurement Indicators and Assessment Endpoints
Environment	VCs	High	Challenge the designation of 'Not applicable' for Assessment Endpoints regarding Air Quality, Noise/Vibration, Hydrogeology, and Surface Water Quality in Table 19.1.	The Proponent's submission categorizes these critical physical factors as 'Intermediate Components' with no independent assessment endpoints, implying they are only relevant if they impact a biological receptor. For Melgund Township, where residents rely directly on groundwater (wells) and surface water, and value the quiet enjoyment of the land, this is unacceptable. The Environment Working Group must demand that specific provincial and federal standards (e.g., PWQO, AAQC) be adopted as binding Assessment Endpoints. This ensures that any degradation of air or water quality is flagged as a significant impact in itself, providing the community with enforceable environmental protection.	Table 19.1: Valued Components and Associated Measurement Indicators and Assessment Endpoints
Environment	Baseline	Medium	Request a specific definition of 'sensitive receptors' for air quality monitoring that explicitly includes individual rural residences and tourist operations in Melgund, rather than limiting the definition to 'hospitals, schools, or community areas' (Section 19.2.2.3).	The text defines high risk based on exceedances at institutional receptors like schools and hospitals. Melgund does not have these facilities; its population is distributed in rural homes and lodges. Using the Proponent's current definition could lead to a 'Low Risk' classification simply because standard urban receptors are absent, ignoring the health impacts on the actual local population. Expanding this definition ensures that baseline data and monitoring reflect the reality of the unorganized territory.	19.2.2 Methods
Human Environment (People)	VCs	High	Request the formal inclusion of the Local Services Board of Melgund in the collaborative process for confirming mitigation measures, which currently only lists 'WLON and the Township of Ignace' (Section 19.2.2.2.2).	The Initial Project Description explicitly identifies the Township of Ignace and WLON as collaborators for confirming mitigation measures but omits Melgund. As the host or immediate neighbor, Melgund's exclusion marginalizes local interests. Formally adding the Local Services Board to this list ensures that mitigation strategies address the specific socio-economic and safety realities of Melgund residents, rather than just those of the regional hub in Ignace. This provides an opportunity to secure binding input on project management.	19.2.2 Methods
Human Environment (People)	Effects Assessment	High	Challenge the Proponent's reliance on standard 'emergency and spill response protocols' (Section 19.2.2.2.2) and demand a demonstration of full project self-sufficiency for fire, spill, and accident response.	The Proponent's submission lists emergency protocols as a standard environmental design feature. However, Melgund Township is an unorganized territory with zero local emergency services (no fire, ambulance, or police). Reliance on distant regional hubs (Ignace or Dryden) creates unacceptable risk due to long response times. The Proponent must provide 100% of the emergency capacity required for the site rather than assuming local municipal support exists. This ensures the safety of the community is not compromised by a gap in service availability.	19.2.2 Methods
Environment	Effects Assessment	Medium	Challenge the validity of using 'conventional mining projects' (Section 19.2.3) as the sole proxy for assessing construction effects and determining mitigation suitability.	The Proponent asserts that DGR construction effects are identical to conventional mining and that mining mitigation is therefore appropriate. However, a DGR requires superior rock mass preservation and hydrogeological isolation compared to a temporary gold mine. Accepting the 'mining proxy' without question risks applying insufficient mitigation standards to critical environmental features like groundwater and deep rock integrity. Melgund must ensure that the environmental standards applied are specific to nuclear waste isolation, not just general resource extraction.	19.2.2 Methods
Human Environment (People)	Effects Assessment	High	Request the explicit inclusion of Melgund (Dyment/Borups Corners) as a named primary stakeholder in the 'transportation plans' communication strategy, rather than grouping it under 'other local communities'.	The Initial Project Description explicitly names the Township of Ignace and WLON for transportation communication but relegates other affected areas to 'other local communities.' Since the project relies on Highway 17 which bisects Melgund, local residents face direct safety risks from increased heavy traffic and wildlife collisions. Explicit recognition ensures Melgund's specific traffic safety concerns are formally addressed rather than overlooked.	Table 19.4: Pathways of Change Screening for Intermediate and Valued ComponentsGeneral
Human Environment (People)	Effects Assessment	Medium	Request a detailed enforcement plan for the prohibition of non-local employees engaging in 'recreational hunting, fishing, or the use of all-terrain vehicles' on surrounding lands.	The text proposes a prohibition on worker recreational land use to mitigate impacts on traditional and local harvesting. However, Melgund lacks a local police force to enforce this. Without a clear, Proponent-funded enforcement mechanism, the influx of workers could lead to resource depletion and conflict with local residents who rely on these resources for subsistence and lifestyle.	Table 19.4: Pathways of Change Screening for Intermediate and Valued ComponentsGeneral

Environment	VCs	Medium	Request that 'Quiet Rural Enjoyment' be assessed as a distinct component of the Noise/Vibration assessment, beyond standard regulatory compliance (NPC-300).	The submission notes that noise and vibration will be 'measurable relative to baseline.' In the pristine, quiet environment of Melgund, noise levels that technically meet industrial regulatory standards may still constitute a significant nuisance and degradation of quality of life. Assessing impacts against a 'rural enjoyment' standard will better protect the community's character.	Table 19.4: Pathways of Change Screening for Intermediate and Valued ComponentsGeneral
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% self-sufficiency in emergency response capacity for 'hazardous and non-hazardous waste management' incidents and 'road wash-outs' identified in the screening table.	The Proponent's submission identifies risks of hazardous waste spills and road infrastructure failure but relies on standard protection programs. Melgund Township is an unorganized territory with zero local emergency services (no fire, ambulance, or police). Reliance on distant regional hubs (Ignace/Dryden) for response to nuclear or industrial accidents creates an unacceptable safety gap. The Proponent must prove they have the on-site capacity to manage these emergencies without burdening non-existent local resources.	Table 19.4: Pathways of Change Screening for Intermediate and Valued ComponentsGeneral
Environment	Baseline	Medium	Require the establishment of specific baseline monitoring stations for surface water and groundwater quality within Melgund Township to validate the claim that changes will be 'measurable' but 'low-degree'.	The Proponent's submission predicts that changes to hydrology and water quality will be 'measurable relative to baseline concentrations.' In an unorganized territory where residents rely exclusively on private wells and local surface water for drinking and household use, any deviation from baseline is significant. Establishing a robust, localized baseline is critical to protecting the community's water security and verifying future impact claims.	Table 19.4: Pathways of Change Screening for Intermediate and Valued ComponentsGeneral
Human Environment (People)	VCs	High	Require the inclusion of Melgund residents and seasonal land users as distinct 'sensitive receptors' in the upcoming Human Health and Ecological Risk Assessment (HHERA), ensuring they are not aggregated with the Township of Ignace.	The Proponent's submission explicitly mentions sharing mitigation and monitoring requirements with 'WLON, the Township of Ignace, and regulatory agencies,' but omits Melgund. As an unorganized territory with residents potentially living closer to the site or access roads than the Ignace town center, Melgund faces unique exposure pathways (e.g., reliance on country foods, proximity to dust sources). If Melgund is not explicitly defined as a receptor in the HHERA, the health risk assessment will fail to capture the specific risks to our community's well-being and safety. This is a critical opportunity to ensure our population is formally recognized in the regulatory framework.	19.2.3.1 AIR QUALITY
Environment	Effects Assessment	Medium	Formally oppose the Proponent's proposal to limit the Impact Assessment Act (IAA) review only to components with 'moderate to extreme risks,' thereby attempting to exclude Air Quality based on a preliminary 'Low Risk' screening.	The Proponent's submission suggests that further assessment under the IAA is expected to be 'only applicable' to areas with moderate to extreme risks. Since they have pre-assigned Air Quality a 'Low Risk' rating without completing the modelling, this appears to be a strategy to avoid rigorous long-term monitoring requirements. For Melgund, even 'low' levels of continuous dust or emissions can degrade the rural quality of life and environment over time. We must ensure Air Quality remains a Valued Component (VC) subject to full assessment to guarantee that enforceable monitoring conditions are placed on the project.	19.2.3.1 AIR QUALITY
Environment	Baseline	High	Challenge the Proponent's reliance on generic industry data (MECP 2017) which assumes emissions settle within 500m to 1km, and demand the immediate completion and peer review of site-specific air quality dispersion modelling.	The Proponent's submission admits that air quality dispersion modelling has not yet been completed, yet assigns a 'Low Risk' rating based on the assumption that dust and emissions will not travel beyond 1km. For Melgund, which is situated in the vicinity of the project and potential transport routes, relying on generic assumptions rather than local meteorological data is unacceptable. We must verify that local wind patterns and topography will not carry Particulate Matter (PM2.5) or heavy metals onto residents' lands or water bodies. Demanding this data now ensures that the 'baseline' is accurate before the Proponent attempts to scope this issue out of the detailed assessment.	19.2.3.1 AIR QUALITY
Human Environment (People)	VCs	High	Challenge the Proponent's definition of 'sensitive receptors' and 'nearest community' to explicitly include residents and seasonal dwellings within the unorganized territory of Melgund (Dyment/Borups Corners).	The Proponent's submission cites the project's location as 'about 10 km from the nearest community' and '12 km from closest WLON resident' as the primary justification for claiming negligible effects. This definition appears to overlook the unorganized territory of Melgund, which may have residents, seasonal camps, or land users closer to the site or along the access routes. By formally requesting the inclusion of Melgund as a distinct receptor group, the Board ensures that the unique socio-economic and health impacts on its residents are not dismissed simply because they fall outside the municipal boundaries of Ignace. This is an opportunity to ensure the Impact Statement reflects the true human geography of the area.	19.2.3.3 NOISE, VIBRATION AND LIGHT
Environment	Baseline	Medium	Request a specific baseline study of 'Dark Sky' quality and ambient soundscapes within the unorganized territory to quantify the current 'remote' conditions.	The text relies on the 'remote location' to mitigate light and noise emissions. However, for Melgund, this 'remoteness' is not just a buffer; it is a critical environmental asset (silence and darkness). Without a quantified baseline of the current dark sky and quiet levels, the Proponent cannot accurately measure the 'degree of adverse effects.' Establishing this baseline is crucial to proving that even 'minimal' industrial light or noise constitutes a significant degradation of the unorganized territory's character.	19.2.3.3 NOISE, VIBRATION AND LIGHT
Human Environment (People)	Effects Assessment	Medium	Assess the specific noise and vibration impacts of the 'rail spur' and 'access road' traffic on the quality of life for residents in Dyment and Borups Corners.	The text identifies 'use of access roads and the rail spur' as sources of noise and vibration. Given that Dyment/Borups Corners are situated along the primary transportation corridor (Hwy 17) likely to connect to these access points, the community will experience these effects disproportionately compared to the 'remote' site itself. The Board must ensure the assessment covers the transportation corridor impacts on local well-being, not just the static site impacts.	19.2.3.3 NOISE, VIBRATION AND LIGHT
Environment	Effects Assessment	High	Reject the 'Negligible Risk' and 'High Confidence' ratings for Noise, Vibration, and Light until the Proponent completes and submits the site-specific modelling admitted to be missing in Section 19.2.3.3.2.	The Initial Project Description admits that 'Noise, vibration, and light modelling have not yet been completed,' yet simultaneously assigns a 'negligible' risk rating with 'high confidence.' For the Melgund community, which relies on the pristine natural environment, accepting a conclusion without supporting data is a strategic risk. The Board must demand that the Proponent demonstrate—through data, not assumptions—that the 'remote location' is sufficient to mitigate impacts. This ensures the regulatory process remains evidence-based and prevents the Proponent from bypassing rigorous assessment of potential nuisances that could degrade the local environment.	19.2.3.3 NOISE, VIBRATION AND LIGHT
Environment	Baseline	High	Request the immediate completion and peer review of the 'Conceptual Groundwater Model' to substantiate the claim that drawdown effects will be limited to 'a few hundred metres'.	The Proponent's submission admits the groundwater model is 'planned but not yet completed' while simultaneously concluding the risk is low. For Melgund Township, where residents likely rely on private wells, speculative assurances are insufficient. The Local Services Board requires evidence-based mapping of the drawdown cone to ensure it does not intersect with or deplete local residential water sources. Completing this model is a critical baseline requirement before accurate impact predictions can be made.	19.2.3.4 HYDROGEOLOGY
Environment	VCs	Medium	Request the specific geochemical sampling density and methodology used to determine that all excavated rock is 'non-acid generating'.	The Proponent's assertion that residual effects on groundwater quality are 'not anticipated' hinges entirely on the claim that the rock is non-acid generating. If this baseline assumption is flawed due to insufficient sampling of geological heterogeneity, the region's groundwater could face long-term degradation. Validating this data is essential to protect the environmental integrity of the local watershed.	19.2.3.4 HYDROGEOLOGY

Human Environment (People)	Effects Assessment	High	Formally challenge the exclusion of the Local Services Board of Melgund from the list of entities receiving site-specific mitigation measures and monitoring requirements.	The Proponent's submission explicitly states that information will be shared with 'WLON, the Township of Ignace, and applicable regulatory agencies,' completely omitting Melgund. As the Local Services Board representing the unorganized territory, this exclusion implies a lack of consideration for the community's safety and right to know. Melgund must be added to this distribution list to ensure the community is informed of potential risks to their water supply and well-being.	19.2.3.4 HYDROGEOLOGY
Human Environment (People)	Effects Assessment	High	Require the Proponent to demonstrate 100% self-sufficient emergency response capacity for failures within the 'integrated water management system' (e.g., pump failure, storage overflow).	The submission relies on 'design and maintenance' to manage runoff and seepage. However, Melgund is an unorganized territory with **zero** local emergency services (no fire, no hazmat). If the water management system fails and causes a spill or uncontained flow, the community has no capacity to respond. Reliance on distant services in Ignace or Dryden creates an unacceptable time lag. The Proponent must prove they have the on-site equipment and personnel to handle containment breaches without external aid.	19.2.3.4 HYDROGEOLOGY
Environment	Effects Assessment	High	Request specific spatial mapping and concentration gradients for the proposed 'regulated mixing zone' where effluent dilution is expected to occur.	The Proponent's submission notes that regulatory guidelines will be met 'within a regulated mixing zone.' This implies that within this specific zone, water quality guidelines may be exceeded. Melgund stakeholders must know the exact location and size of this zone to ensure it does not overlap with critical fish habitats, tourist lodge water intakes, or recreational areas. Clarifying this boundary is an opportunity to protect local assets and ensures that 'dilution' is not used as a substitute for adequate treatment.	19.2.3.5 HYDROLOGY AND SURFACE WATER QUALITY
Environment	Effects Assessment	Medium	Challenge the Proponent to demonstrate the resilience of the 'water management system' and 'storage capacity' against extreme climate events (e.g., 100-year storms, rapid spring freshet) rather than relying on standard 'industry experience.'	The Proponent's submission acknowledges that 'short-term changes may occur due to storm events' that require greater discharge volumes. Given the changing climate in Northwestern Ontario, standard industry designs may be insufficient. If the storage capacity is overwhelmed, untreated runoff could enter the watershed. Ensuring the system is stress-tested against extreme local weather scenarios provides an advantage in preventing environmental accidents that would damage the region's reputation.	19.2.3.5 HYDROLOGY AND SURFACE WATER QUALITY
Environment	Baseline	High	Require the immediate completion and peer review of the 'integrated site-wide water balance and water quality modelling' prior to the acceptance of any risk designations.	The Proponent's submission explicitly states that this critical modelling 'has yet to be completed,' yet simultaneously assigns a 'Low Risk' rating to hydrology and surface water quality. For Melgund Township, where the local economy relies heavily on pristine water bodies for tourism and fishing, accepting a risk rating without the underlying data is unacceptable. This recommendation ensures that the 'Low Risk' designation is proven by site-specific science rather than assumed based on general 'industry experience.' Adopting this recommendation prevents the project from advancing on speculative assertions.	19.2.3.5 HYDROLOGY AND SURFACE WATER QUALITY
Human Environment (People)	Effects Assessment	High	Demand a 'Self-Sufficient Response Plan' for water contamination events, specifically addressing the scenario where storm events reduce 'sediment and erosion control effectiveness.'	The Proponent's submission admits that storm events may temporarily reduce control effectiveness, potentially altering water quality. Melgund Township is an unorganized territory with zero local emergency services or water treatment infrastructure; residents and businesses often rely on private intakes or direct surface water usage. The community cannot rely on distant regional hubs (Ignace/Dryden) to manage a water contamination crisis. The Proponent must demonstrate 100% self-sufficiency in detecting and containing water quality breaches immediately to protect the health of downstream residents.	19.2.3.5 HYDROLOGY AND SURFACE WATER QUALITY
Human Environment (People)	Baseline	Medium	Request a baseline inventory of all downstream surface water users (drinking water, lodges, recreational) in the Melgund area to assess the impact of 'residual adverse effects' on human health.	The Proponent's submission identifies a potential for 'residual adverse effects' on surface water quality and mentions 'non-Indigenous health conditions' as a pathway of change. To accurately assess this risk, the Proponent must identify exactly who is using the water downstream. This is critical for Melgund, as the unorganized territory lacks municipal water systems, making individual users highly vulnerable to even 'low risk' changes in water quality. This data will ensure that monitoring programs are relevant to actual human usage.	19.2.3.5 HYDROLOGY AND SURFACE WATER QUALITY
Environment	Baseline	High	Request the specific quantitative baseline data and statistical definition of 'natural variability' for soil and sediment chemistry in the Melgund area.	The Proponent's submission claims that contaminant concentrations in sediments will remain within 'natural variability' beyond the immediate discharge point. However, without a clearly defined, site-specific baseline for Melgund, this term is subjective and unenforceable. Establishing this baseline now ensures that future monitoring can accurately detect contamination from 'moderate likelihood' events like dust deposition and effluent discharge, protecting local land quality.	19.2.3.6 TOPOGRAPHY, SOILS AND SEDIMENT
Environment	Effects Assessment	High	Require immediate clarification and correction of Table 19.11, which is referenced as the risk screening for 'Topography, Soils and Sediment' but is titled 'Surface Water Quality'.	This significant clerical error raises concerns about the integrity of the risk assessment. The Board must verify whether the 'Low Risk' conclusion presented in the text is based on actual soil and sediment data, or if surface water data was inadvertently substituted. Ensuring the data matches the component is critical for a valid regulatory review.	19.2.3.6 TOPOGRAPHY, SOILS AND SEDIMENT
Environment	Effects Assessment	Medium	Request specific evidence and case studies demonstrating the effectiveness of the proposed 'proven' mitigation measures for preventing soil contamination from fugitive dust and effluent in conditions similar to the Melgund area.	The text admits a 'moderate likelihood' of residual effects on soil and sediment quality from dust and effluent but categorizes the final risk as 'low' based on the assumption that mitigation will be 100% effective. Given Melgund's reliance on the land for hunting and gathering, the Board requires proof that these measures will effectively contain contaminants in this specific environment, rather than relying on general industry assertions.	19.2.3.6 TOPOGRAPHY, SOILS AND SEDIMENT
Environment	Baseline	Medium	Challenge the Proponent's assertion that the Project site contains 'no unique or rare topographical features' and is merely 'typical of the Canadian Shield,' and request a mechanism to incorporate local knowledge into topographical mapping.	The Initial Project Description dismisses the topography as generic. For the residents of Melgund, specific landforms (ridges, drainage basins, outcrops) may hold ecological, recreational, or practical significance that a high-level regional assessment overlooks. Validating this claim ensures that locally valued landscape features are not destroyed under the assumption that they are commonplace.	19.2.3.6 TOPOGRAPHY, SOILS AND SEDIMENT
Human Environment (People)	Baseline	High	Require the inclusion of baseline fish tissue toxicology data (mercury, heavy metals) for species consumed by local residents as part of the 'non-Indigenous health conditions' assessment.	The Proponent's submission explicitly links changes in fish habitat to 'non-Indigenous health conditions.' Since Melgund is a rural community where residents likely utilize local waterbodies for recreational and subsistence fishing, establishing a rigorous pre-project baseline for fish tissue quality is essential. This data will serve as a critical benchmark to protect community health and ensure that any future changes in fish edibility can be accurately monitored and attributed, preventing ambiguity regarding project impacts on local food sources.	19.2.3.7 FISH AND FISH HABITAT
Environment	Baseline	High	Challenge the sufficiency of the 'non-acid generating' rock classification by requesting comprehensive leachate testing for neutral-pH metal leaching and blasting residues (nitrates/ammonia).	The Proponent's submission relies on the finding that excavated rock is 'non-acid generating' to conclude that groundwater seepage poses no risk to fish health. However, for Melgund Township, where residents rely on local aquifers and surface water, this narrow definition is insufficient. Rock that does not generate acid can still leach heavy metals (such as arsenic) or release toxic blasting byproducts into the water table. Expanding the baseline testing requirements ensures that the community is protected against contaminants that standard Acid Rock Drainage (ARD) testing would overlook, providing a higher safety margin for local water quality.	19.2.3.7 FISH AND FISH HABITAT

Environment	Effects Assessment	Medium	Request specific quantitative definitions and thresholds for the terms 'Negligible degree' and 'Moderate likelihood' used in the residual effects risk screening.	The Proponent's submission rates the residual effects on fish habitat as having a 'Moderate likelihood' but a 'Negligible degree,' resulting in a 'Low Risk' classification. Without quantitative metrics (e.g., specific percentages of habitat loss or water quality variance), these subjective terms prevent the Local Services Board from assessing the true scale of impact. Defining these terms is critical to ensure that 'negligible' does not mask cumulative degradation of the local ecosystem over the project's lifespan, allowing for enforceable compliance standards.	19.2.3.7 FISH AND FISH HABITAT
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate full emergency response self-sufficiency for the 'two trucks per day' of radioactive shipments and associated logistics, specifically addressing the lack of local capacity.	The Proponent's submission estimates a steady flow of 'approximately two trucks per day' carrying Used Fuel Transportation Packages (UFTPs). However, Melgund Township is an unorganized territory with zero local emergency services (no fire, police, or ambulance). Reliance on distant regional hubs like Ignace or Dryden for accident response creates unacceptable delays and risk exposure for residents in Dyment and Borups Corners. This gap matters because a transport incident could escalate significantly before external help arrives. The expected solution is for the Proponent to commit to providing 100% of the emergency response capacity required for their logistics. This presents an advantage by ensuring the project does not burden non-existent local infrastructure and guarantees immediate response capabilities for the safety of the community.	10. Estimated Maximum Production Capacity of the Project
Environment	Effects Assessment	Medium	Request a detailed inventory and management plan for secondary waste streams generated by the 'copper application and machining cell' and 'welding' processes described in the UFPP workflow.	The Initial Project Description details the 'copper application' and 'machining smooth' of weld areas but fails to account for the hazardous byproducts generated, such as copper shavings, dust, and industrial cutting fluids. This matters to Melgund because copper is highly toxic to aquatic life, and unmanaged industrial runoff could contaminate local soil and water bodies. The expected solution is a rigorous waste balance sheet that accounts for every kilogram of material machined off the containers. Adopting this recommendation improves the project's environmental integrity by ensuring that the 'packaging' process does not become a source of conventional heavy metal contamination in the local ecosystem.	10. Estimated Maximum Production Capacity of the Project
Human Environment (People)	Alternatives	High	Demand specific maximum capacity limits and time duration caps for the 'temporary dry storage' of used fuel modules at the UFPP surface facility.	The text states that used fuel modules 'may be placed into temporary dry storage as required' but provides no definition of 'temporary' nor a limit on volume. For the community of Melgund, this ambiguity presents a significant safety risk: if the underground emplacement system fails, the surface facility could inadvertently become a long-term storage site. This matters because the safety case for surface storage differs from deep geological isolation. The expected solution is a binding operational limit on surface inventory. This provides the advantage of preventing 'function creep' and assures the community that the site will not evolve into a permanent surface parking lot for nuclear waste.	10. Estimated Maximum Production Capacity of the Project
Environment	Baseline	Medium	Establish baseline air quality monitoring parameters specifically for silica and particulate matter associated with the proposed on-site 'concrete batch plant' and 'sealing material compaction plant'.	The Proponent plans to operate a 'concrete batch plant' and a 'sealing material compaction plant' on-site to manufacture bentonite blocks and construction materials. These industrial activities are known sources of silica dust and particulate matter. This matters to Melgund because the current baseline is a pristine rural environment; the introduction of heavy manufacturing could degrade local air quality. The expected solution is the inclusion of specific industrial dusts in the baseline study. This offers the advantage of establishing a clear 'before' state, allowing for accurate monitoring and enforcement of air quality standards during the 50-year operational phase.	10. Estimated Maximum Production Capacity of the Project
Human Environment (People)	Triennial Reporting	Medium	Require a detailed 'Intergenerational Knowledge Transfer' plan for the 100-year 'Decommissioning and Closure' phase (2093-2192).	The schedule outlines a century-long period of 'Extended Monitoring' and closure. Melgund Township requires assurance that site knowledge, safety protocols, and community engagement funding will not erode over this extended timeframe. Without a binding mechanism to maintain 'social memory' and oversight capacity across multiple generations, the community faces the risk of becoming a passive host to a forgotten hazard. Establishing this framework early ensures that future residents of the unorganized territory retain agency and resources to monitor the site effectively throughout the 22nd century.	11. Anticipated Schedule
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate full emergency response self-sufficiency during the proposed 13-year 'Site Preparation and Construction' phase (2030-2042).	The Proponent's schedule identifies a 13-year period of intensive industrial activity starting in 2030. Melgund Township is an unorganized territory with zero local emergency services (no fire, police, or ambulance). Reliance on distant regional hubs like Ignace or Dryden creates unacceptable response times for potential construction accidents, fires, or spills. The Proponent must provide 100% of emergency capacity on-site to ensure community safety is not compromised by this decade-long industrial phase. This requirement ensures that the project does not burden the nonexistent local infrastructure and guarantees immediate response capabilities for the safety of residents and workers.	11. Anticipated Schedule
Environment	Effects Assessment	High	Request specific technical justification for the 'active measures' cited in the Institutional Control definition, specifically the reference to 'water treatment' post-2193.	The Proponent's submission defines Institutional Control (Year 2193+) as potentially including 'water treatment'. This implies a risk of long-term groundwater or surface water contamination that persists beyond the 160-year project lifecycle. For the local ecosystem in Melgund, which relies on clean water tables, this suggests a permanent environmental burden. The Proponent must clarify if this is a contingency or a predicted necessity based on hydrological modeling. Clarifying this ensures that the community understands the true long-term environmental liabilities and can demand robust preventative engineering to avoid perpetual water treatment.	11. Anticipated Schedule
Environment	Baseline	High	Request site-specific hydrogeological data to validate the claim in Tables 12.1 and 12.4 that the host rock exhibits 'low groundwater flow,' distinguishing local Revell site conditions from general Canadian Shield averages.	The Initial Project Description relies on broad characterizations of the Canadian Shield to justify the safety of the 'Geosphere Barrier,' stating it has 'low groundwater flow.' However, general regional data may not reflect specific fracture zones or aquifers present at the Revell site in Melgund. Establishing a rigorous, site-specific baseline for groundwater movement is critical to verifying that the natural barrier will effectively isolate waste from the local water table and surface water bodies that the community relies on. This validation is an opportunity to confirm the site's actual suitability before proceeding.	12. Alternatives To and Alternative Means
Human Environment (People)	Alternatives	Medium	Require a detailed Research & Development roadmap for the 'retrieval technology' mentioned in Table 12.4, which the text admits 'would need to be further developed and demonstrated.'	The preferred 'Adaptive Phased Management' alternative relies heavily on the concept of retrievability to ensure safety and flexibility for future generations. However, the text explicitly admits that the technology to retrieve containers 'would need to be further developed.' This admission represents a significant technical gap and a potential safety risk for the community if retrieval becomes necessary but technically impossible. Demanding a concrete roadmap for this technology ensures that the 'adaptive' nature of the project is technically feasible and not just a theoretical promise, protecting the long-term interests of Melgund residents.	12. Alternatives To and Alternative Means

Human Environment (People)	Alternatives	High	Challenge the feasibility of the 'emergency response plan' requirement cited in Tables 12.1 (Option 1) and 12.4 (Option 4) regarding transportation, specifically demanding the Proponent demonstrate self-sufficiency.	The Proponent's description of the DGR and APM alternatives explicitly states that transportation 'would require an emergency response plan.' However, Melgund Township is an unorganized territory with zero local emergency services (no fire, ambulance, or police). The text's assumption that a standard plan can be implemented ignores the critical gap in local infrastructure. Reliance on distant regional services from Ignace or Dryden creates unacceptable risks due to extended response times. The Proponent must provide 100% of the emergency capacity required for the project rather than relying on non-existent local resources. Addressing this gap ensures the safety of residents along the transportation corridor.	12. Alternatives To and Alternative Means
Environment	Baseline	Medium	Establish comprehensive baseline monitoring for groundwater, surface water, and air quality that explicitly models the 'significant changes... associated with climate change' referenced in Objective 6.	Objective 6 highlights the need to protect groundwater and air quality while accounting for climate change. Since Melgund residents rely heavily on local groundwater wells, establishing a robust pre-project baseline is critical. This baseline must model how climate change might alter aquifer behavior independent of the project, ensuring that the Proponent's 'Environmental Integrity' objective can be accurately verified against future conditions. This protects the community's water security by distinguishing between climate impacts and project-related contamination.	12.1.2.1 OBJECTIVES CONSIDERED IN COMPARATIVE ANALYSIS
Human Environment (People)	VCs	High	Request the inclusion of 'Community Polarization' and 'Stigma' as formal Valued Components (VCs) with defined measurement indicators, citing their specific mention in Objective 4.	The Initial Project Description explicitly identifies 'community polarization' and 'stigma' as potential impacts on social fabric and culture. For the 'Community Well-Being' objective to be effectively monitored, these qualitative factors must be translated into measurable indicators (e.g., specific social cohesion surveys, property value tracking methodologies) rather than remaining abstract concerns. Formalizing these as VCs ensures the Proponent is accountable for monitoring and mitigating the social fracturing of Dyment and Borups Corners.	12.1.2.1 OBJECTIVES CONSIDERED IN COMPARATIVE ANALYSIS
Human Environment (People)	Effects Assessment	Medium	Require a detailed assessment of how the 'civil disobedience' and 'societal breakdown' scenarios identified in Objective 5 will be managed given the lack of local policing in Melgund.	The Proponent's submission discusses security risks including 'civil disobedience' and 'societal breakdown.' As Melgund has no local police force, the management of these risks implies either a heavy reliance on distant OPP detachments or the introduction of private security forces. The Proponent must clarify how security will be maintained without compromising the safety, freedom of movement, or resources of local residents, ensuring that the 'Security' objective does not result in the militarization of the local community.	12.1.2.1 OBJECTIVES CONSIDERED IN COMPARATIVE ANALYSIS
Human Environment (People)	Effects Assessment	High	Challenge the Proponent's claim of providing 'appropriate contingency action' for transportation accidents and unplanned events (Objective 2) by demanding a demonstration of 100% self-sufficiency in emergency response.	The Proponent's submission states that 'appropriate contingency action' will be provided for accidents and unplanned events. However, Melgund Township is an unorganized territory with zero local emergency services (no fire, ambulance, or police). Relying on response assets from distant hubs like Ignace or Dryden creates unacceptable risks regarding response times and capacity. To ensure the 'Public Health and Safety' objective is met, the Proponent must demonstrate how they will provide full emergency capacity without relying on non-existent local infrastructure. This ensures the community is not left vulnerable during a transportation incident.	12.1.2.1 OBJECTIVES CONSIDERED IN COMPARATIVE ANALYSIS
Environment	Baseline	High	Request the specific baseline metrics and indicators that will be used to define and monitor 'environmental integrity' regarding groundwater and geologic media during the proposed 'extended period' of testing.	The Proponent's submission claims that the design is robust enough to 'protect environmental integrity' and allows for 'active monitoring' to refine designs. However, the text does not define what constitutes 'integrity' for the specific geology and aquifers underlying Melgund. Since residents rely on local wells, it is critical to establish rigorous baseline data for water and soil quality now. This will allow the community to hold the Proponent accountable to their claim that the system can be 'tested and refined' without degrading the local environment.	12.1.2.2 SUMMARY OF FINDINGS AND RECOMMENDED OPTION
Human Environment (People)	Effects Assessment	High	Challenge the Proponent's reference to 'preventive measures to evacuate residents' by demanding a detailed operational plan that demonstrates 100% Proponent self-sufficiency, rather than reliance on municipal support.	The Proponent's submission explicitly cites the potential need to 'evacuate residents and businesses' or take 'mitigation measures' in the event of a nuclear incident. Melgund Township is an unorganized territory with zero local emergency services (no police, fire, or ambulance). Reliance on distant regional hubs (Ignace/Dryden) creates unacceptable response lag times for an evacuation scenario. Therefore, the Proponent must demonstrate they provide 100% of the emergency capacity required to execute these measures, as the community has no local capacity to assist. This ensures that the safety of Dyment and Borups Corners residents is not compromised by a lack of municipal infrastructure.	12.1.2.2 SUMMARY OF FINDINGS AND RECOMMENDED OPTION
Human Environment (People)	VCs	Medium	Require the Proponent to quantify the qualitative claim that radiological and non-radiological exposures are 'estimated to be very small' with specific numerical thresholds and receptor locations relevant to Melgund residents.	The Initial Project Description relies on vague descriptors ('very small') to describe public health risks. For the residents of Melgund, who are the nearest human receptors to the project, subjective terms are insufficient for assessing safety. The Proponent must provide concrete data to demonstrate that these estimates account for the specific proximity and lifestyle (e.g., consumption of local country foods/water) of the local population. This opportunity allows the community to move the discussion from general assurances to verifiable safety limits.	12.1.2.2 SUMMARY OF FINDINGS AND RECOMMENDED OPTION
Human Environment (People)	VCs	High	Challenge the Proponent's assertion that the project will 'safeguard... human health' by requiring a detailed gap analysis of emergency response capabilities within Melgund Township.	The Proponent's submission justifies the project as the 'safest' method to 'safeguard human health.' However, Melgund Township is an unorganized territory with zero local emergency services (no fire, police, or ambulance). Reliance on distant regional hubs (Ignace/Dryden) creates unacceptable response times for an industrial nuclear facility. To validate the claim that health and safety can be safeguarded, the Proponent must demonstrate 100% self-sufficiency in emergency response, rather than relying on non-existent local capacity.	12.1.2.3 FEDERAL DECISION AND SUPPORT
Human Environment (People)	Baseline	High	Request the specific methodology, metrics, and data used to determine the 'willingness' of the unorganized communities of Dyment and Borups Corners, distinct from the Township of Ignace.	The Proponent's submission claims that site selection is 'satisfied' based on the willingness of 'proximate communities.' However, Melgund Township (Dyment/Borups Corners) is a direct neighbor to the Revell site yet lacks a municipal government to formally convey willingness. Relying solely on the Township of Ignace's position effectively disenfranchises Melgund residents. To ensure the 'social acceptability' cited in the filing is genuine, the Board requires evidence of how local unorganized residents were consulted and how their specific input was weighed against regional 'broad agreement.'	12.1.2.3 FEDERAL DECISION AND SUPPORT
Human Environment (People)	Effects Assessment	High	Require a cumulative effects assessment that explicitly models the inclusion of Intermediate-Level Waste (ILW) and non-fuel High-Level Waste, as referenced in the Integrated Strategy section of the filing.	The Proponent's submission acknowledges the Government of Canada's acceptance of a strategy to potentially add ILW and non-fuel HLW to the DGR mandate. Although the filing states this is 'not within the scope of the current IPD,' this reasonably foreseeable expansion fundamentally alters the risk profile, transportation volume, and operational lifespan of the project. Melgund residents cannot evaluate the true 'social acceptability' or long-term safety risks based on a partial project description; the cumulative impact of this expanded waste inventory must be assessed immediately to protect community interests.	12.1.2.3 FEDERAL DECISION AND SUPPORT

Human Environment (People)	Alternatives	High	Challenge the 'illustrative conceptual engineering designs' used during the dialogue process to determine if they explicitly disclosed Melgund's lack of emergency services (fire/ambulance) to participants.	The text states that public dialogue and 'societal direction' were based on 'conceptual designs' provided by specialists. If these designs implied standard municipal infrastructure support (e.g., local fire response to accidents or spills), the resulting public feedback is based on a false premise for the Revell site. Melgund is an unorganized territory with zero local emergency capacity. We must ensure that the 'social and ethical considerations' gathered were informed by the reality of our territory's limitations, rather than a generic assumption of available services. If participants were not informed that the host site lacks police, fire, and ambulance, the 'trustworthiness' of the feedback regarding safety and risk management is compromised.	12.1.3.1 A RESPONSIVE STUDY PROCESS
Human Environment (People)	Baseline	High	Request a disaggregated report of the 'nationwide surveys,' 'focus groups,' and 'discussion sessions' cited in Section 12.1.3.1, specifically isolating data collected from residents of Dyment, Borups Corners, and Melgund Township.	The Proponent's submission relies heavily on 'representative feedback' and 'societal direction' derived from broad national and regional engagement. However, Melgund Township is the specific host community, and its residents face unique existential risks that the general Canadian public does not. Aggregated national data risks diluting distinct local concerns regarding social cohesion, stigma, and safety. To establish an accurate socio-economic baseline, the LSB must verify whether local sentiment was accurately captured and weighted, or if it was statistically overwhelmed by respondents from urban centers who do not bear the direct burden of the project. This ensures the 'diversity of voices' includes the most critical voice: the host community.	12.1.3.1 A RESPONSIVE STUDY PROCESS
Human Environment (People)	VCs	High	Challenge the methodology of the 'Scenarios Exercise' which limited 'detailed scenarios' to only 25 years, and request detailed socio-economic modeling that spans the full operational life of the project.	The Proponent's submission states that detailed scenarios were produced for only 25 years, with longer timeframes relegated to 'less detailed' or 'simple what-ifs.' For a community hosting a project with a multi-generational lifespan, a 25-year detailed outlook is insufficient. Melgund needs to understand how the project will impact community well-being, housing, and social cohesion beyond the initial construction phase. Limiting detailed analysis to 25 years obscures potential long-term risks, such as the 'bust' cycle of the economy or the long-term strain on volunteer-based social supports in the region.	12.1.3.2 PROCESS OF COLLABORATIVE DEVELOPMENT WITH THE CANADIAN PUBLIC AND INDIGENOUS PEOPLES PHASE 1
Human Environment (People)	Baseline	Medium	Require a comparative infrastructure analysis between Melgund Township and the 'communities that currently store used nuclear fuel' cited in the submission.	The Proponent's submission relies on the 'lived experience' of citizens from current storage communities (e.g., Pickering, Bruce) to inform the study. These communities are typically well-resourced municipalities with full-time fire and police departments. Melgund has no such services. Using the comfort level of residents in fully serviced municipalities to predict the social acceptance or safety perception in an unorganized territory is a false equivalence. The Working Group must demand the Proponent demonstrate how this 'experience' is relevant given the critical gap in local protective services.	12.1.3.2 PROCESS OF COLLABORATIVE DEVELOPMENT WITH THE CANADIAN PUBLIC AND INDIGENOUS PEOPLES PHASE 1
Environment	Baseline	Medium	Request the index and content of the 'Science and Environment' papers commissioned in Phase 1 to determine if they utilized local site-specific data or generic geological models.	The Proponent's submission claims to have built an 'information foundation' using approximately 70 specialist papers, including those on 'Science and Environment.' It is critical to determine if these early papers were based on the specific granite and muskeg conditions of the Revell site or if they relied on generic environmental assumptions. If the foundation of the environmental assessment is based on generic models rather than local field data, the subsequent predictions regarding water quality and containment safety may be inaccurate. This review is an opportunity to ensure the baseline data reflects the actual local environment.	12.1.3.2 PROCESS OF COLLABORATIVE DEVELOPMENT WITH THE CANADIAN PUBLIC AND INDIGENOUS PEOPLES PHASE 1
Human Environment (People)	Baseline	High	Request the specific 'Health and Safety' papers commissioned in Phase 1 to audit them for assumptions regarding local emergency response capacity.	The Proponent's submission notes that 'Health and Safety' papers were commissioned to build an information foundation. However, Melgund Township is an unorganized territory with zero local emergency services (no fire, no ambulance, no police). If these foundational papers assume the existence of standard municipal emergency infrastructure, the baseline safety case is fundamentally flawed. The Working Group must verify that the Proponent has not relied on 'generic' safety models that fail to account for the community's total reliance on distant hubs like Ignace or Dryden, which creates unacceptable risk profiles for local residents.	12.1.3.2 PROCESS OF COLLABORATIVE DEVELOPMENT WITH THE CANADIAN PUBLIC AND INDIGENOUS PEOPLES PHASE 1
Human Environment (People)	Alternatives	High	Request the 'preliminary analysis of alternative management approaches' to determine if the 'availability of local emergency response infrastructure' was a weighted criterion in the Assessment Team's review.	The text indicates a multi-disciplinary team analyzed management approaches based on the values framework. Since Melgund has zero local emergency capacity, any management approach selected without heavily weighting this deficit creates an unacceptable risk. We must challenge the Proponent to demonstrate that their preliminary analysis did not falsely assume the existence of municipal services (fire/ambulance) in the host area, as reliance on distant regional hubs (Ignace/ Dryden) for a project of this magnitude is a critical flaw in the design choice.	12.1.3.2 PROCESS OF COLLABORATIVE DEVELOPMENT WITH THE CANADIAN PUBLIC AND INDIGENOUS PEOPLES Phase 2 —Exploring the Fundamental Issues
Environment	Alternatives	Medium	Require the Proponent to disclose the full list of '14 technical methods' and the specific environmental criteria used to exclude options, clarifying whether social preference ('what they heard') or technical safety was the primary filter.	The Initial Project Description states that the technical shortlist was based on methods the Proponent 'heard hold the most promise' during public consultation. This suggests a potential bias where social acceptability may have outweighed geological or environmental safety in the early screening. For Melgund, the integrity of the local watershed and geology is paramount. We must ensure that the 'alternative management approaches' were not narrowed down in a way that discarded safer, but less popular, technical options that might better protect the local environment.	12.1.3.2 PROCESS OF COLLABORATIVE DEVELOPMENT WITH THE CANADIAN PUBLIC AND INDIGENOUS PEOPLES Phase 2 —Exploring the Fundamental Issues
Human Environment (People)	VCs	High	Request a specific demographic breakdown of the '462 Canadians' who participated in the National Citizens Dialogue to confirm if any residents of Melgund (Dyment/Borups Corners) were included.	The Proponent's submission relies on a 'National Citizens Dialogue' to establish the 'six fundamental values' that form the basis of the assessment framework. Melgund is an unorganized territory with unique vulnerabilities, specifically a total lack of local emergency services (no fire, no ambulance, no police). If the 'values' driving the assessment were derived entirely from urban or distant populations who assume the existence of municipal infrastructure, the resulting framework may fail to prioritize the critical safety gaps present in Dyment and Borups Corners. We must validate that 'local safety capacity' is not being overruled by 'national' preferences.	12.1.3.2 PROCESS OF COLLABORATIVE DEVELOPMENT WITH THE CANADIAN PUBLIC AND INDIGENOUS PEOPLES Phase 2 —Exploring the Fundamental Issues
Environment	Baseline	High	Request the specific geophysical datasets and borehole logs used to map the 'inferred' Fracture Zones (FZs) and demand a quantitative definition of rock 'homogeneity' relative to these structural features.	The Proponent's submission bases the safety of the repository placement on 'inferred' geological structures and a general claim of 'homogeneous' rock. For Melgund Township, relying on inference for the primary containment barrier creates uncertainty regarding the site's actual suitability. By demanding the raw data and specific definitions now, the community can verify if the bedrock is truly competent before the project design advances. This ensures that the local environment is protected by verified science rather than assumptions, reducing the risk of discovering disqualifying geological flaws later in the process.	14.2.2 Summary
Environment	Effects Assessment	Medium	Challenge the statement that there is 'no evidence' of landslides or liquefaction by requiring a forward-looking geohazard assessment that models slope stability and ground integrity over the repository's full lifecycle.	The Proponent's submission relies on a lack of current evidence to dismiss major geological risks, which is a 'negative proof' rather than a demonstration of safety. Melgund Township requires positive confirmation that the land will remain stable over thousands of years, particularly given the proximity to 'inferred' fracture zones. Requesting active modeling of these hazards provides the community with evidence-based assurance of long-term land stability, rather than relying on a simple absence of current problems.	14.2.2 Summary

Environment	Effects Assessment	High	Require a definitive methodology and specific 'stop-work' criteria for the investigation of 'potential recent fault activity' and post-glacial faulting.	The text acknowledges that 'uncertainties remain regarding the likelihood and potential impact of post-glacial faulting.' In an unorganized territory with no capacity to mitigate a containment failure, the stability of the bedrock is paramount. The assumption that the region has 'low seismic hazard' must be rigorously proven, not merely monitored. Establishing clear criteria for what constitutes a disqualifying fault hazard is essential to protect the long-term environmental integrity of the land and ensure the DGR does not compromise the physical safety of the area.	14.2.3 Planned Work: Surface Bedrock and Deep Geology and Seismicity
Human Environment (People)	Effects Assessment	Medium	Demand a comprehensive emergency response and management plan specifically for the planned '10 deep boreholes and up to 10 shorter-length exploration boreholes' drilling program.	The Proponent plans significant industrial activity (drilling, logging, testing) involving heavy machinery and crews. Melgund Township is an unorganized territory with zero local emergency services (no fire, police, or ambulance). Any accident, spill, or injury occurring during this exploration phase cannot rely on local capacity, and response times from distant hubs like Ignace or Dryden are significant. The Proponent must demonstrate 100% self-sufficiency for emergency response during these field activities to ensure the physical safety of the community and workers.	14.2.3 Planned Work: Surface Bedrock and Deep Geology and Seismicity
Environment	Baseline	High	Request immediate characterization of 'gently inclined and water-conducting features' in the Revell batholith prior to the Impact Statement, rather than deferring this to future licensing phases.	The Proponent's submission explicitly identifies fractures as the 'primary potential pathway for radionuclide release' yet categorizes the study of their geometry as 'future planned work.' For Melgund Township, where residents rely entirely on untreated local aquifers and surface water, the integrity of the geological barrier is the only protection against contamination. Allowing the Impact Statement to proceed without a validated model of these water-conducting features creates an unacceptable risk of approving a site based on incomplete safety data. This gap must be closed to ensure the baseline data accurately reflects the vulnerability of local water systems.	14.2.3 Planned Work: Surface Bedrock and Deep Geology and Seismicity
Environment	Baseline	Medium	Mandate the integration of surface hydrology data with deep geological models to address the identified gap in 'details of the surface and near-surface environment.'	The filing notes that hydrology details are still needed to 'finalize the design' and 'protect the environment.' It is critical for Melgund to understand the connectivity between surface water bodies (used for fishing and recreation) and the deep geological fracture network. This integration is necessary to predict how potential surface spills during construction or deep leaks during operation might migrate through the environment, ensuring the protection of the watershed that the community relies upon.	14.2.3 Planned Work: Surface Bedrock and Deep Geology and Seismicity
Environment	Baseline	High	Request a statistical justification for the sufficiency of six boreholes to characterize the geochemical homogeneity of the entire repository volume, specifically regarding the 5% subordinate rock types (amphibolite and dykes).	The Proponent's submission relies on a limited dataset (six boreholes) to claim the rock is chemically stable. However, the text acknowledges 5% of the core is 'subordinate rock types' like amphibolite. If these minority rock types contain localized sulphides and are excavated to surface storage, they could generate Acid Rock Drainage (ARD). Melgund Township relies on local groundwater and surface water; the community requires evidence that these 'minor' rock types have been adequately sampled to rule out leaching risks that could contaminate the local watershed.	14.3 Geochemistry of Mined or Excavated Materials
Environment	VCs	Medium	Challenge the reliance on 'matrix porosity' (0.45%) as the primary indicator for radionuclide retardation and request the inclusion of fracture network hydraulic conductivity as a specific Valued Component indicator.	The text cites the low porosity of the rock core as a primary safety feature for retarding radionuclide movement. However, in the Canadian Shield, groundwater and contaminants primarily move through fractures, not the solid rock matrix. Relying solely on matrix porosity could drastically underestimate the speed at which contaminants might reach the surface environment. Correcting this methodology is essential to accurately predict long-term safety for the lands Melgund residents use for traditional activities.	14.3 Geochemistry of Mined or Excavated Materials
Environment	Baseline	Medium	Mandate the immediate inclusion of 'overburden' and 'construction materials' in the geochemical baseline testing program to establish background salinity and metal levels.	The text mentions that testing of overburden and construction materials is merely 'planned' work, yet also notes the intent to test for 'salt' and metals. Since these materials will be disturbed first and stored on the surface, they pose the most immediate risk of runoff during the construction phase. Establishing a verified baseline for these specific materials is necessary to distinguish between project-induced contamination and natural background levels, ensuring the Proponent can be held accountable for any surface water degradation.	14.3 Geochemistry of Mined or Excavated Materials
Environment	Effects Assessment	High	Require the submission of completed kinetic testing and leachate analysis results prior to the Impact Statement, rather than accepting the 'anticipated' non-acid generating outcomes cited in the text.	The Proponent's submission states that kinetic testing is currently 'underway' but prematurely concludes the rock will be non-acid generating. This represents a critical data gap. To protect Melgund's unorganized territory—which lacks the financial or technical resources to manage environmental remediation—the Board must demand actual data proving that the waste rock piles will not leach heavy metals or acid. Relying on predictions without data presents an unacceptable risk to the local environment.	14.3 Geochemistry of Mined or Excavated Materials
Environment	Baseline	Medium	Challenge the Proponent to provide geochemical evidence (e.g., isotopic analysis or regional background comparisons) validating the claim that exceedances of metals (Aluminum, Chromium, Hexavalent Chromium, etc.) in soil and sediment are solely 'natural' and 'reflect the local geology.'	The text dismisses multiple exceedances of soil and sediment quality guidelines as naturally occurring without providing comparative data to rule out historical anthropogenic sources (e.g., forestry or atmospheric deposition). Accepting this assumption without proof creates a liability risk for Melgund; if the DGR project releases these specific metals in the future, the Proponent may point to this unverified baseline to argue the pollution is 'natural.' Rigorous validation is required to protect the community's ability to identify project-induced impacts later.	14.4 Topography, Soil and Sediment
Environment	Baseline	Medium	Request justification for the cessation of topography baseline studies, specifically requiring an analysis of how the 'long, narrow valleys' and 'structural features' identified in the text influence surface drainage toward Mennin Lake.	The Proponent states they consider the topography study 'sufficiently complete' and have 'no planned work.' However, the text notes these valleys drain southwest toward Mennin Lake, a key waterbody for the Melgund area. Given that construction will alter surface topography, a static LiDAR survey is insufficient. The community needs a baseline of *drainage dynamics* within these structural features to ensure that future site runoff does not transport contaminants into the local watershed. This represents an opportunity to secure protection for downstream water users.	14.4 Topography, Soil and Sediment
Environment	Baseline	High	Require the Proponent to re-sample sediments and utilize laboratory methods with detection limits strictly lower than federal/provincial quality guidelines, specifically for polycyclic aromatic hydrocarbons (PAHs) and semi-volatile organic compounds.	The Proponent's submission explicitly admits that 'detection limits were higher than or equal to the available sediment quality guideline,' rendering the current 'below detection' findings scientifically inconclusive. For Melgund Township, which relies on the integrity of local water bodies like Mennin Lake for fishing and recreation, a baseline that cannot detect existing contamination is unacceptable. Without a valid zero-baseline, the community cannot hold the Proponent accountable for future potential leaks or spills, as the Proponent could claim future contamination was pre-existing but undetected. Correcting this ensures a defensible regulatory baseline.	14.4 Topography, Soil and Sediment
Human Environment (People)	Baseline	High	Request a screening-level Human Health Risk Assessment (HHRA) specifically for the 'harvested' ecosites where soil metal exceedances were identified.	The text notes that samples were collected from 'harvested and non-harvested portions' of ecosites and identified exceedances in metals like Chromium and Manganese. In an unorganized territory like Melgund, 'harvesting' often includes the gathering of berries, mushrooms, and medicines by residents. If the baseline soil quality already exceeds safety guidelines in these areas, the community must understand the current health risk to distinguish it from future project impacts. This ensures that the 'Human Environment' baseline accurately reflects the safety of land currently used for subsistence.	14.4 Topography, Soil and Sediment

Environment	Baseline	Medium	Request justification for the limited two-week duration of the seasonal noise monitoring program and assess the need for longer-term continuous monitoring.	The Proponent proposes only two-week snapshots for noise data collection. In the quiet, unorganized territory of Melgund, sound propagation is highly sensitive to specific atmospheric conditions (wind, temperature inversion) that may not be captured in a short window. To protect the acoustic environment of the community, the baseline must robustly account for variability to ensure that the 'quiet' nature of the area is accurately documented before construction begins.	14.5 Atmospheric, Acoustic and Visual Environment
Environment	Baseline	Medium	Request the expansion of the baseline light data collection program to include winter monitoring periods.	The Proponent currently plans light data collection only during the summer. However, Melgund Township experiences long winters where snow cover significantly increases ground albedo (reflectivity), which can drastically amplify artificial light and 'sky glow'. As the area is described as 'intrinsically dark', failing to capture winter conditions will underestimate the potential light pollution impact on the rural character of the unorganized territory. Winter data is essential for a complete environmental assessment.	14.5 Atmospheric, Acoustic and Visual Environment
Human Environment (People)	Baseline	High	Formally dispute the Proponent's conclusion that the visual environment baseline is 'sufficiently complete' and demand a technical Viewshed Analysis.	The Proponent asserts that no further work is needed for the visual baseline based on general habitat descriptions and a single photograph. This is unacceptable for the community of Melgund, where the rural, undeveloped landscape is a primary driver of quality of life and property value. A 'sufficient' baseline must scientifically demonstrate—via Viewshed Analysis—whether the facility will be visible from local residences, the Trans-Canada Highway, or recreational areas, rather than assuming low impact based on vegetation types.	14.5 Atmospheric, Acoustic and Visual Environment
Environment	Baseline	High	Challenge the applicability of using air quality data from Thunder Bay and Winnipeg (240-350 km away) and request detailed validation against the new local 2023 dataset.	The Proponent's submission relies on regional data from cities hundreds of kilometers away to characterize the local airshed. For Melgund Township, which sits between industrial sources in Dryden and Ignace, this distant data is scientifically irrelevant and fails to capture local realities. Establishing a strictly local baseline is critical to ensure that future project emissions are measured against the actual, current air quality of Dyment and Borups Corners, rather than the urbanized baselines of Thunder Bay. This ensures accurate impact predictions for local residents.	14.5 Atmospheric, Acoustic and Visual Environment
Environment	Baseline	High	Challenge the sufficiency of the hydrogeological baseline, specifically the reliance on only five deep groundwater samples to characterize the entire repository block.	The Proponent's submission admits that deep groundwater chemistry measurements are limited due to low flow. However, relying on such a small dataset to validate the 'stable hydrogeological environment' creates a risk that significant fracture zones or fast-flow pathways have been missed. For Melgund Township, ensuring the absolute isolation of the repository from the regional water table is critical. This recommendation demands a more robust data set to prove the 'porous medium' model is accurate for this specific site, preventing potential long-term contamination risks that could affect the broader watershed.	14.6 Groundwater and Surface Water
Human Environment (People)	Baseline	High	Request a baseline Human Health Risk screening regarding the reported E. coli and Mercury exceedances in local watercourses (Mennin and Wabigoon rivers) to assess safety for recreational and subsistence use.	The Proponent's submission notes bacteriological and metal exceedances in rivers that are likely utilized by Melgund and Dyment residents for fishing, swimming, or other traditional uses. As an unorganized territory with no local health services, the community is highly vulnerable to environmental health hazards. The Working Group must determine if these 'baseline' levels currently pose a risk to residents. This task ensures that the definition of 'community well-being' accurately reflects the current safety of the local environment before the project adds potential cumulative stressors.	14.6 Groundwater and Surface Water
Environment	Baseline	Medium	Request a detailed 'Source Identification Study' for the reported exceedances of E. coli, mercury, and copper in the Mennin and Wabigoon rivers.	The Proponent's submission identifies these exceedances but simultaneously characterizes the water quality as 'normal' and 'indicative of healthy ecosystems.' This contradiction must be resolved. Melgund needs a definitive baseline to distinguish between naturally occurring background levels and potential future project impacts. If these exceedances are not fully understood now, the Proponent could later claim that any future contamination was 'pre-existing.' This task ensures the community has a defensible regulatory baseline to protect local water bodies.	14.6 Groundwater and Surface Water
Environment	Baseline	High	Request the specific geological and spatial rationale for the location of the three shallow well 'nests' and six deep boreholes to validate their representativeness for the 2024-2025 groundwater model.	The text states that an initial groundwater model will be developed based on a limited number of data points (three nests, six boreholes). In the complex shield geology of the Melgund area, there is a risk that these points do not capture critical fracture zones or hydraulic connections. Without understanding the 'why' behind these specific locations, the community cannot accept the resulting model as accurate. Demanding this justification ensures the model reflects the actual risks to the local aquifer rather than just convenient data points, thereby improving the technical rigour of the Impact Statement.	14.6.2 Planned Work: Hydrogeology and Hydrogeochemistry
Environment	Baseline	Medium	Request clarification on the source and location of the 'treated sewage effluent' parameters (e.g., total coliforms) currently being monitored in the surface water quality program.	The inclusion of sewage effluent parameters in the baseline study implies active discharge, likely from exploration camps. Since Melgund is an unorganized territory without municipal wastewater infrastructure, any discharge into local water bodies is a direct concern for downstream users. Identifying the specific source and discharge points allows the community to verify that current exploration activities are not degrading local water quality. This transparency is essential for maintaining a social license to operate during the pre-licensing phase.	14.6.2 Planned Work: Hydrogeology and Hydrogeochemistry
Environment	Baseline	High	Challenge the sufficiency of using 'gross alpha and gross beta' as the primary radiological indicators and formally request the inclusion of specific isotopes (e.g., Iodine-129, Cesium-137) in the baseline water quality program.	The Proponent's submission relies on 'gross' screening measurements for radionuclides. For Melgund Township, where residents rely entirely on local surface and well water, this is strategically inadequate. 'Gross' counts cannot distinguish between natural background radiation and potential future project-related contamination. To protect the community's future interests, we must establish a forensic-level baseline of specific nuclear fuel isotopes now. This ensures that if a leak occurs in the future, the Proponent cannot dismiss it as 'natural variation.' Adopting this recommendation provides a definitive scientific benchmark, improving the project's safety accountability and community trust.	14.6.2 Planned Work: Hydrogeology and Hydrogeochemistry
Environment	Baseline	Medium	Require detailed technical protocols for how the 'groundwater-surface water interface' will be characterized and monitored, beyond the general description provided.	The text mentions monitoring this interface to 'support overall understanding,' but lacks methodological detail. This interface is the critical pathway where deep geological contaminants would theoretically enter the biosphere (lakes and rivers used by locals). As an unorganized territory with no municipal water treatment, Melgund residents consume this water directly. We must ensure the Proponent is using the most sensitive detection methods available at these discharge points. Clarifying this protocol presents an opportunity to demonstrate rigorous environmental stewardship and ensures the protection of the local food web and water supply.	14.6.2 Planned Work: Hydrogeology and Hydrogeochemistry
Environment	VCs	Medium	Challenge the methodology used to claim the Project site has 'lower biodiversity' than the surrounding region, specifically the reliance on marsh density as the sole proxy for biodiversity value.	The Proponent's submission asserts that because the site has fewer marshes than the region, it likely has lower biodiversity. However, the text explicitly admits that 'AHM and eDNA surveys were not targeted in the surrounding region.' This is a significant data gap used to devalue the local ecosystem. Melgund must reject the assumption that our local territory is of 'lower value' based on incomplete comparative data. We require a robust, data-driven comparison to ensure the site is not being framed as a 'sacrifice zone' simply because it lacks one specific wetland type.	14.7 Vegetation, Riparian and Wetland Environment

Environment	Baseline	High	Require immediate physical field verification (netting/trapping) of the American eel (Anguilla rostrata) to confirm the eDNA detection mentioned in Section 14.7.1.	The Proponent's submission identifies the 'potential' presence of the American eel, a federally Endangered and provincially Threatened species, via eDNA, yet notes this is outside its known distribution. Relying on eDNA without physical confirmation creates regulatory uncertainty. For Melgund, the confirmed presence of an Endangered species would trigger stringent federal protections and potentially alter the project's viability or layout. We must demand definitive proof of presence/absence immediately to avoid basing the Impact Statement on theoretical data.	14.7 Vegetation, Riparian and Wetland Environment
Human Environment (People)	Effects Assessment	High	Request a detailed impact analysis on the specific wild rice stands (Mennin Lake and 10 others) and medicinal plant locations (balsam fir/poplar) identified in the text, specifically regarding access and contamination risks.	The text acknowledges these species are of interest to rights holders and were found within the Project site. However, mere identification is insufficient. Melgund and its neighbors rely on the land for traditional harvesting and cultural practices. The Proponent must demonstrate how the project footprint will avoid destroying these specific stands or severing access to them. We need to move from a list of species to a map of 'protected harvest areas' to ensure community well-being and cultural heritage are preserved.	14.7 Vegetation, Riparian and Wetland Environment
Environment	Effects Assessment	Medium	Reject the justification that local wetland loss is acceptable because 'northern Ontario is not considered a region... where wetland loss... has reached critical levels.'	The text attempts to minimize the impact of destroying 17% of the site's wetland cover by citing the abundance of wetlands in the broader Northern Ontario region. This 'regional abundance' argument dilutes the significance of local impacts. For Melgund, these specific wetlands provide local water filtration and flood regulation. We must demand a functional assessment of the specific wetlands on-site (swamps/fens) rather than allowing them to be written off as statistically insignificant against the provincial backdrop.	14.7 Vegetation, Riparian and Wetland Environment
Environment	Baseline	Medium	Request immediate physical ground-truthing (netting or electrofishing) for the 26 species detected solely via eDNA metabarcoding in the Regional and Local Investigation Areas.	The Proponent admits that 26 species were detected via eDNA but have not been visually confirmed. eDNA can be transported downstream or result from transient presence, which does not accurately reflect resident populations or habitat usage. For the community, accurate knowledge of which fish actually inhabit the local Mennin and Revell river systems is vital for establishing a defensible baseline. Without physical confirmation, the Proponent's risk assessment may underestimate the biodiversity of the waters directly adjacent to the community.	14.8 Fish and Fish Habitat
Environment	Baseline	High	Challenge the Proponent's conclusion that 'no potentially important fish habitat' exists within the Project site, specifically requesting winter field surveys to validate the claim of 'no overwintering habitat' in local watercourses.	The Proponent's submission relies heavily on desktop reviews and 'existing databases' to claim an absence of overwintering habitat in the Local Investigation Area. For Melgund Township, 'absence of evidence' in a database is not 'evidence of absence' in the field. If the Proponent designs the site discharge or water crossings assuming no fish are present during winter, they risk causing irreversible harm to undocumented local populations. Requiring multi-season field verification ensures the baseline reflects the actual ecological reality of the unorganized territory's watercourses, rather than just historical data gaps.	14.8 Fish and Fish Habitat
Environment	Effects Assessment	Medium	Require a dynamic impact assessment that models fish passage scenarios assuming the natural failure or removal of the identified 'beaver dam' barriers.	The Proponent identifies numerous beaver dams as 'barriers' that currently prevent fish from accessing the Project site. However, beaver dams are ephemeral and subject to natural washout. If the Proponent's assessment assumes these barriers are permanent, they may falsely conclude that fish cannot migrate into the impact zone over the project's multi-decade lifespan. Melgund requires an assessment that accounts for the dynamic nature of local waterways, ensuring that future fish migration into the site is considered in the safety case.	14.8 Fish and Fish Habitat
Human Environment (People)	Baseline	High	Request a specific socio-economic usage study regarding the 'wild rice stand identified on the north shore of Mennin Lake,' which the filing notes 'may be important as a food supply for... local community members.'	The Initial Project Description explicitly links an environmental resource (wild rice) to human consumption ('local community members'). As Melgund is an unorganized territory where residents often rely on land-based resources for subsistence and tradition, this specific resource represents a critical intersection of environmental health and community well-being. The Board must ensure this usage is fully characterized—quantifying who harvests it and how much—to prevent the uncompensated loss of a local food source. Protecting this resource is an opportunity to demonstrate respect for local land use and food security.	14.9 Birds, Migratory Birds and their Habitat
Environment	Baseline	High	Challenge the Proponent's assertion that 2021-2022 baseline results based on 'desktop... mapping' and 'eDNA sampling' are 'sufficiently comprehensive,' specifically citing the admission in the text that eDNA interpretation is 'difficult due to limited data.'	The Proponent's submission relies heavily on modelling and novel techniques (eDNA) rather than traditional field observation for the initial assessment. While the text admits that future work (point counts, acoustic surveys) is needed, it attempts to validate 'early conclusions' based on incomplete desktop data. For the Melgund area, establishing a robust, field-verified baseline is essential to accurately monitor future impacts. Accepting conclusions based on desktop data creates a risk of unmeasured baseline conditions, making it impossible to prove project-induced changes later. The Board must demand that the 'Planned Work' (field surveys) be completed to validate the models before the baseline is accepted.	14.9 Birds, Migratory Birds and their Habitat
Environment	Effects Assessment	Medium	Require the assessment of 'functional' critical habitat for Species at Risk (specifically Eastern Whip-poor-will) rather than limiting the scope to legally 'designated' critical habitat.	The Proponent's submission notes the presence of Eastern Whip-poor-will but states there is 'no critical habitat... designated' in federal recovery strategies. This legalistic approach ignores biological reality; if the site contains the biophysical attributes necessary for the species' survival, it functions as critical habitat regardless of its current legal status. To ensure the project does not degrade the local ecosystem, the assessment must protect habitat that serves the *function* of critical habitat, ensuring the long-term biodiversity of the Melgund area is preserved despite regulatory lags in federal designations.	14.9 Birds, Migratory Birds and their Habitat
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate a fully self-sufficient security and policing plan to satisfy the commitment to MMIWG Call for Justice #13, without reliance on local resources.	The Proponent commits to actioning MMIWG Call for Justice #13 regarding 'Extractive and Development Industries,' which highlights the safety risks to women and vulnerable groups during major projects. Melgund Township is an unorganized territory with zero local police presence; reliance on distant OPP detachments in Ignace or Dryden creates unacceptable response times for these heightened risks. To fulfill this safety commitment, the Proponent must provide 100% of the necessary security capacity onsite, rather than downloading this risk onto a community with no protective services.	Acknowledgment of Truths
Human Environment (People)	Baseline	High	Require the immediate collection and inclusion of socio-demographic data for Melgund Township to rectify the admitted lack of representation for unincorporated communities in the Initial Project Description.	The Proponent's submission explicitly admits that current data does 'not a full representation of the characteristics... of populations residing within... unincorporated communities.' As Melgund is the primary unincorporated territory hosting the project, this data gap renders any socio-economic impact assessment invalid. We cannot assess impacts on housing, social cohesion, or services if the baseline population data is acknowledged as incomplete. Correcting this ensures the Local Services Board is accurately represented in the regulatory record.	Acknowledgment of Truths
Environment	Effects Assessment	Medium	Request a detailed map and operational definition of the 'changes in access' to land and water referenced in the Proponent's submission.	The filing states that the Project will impact land use through 'changes in access.' While framed in the context of traditional use, any restriction on land or water access directly affects Melgund residents who rely on the surrounding Crown land for recreation and subsistence. The community requires a precise definition of which areas will be restricted, for how long, and how this loss of access will be mitigated, ensuring that the 'enduring relationship' with the land mentioned by the Proponent does not result in the exclusion of local residents.	Acknowledgment of Truths

Human Environment (People)	VCs	High	Contest the exclusion of off-site transportation from the Project scope, specifically the statement that 'transportation of used fuel... beyond primary and secondary access roads' is regulated separately.	The Proponent's submission attempts to decouple highway transportation from the project assessment. For Melgund, which is bisected by Highway 17, the transport of nuclear fuel is the primary risk vector. Excluding this prevents a holistic evaluation of accident risks and emergency response needs in an area with no local services. Including this as a Valued Component is critical to ensuring the safety of residents in Borups Corners and Dyment is adequately assessed and mitigated.	Executive Summary
Human Environment (People)	Effects Assessment	Medium	Assess the social and safety impacts of the 'worker accommodation camp' on the unorganized territory, specifically regarding policing and social friction.	The Proponent's submission includes the construction and operation of a worker accommodation camp. While 'strict behavioural policies' are mentioned, the influx of a transient workforce into an unorganized territory with no local police presence poses a significant safety and social cohesion risk. The Proponent must demonstrate how they will enforce these policies without burdening the limited Ontario Provincial Police resources currently serving the region.	Executive Summary
Human Environment (People)	Effects Assessment	Medium	Require a quantitative socio-economic assessment of the 'perception' impacts on land use mentioned in the submission, specifically focusing on property values and tourism in Melgund.	The Proponent's submission admits that the project will result in changes to 'how surrounding lands and waters are used due to perception.' For Melgund, where the economy relies on highway traffic and rural residency, 'perception' or stigma can cause tangible economic loss. The Proponent must move beyond acknowledging this as a possibility and provide a concrete plan to quantify and compensate for stigma-induced economic decline in the immediate vicinity of the project.	Executive Summary
Environment	Effects Assessment	Medium	Demand site-specific noise and vibration modeling for receptors in Dyment and Borups Corners regarding the proposed 'blasting and excavation' activities.	The Proponent's submission lists 'blasting and excavation' as activities and proposes generic mitigation like 'temporary barriers.' Given the proximity of Melgund residents to the site, generic measures may be insufficient. Modeling specific to local receptors is necessary to ensure that the 'noise and vibration management' plans effectively protect the quality of life for the nearest neighbours, rather than just meeting regulatory limits at the fence line.	Executive Summary
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate full self-sufficiency regarding the 'emergency preparedness and response plans' cited in the submission, specifically for fire, medical, and spill response.	The Proponent's submission lists emergency response plans as an enforceable requirement. However, Melgund Township (Dyment/Borups Corners) is an unorganized territory where the Community has no local capacity; reliance on distant regional services creates unacceptable risk. The Proponent must provide 100% of emergency capacity on-site rather than assuming support from non-existent local departments or relying on response times from Ignace (43km) or Dryden. This ensures the project does not leave local residents vulnerable during a critical incident.	Executive Summary
Environment	Baseline	High	Request specific baseline data and discharge modeling for 'treated effluent release' and 'water collection ponds' relative to Melgund's water sources.	The Proponent's submission mentions the release of treated effluent and the management of surface water. As Melgund residents rely heavily on local surface water and groundwater without municipal treatment systems, any downstream flow or aquifer interaction presents a direct risk. Establishing a rigorous baseline ensures that the Proponent can be held accountable for any degradation in water quality that could impact the unorganized territory's drinking water supply.	Executive Summary
Human Environment (People)	VCs	High	Challenge the confidentiality of the 'Hosting Agreement' specifically regarding provisions for regional emergency response, infrastructure maintenance, and community safety definitions.	The text states the Hosting Agreement is confidential. However, Melgund has **ZERO** local emergency services (No Fire, No Ambulance). If this agreement defines the project's safety capacity or assumes reliance on regional assets, the confidentiality prevents Melgund from assessing critical risks. The Proponent must disclose whether the agreement provides for 100% self-sufficient emergency response or if it leaves neighboring unorganized territories vulnerable. We cannot accept a 'willingness' framework that hides safety capacity details from immediate neighbors who lack their own services.	Building Relationships with Anishinaabe Peoples of Wabigoon Lake Ojibway Nation and Other Indigenous Groups in Canada
Human Environment (People)	Effects Assessment	High	Request the specific operational details of the 'social safety' framework and the implementation plan for 'Call for Justice 13' regarding extractive industries, as cited in the Proponent's submission.	The Proponent's submission acknowledges the 'ongoing risks' associated with 'extractive and development industries' and commits to a 'social safety' framework. However, Melgund Township (Dyment/Borups Corners) is an unorganized territory with **ZERO** local police presence. The influx of a transient workforce presents a critical safety risk that cannot be managed by distant regional detachments (Ignace/Dryden). The Proponent must demonstrate self-sufficiency in security and policing capacity, as the community has no local resources to absorb these social risks. This gap must be addressed to ensure the physical safety of residents.	Building Relationships with Anishinaabe Peoples of Wabigoon Lake Ojibway Nation and Other Indigenous Groups in Canada
Environment	Baseline	High	Request the quantitative hydrogeological baseline data that underpins the 'Water Statement' and the 'integrative narrative' regarding the 'interconnected systems of water' described in the filing.	The Proponent's submission emphasizes a narrative approach to water protection ('agency of water') and an 'integrative narrative' combining Indigenous Knowledge and Western science. While this perspective is noted, Melgund residents rely exclusively on private wells for drinking water. It is critical to validate that the 'interconnected systems' analysis explicitly includes the specific aquifers feeding Dyment and Borups Corners. We must ensure that the 'narrative' is supported by hard technical data to guarantee that the 'multiple-barrier system' provides absolute protection for local water sources.	Building Relationships with Anishinaabe Peoples of Wabigoon Lake Ojibway Nation and Other Indigenous Groups in Canada
Human Environment (People)	VCs	High	Formally oppose the Proponent's submission that IAA Section 7 prohibitions should not apply to social and economic programs, unless Melgund is granted equivalent status to Host Communities in NFWA reporting.	The Proponent argues that existing NFWA reporting and 'Hosting Agreements' with Ignace and WLON are sufficient to manage social impacts. However, Melgund Township is not a signatory to a Hosting Agreement and is excluded from the NFWA governance mechanisms described in the text. Exempting these programs from IAA oversight would leave Melgund without a regulatory mechanism to address specific socio-economic impacts, such as property devaluation or community well-being, as the Proponent's internal mechanisms only account for 'Host' communities.	i. Statutory Regulatory and Oversight Framework for the Project
Human Environment (People)	Effects Assessment	High	Challenge the Proponent's stated 'emergency preparedness and response plans' to demonstrate 100% on-site self-sufficiency, explicitly prohibiting reliance on Melgund's local resources.	The Proponent's submission references future emergency plans and compliance with the CNSC licence. However, Melgund Township is an unorganized territory with zero local emergency services (no fire, ambulance, or police). Community has no local capacity; reliance on distant regional services (Ignace/Dryden) creates unacceptable risk. The Proponent must provide 100% of emergency capacity to ensure safety without burdening a community that lacks the infrastructure to respond.	i. Statutory Regulatory and Oversight Framework for the Project
Environment	Baseline	Medium	Require the establishment of specific baseline monitoring stations within Melgund Township boundaries for the 'evaluation of potential changes to air, water, land' referenced in the Impact Statement methodology.	The Initial Project Description focuses heavily on the 'WLON and Ignace siting area' for data collection and governance. As the immediate geographic neighbor to the Revell site, Melgund requires distinct baseline data to accurately measure future 'radioactive and hazardous releases to water and air' against local pre-project conditions. Without specific local data, impacts to Melgund's environment may be masked by regional averages or data centered on the host communities.	i. Statutory Regulatory and Oversight Framework for the Project
Human Environment (People)	Baseline	Medium	Request a redacted summary of the 'confidential' Wabigoon Lake Ojibway Nation (WLON) Hosting Agreement specifically regarding regional safety and infrastructure commitments.	The Proponent states that the WLON agreement 'remains confidential' yet serves as a 'governing mechanism' for the project that reflects 'social, economic, and cultural aspirations.' For Melgund Township, it is critical to understand if this agreement commits shared regional resources or infrastructure that could impact the unorganized territory. Transparency is required to ensure that the 'shared responsibility' mentioned in the text does not inadvertently displace risks onto Melgund residents who are not party to the agreement.	i. Statutory Regulatory and Oversight Framework for the Project

Human Environment (People)	Baseline	High	Challenge the Proponent's definition of 'Host' which explicitly names 'Wabigoon Lake Ojibway Nation and the Township of Ignace' while excluding the Local Services Board of Melgund (Dyment/Borups Corners), and request a specific 'Willingness Assessment' for the unorganized residents at the project site.	The Proponent's submission validates the project based on the 'willingness' and 'Hosting Agreements' of Ignace and WLON. However, the physical project is located within or immediately adjacent to Melgund. As an unorganized territory, Melgund lacks the municipal structure to sign the 'Hosting Agreements' cited in the text. Relying on the consent of a distant municipality (Ignace) while ignoring the immediate unorganized residents creates a significant governance gap. This recommendation is critical to ensure that the 'consent-based' process mentioned in the text actually includes the residents who live at the physical site, preventing the disenfranchisement of Dyment and Borups Corners.	ii. The Nuclear Waste Management Organization and Selection of Adaptive Phased Management
Environment	Baseline	Medium	Citing the 'technical evaluation' referenced in the text as a driver for site confirmation, request the specific geological and hydrological baseline reports for the Revell Site area that supported this decision.	The Initial Project Description states that 'technical evaluation' was a key component in confirming the site alongside community willingness. To validate this claim, the Environment Working Group requires the specific technical data (rock mechanics, groundwater flow) for the Melgund area. This is necessary to verify that the 'Deep Geological Repository' concept is scientifically viable in this specific local geology, ensuring that the selection was not based solely on the social 'willingness' of the named host communities.	ii. The Nuclear Waste Management Organization and Selection of Adaptive Phased Management
Human Environment (People)	Effects Assessment	High	Reference the Proponent's claim that 'Protecting people... must remain the highest priority' and request a 'Service Capacity Gap Analysis' specifically for Melgund, addressing the total absence of local emergency services (Fire/Ambulance) in the unorganized territory.	The text asserts that protecting people is the highest priority of the APM process. However, Melgund (Dyment/Borups Corners) has zero local emergency services and relies on distant regional hubs. If the project relies on the 'Hosting Agreements' with Ignace (as mentioned in the text) for safety resources, response times to the actual site in Melgund will be inadequate due to distance. The Proponent must demonstrate self-sufficiency to fulfill the 'highest priority' safety claim, as the community cannot rely on non-existent local departments or distant 'Host' resources for immediate emergency response.	ii. The Nuclear Waste Management Organization and Selection of Adaptive Phased Management
Human Environment (People)	Effects Assessment	High	Request a quantitative projection of the 'returning home' population mentioned in the submission and analyze the cumulative impact on regional emergency service hubs (Ignace/Dryden).	The Proponent's submission explicitly states that off-reserve members are expressing a desire to 'return home' to raise families on the land. Melgund Township (Dyment/Borups Corners) is an unorganized territory with zero local emergency capacity (no fire, ambulance, or police), relying entirely on regional hubs in Ignace and Dryden. An unquantified influx of population into the region will strain these shared services, potentially increasing response times for Melgund residents during emergencies. It is critical to challenge the Proponent to demonstrate how this demographic shift will be managed without degrading the already fragile safety net for the unorganized communities.	iii. Wabigoon Lake Ojibway Nation Story
Environment	Baseline	Medium	Request the immediate disclosure of the specific 'technical studies' regarding land, air, and water referenced as part of the WLON learning journey.	The Proponent's submission cites over a decade of 'technical studies' that informed the community's decision regarding responsibilities to 'land, air, water.' As Melgund shares the immediate watershed and airshed with the proposed project site, this pre-existing data is vital for establishing a comprehensive regional baseline. Accessing these studies allows the Environment Working Group to validate whether the 'proven safe' conclusion accounts for the specific geological and hydrological conditions relevant to Dyment and Borups Corners, rather than relying solely on the Proponent's summary assertions.	iii. Wabigoon Lake Ojibway Nation Story
Human Environment (People)	VCs	High	Clarify the definition of 'Safety' within the Regulatory Assessment and Approval Process (RAAP) and how it integrates with the safety requirements of non-Indigenous neighbors.	The text introduces the RAAP as a jurisdictional process where determinations hinge on 'safety' and 'Anishinaabe Values.' While respecting WLON's sovereignty, Melgund residents need assurance that this parallel regulatory framework does not supersede or conflict with federal safety standards required to protect unorganized territories. Specifically, the Working Group must determine if the RAAP's safety criteria include the physical safety and emergency response realities of Dyment and Borups Corners, or if the Proponent is operating under two distinct safety standards.	iii. Wabigoon Lake Ojibway Nation Story
Environment	Baseline	Medium	Challenge the Proponent's reliance on 'Two previous environmental assessments' to justify safety; require site-specific geological and hydrological baseline data for the Revell site.	The Proponent's submission asserts that DGR technology is 'safe and acceptable' based on conclusions from previous, non-local environmental assessments. This generalization ignores the specific geological and hydrological reality of the Revell site. For Melgund residents who rely on local aquifers, safety cannot be inferred from external literature. The Environment Working Group must demand that safety conclusions be drawn exclusively from local baseline data to ensure the protection of the specific land and water resources in the project area.	iv. Township of Ignace Story
Human Environment (People)	Effects Assessment	High	Regarding the 'Infrastructure' pillar cited in the Ignace Hosting Agreement, demand the Proponent demonstrate 100% emergency response self-sufficiency (Fire, Ambulance, Security) specifically for the Revell site.	The Proponent's submission lists 'Infrastructure' as a foundational pillar for the Township of Ignace, implying a reliance on municipal capacity. However, Melgund Township (Dyment/Borups Corners) is an unorganized territory with **zero** local emergency services. There is no local fire department or ambulance service to coordinate with. Reliance on distant regional hubs (Ignace or Dryden) creates unacceptable risk regarding response times for accidents occurring within Melgund's boundaries. The Proponent must prove they will not rely on non-existent local capacity, ensuring the project is entirely self-sufficient in emergencies to protect the safety of immediate neighbors.	iv. Township of Ignace Story
Human Environment (People)	VCs	High	Request the inclusion of 'Unorganized Territory Well-being' as a distinct Valued Component, separate from the Township of Ignace's 'six foundational pillars'.	The Initial Project Description frames community well-being almost exclusively through the lens of the Township of Ignace and its specific Hosting Agreement. Melgund Township, as the immediate physical neighbor, is excluded from these 'foundational pillars' (People, Economics, Infrastructure). This creates a critical gap where the socio-economic impacts on the unorganized territory—which lacks the municipal mechanisms to manage 'anchor institution' benefits—are overlooked. Establishing this VC ensures that the specific vulnerabilities of Dyment and Borups Corners are assessed independently of Ignace's municipal success metrics.	iv. Township of Ignace Story
Environment	Baseline	High	Request the inclusion of private residential wells in Dyment and Borups Corners as specific monitoring locations within the water quality baseline program.	The text emphasizes the 'sacred' nature of water and co-development with WLON. While cultural protection is vital, the residents of Melgund rely exclusively on private wells for potable water. The Proponent must establish rigorous scientific baselines for these specific water sources to ensure that any potential contamination from the repository or construction activities can be accurately detected and distinguished from pre-existing conditions. This provides necessary technical assurance to the host community and protects property owners.	3.2 Key Issues Raised in Engagement Activities to Date
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% self-sufficiency in emergency response capabilities, specifically regarding the proposed 'firewater pipeline' and fire protection infrastructure.	The Proponent's submission discusses collaborating with WLON's emergency team for fire protection. However, Melgund Township is an unorganized territory with zero local emergency services (no fire, ambulance, or police). Reliance on distant hubs like Ignace or Dryden creates unacceptable response time risks, and the community has no capacity to support the project. The Proponent must provide a fully self-contained emergency response plan that does not depend on non-existent local capacity. This ensures the safety of the immediate community is not compromised by the project's industrial risks and establishes a clear boundary of liability.	3.2 Key Issues Raised in Engagement Activities to Date

Environment	Alternatives	Medium	Request technical specifications for the management of excavated rock to control dust and leachate, distinct from the proposed cultural handling protocols.	The submission outlines WLON's role in guiding the 'respectful handling' of excavated rock. From a regulatory standpoint for Melgund, the primary concern is the physical impact of waste rock piles on air quality (dust) and groundwater (leaching). The Proponent must demonstrate how technical mitigation measures will be implemented alongside cultural protocols to prevent environmental degradation in the immediate vicinity of the township. This ensures that 'respectful handling' also equates to environmental safety for neighbors.	3.2 Key Issues Raised in Engagement Activities to Date
Human Environment (People)	VCs	Medium	Request the inclusion of 'Non-Indigenous Local Land Use' as a distinct Valued Component to assess impacts on hunting, agriculture, and recreation in Melgund.	The text highlights the protection of 'traditional lands' and 'access to significant sites' for Indigenous groups. Melgund residents also utilize the land for hunting, agriculture, and recreation. To ensure equitable assessment, the Proponent must explicitly recognize and assess the potential displacement or disruption of local non-Indigenous land use patterns, ensuring that the 'loss of access' mentioned in the text is quantified for all residents. This ensures the Impact Statement reflects the full reality of land use in the project area.	3.2 Key Issues Raised in Engagement Activities to Date
Human Environment (People)	Effects Assessment	High	Request a detailed Security and Social Impact Management Plan for the Worker Accommodation Camp that specifically addresses the lack of local policing in the unorganized territory.	The IPD mentions designing the camp to reflect 'community values' and including cultural monitors. However, it fails to address the safety implications for Dyment and Borups Corners, which lack a local police force. The introduction of a transient workforce requires a robust, proponent-funded security strategy to prevent strain on the limited regional OPP resources and ensure the physical safety of local residents. This recommendation is crucial to prevent social disruption and ensures the Proponent takes responsibility for the social byproducts of their workforce.	3.2 Key Issues Raised in Engagement Activities to Date
Human Environment (People)	Effects Assessment	High	Assess the impact of project-related traffic increases on Highway 17 specifically regarding accident response times for Melgund residents.	The text acknowledges potential impacts from 'traffic.' Since Melgund has no local police or ambulance and relies on distant services from Dryden or Ignace, any increase in traffic volume or congestion directly degrades the safety of local residents by delaying emergency response times. The Proponent must quantify this risk specifically for the unorganized territory, rather than aggregating it into a regional traffic study.	4. Public and Interested Parties Engagement
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% self-sufficiency for emergency response at the Revell site, rather than relying on the support for Ignace emergency services mentioned in the Hosting Agreement.	The Proponent's submission explicitly states that under the Hosting Agreement with Ignace, the NWMO will 'support emergency services.' However, Melgund Township (Dyment/ Borups Corners) is an unorganized territory with zero local emergency capacity (no fire, ambulance, or police). Relying on Ignace-based services—which are geographically distant—creates an unacceptable risk for the immediate neighbors in Melgund. The Proponent must prove they can manage site emergencies without drawing on regional assets that are too far away to protect Dyment residents effectively. This ensures the project does not burden the nonexistent local safety net.	4. Public and Interested Parties Engagement
Human Environment (People)	Baseline	High	Request a specific baseline assessment of housing and infrastructure capacity within the unorganized territory of Melgund, distinct from the Ignace-focused data.	The Initial Project Description acknowledges 'concerns about existing housing shortages' and 'increased demand on infrastructure.' While Ignace has municipal infrastructure, Melgund relies on private wells and septic systems. If the project causes a workforce spillover into the unorganized territory due to housing shortages in Ignace, it could collapse the fragile private infrastructure of Dyment and Borups Corners. A specific baseline is required to prevent unmitigated strain on the unorganized territory's limited resources.	4. Public and Interested Parties Engagement
Environment	Baseline	Medium	Require the establishment of baseline monitoring stations for noise, vibration, and air quality specifically located at residential receptors in Dyment and Borups Corners.	The text cites 'potential impacts on air... including from construction, traffic, and noise' as key issues. As the closest residential neighbors to the Revell site (closer than the 'Host' community of Ignace), Melgund residents will face the highest intensity of these physical disturbances. General regional baselines are insufficient; site-specific data at Melgund residences is required to ensure that future monitoring reflects the actual experience of the most affected neighbors.	4. Public and Interested Parties Engagement
Human Environment (People)	VCs	Medium	Request the inclusion of 'Social Cohesion in Unorganized Territories' as a specific Valued Component, citing the exclusion of Melgund from the 'Willingness' vote described in Section 4.1.	The submission highlights the 'community vote' in Ignace as a metric of acceptance but lists Melgund merely as an 'interested party' in Table 4.1. This exclusion creates significant social friction and stigma in the unorganized territory, which is geographically closer to the site than the voting municipality. By defining this as a Valued Component, the Proponent must formally assess how this procedural exclusion impacts the well-being and cohesion of the non-voting neighbors.	4. Public and Interested Parties Engagement
Environment	Baseline	High	Require immediate, independent baseline thermal and ecological profiling for Mennin Lake, Lowery Lake, Church Lake, and Long Lake to address stated concerns regarding 'lake temperatures' and 'aquatic ecosystems.'	The Proponent's submission explicitly identifies potential risks to these specific water bodies, including temperature changes and impacts on fish populations. These lakes are integral to the local ecosystem and the lifestyle of Melgund residents. Establishing a credible, third-party verified baseline prior to any site activity is essential to distinguish future Project-related effects from natural variations, ensuring that the Proponent can be held accountable for any degradation of local water quality.	4.3.2 Areas of Focus and Shared Commitments with the Township of Ignace
Environment	Baseline	High	Formalize a comprehensive well-water sampling program for all residents in the vicinity to establish pre-project baselines for uranium and naturally occurring radionuclides.	The text highlights the importance of credible baseline data to distinguish Project-related effects from background levels, noting prior studies of elevated radioactivity in some wells. Melgund residents rely exclusively on private wells for drinking water. Without a rigorous, verified pre-project baseline, the community is vulnerable to future contamination disputes. This program ensures that the 'health' of the local aquifer is documented and protected before construction begins.	4.3.2 Areas of Focus and Shared Commitments with the Township of Ignace
Human Environment (People)	Alternatives	High	Request a detailed comparative safety analysis of the proposed vertical shaft design versus a ramp access system, specifically addressing the 'evacuation options' and 'fire scenarios' cited in the submission.	The Initial Project Description notes significant community concern regarding the absence of a ramp and the reliance on shafts for egress. As the closest residents to the facility, Melgund community members bear the highest risk in the event of an underground emergency. A ramp provides redundant evacuation capabilities that shafts do not. Validating this design choice is critical to ensuring the physical safety of the workforce and the security of the facility, which directly impacts the safety perception and reality for nearby residents.	4.3.2 Areas of Focus and Shared Commitments with the Township of Ignace
Human Environment (People)	Effects Assessment	Medium	Demand specific safety case documentation defining separation distances and scheduling restrictions for concurrent blasting and waste emplacement operations.	The submission notes concerns regarding the potential for blasting to occur while used fuel is being emplaced. This operational overlap poses a unique safety risk involving vibration and potential rockfall near nuclear waste containers. For residents of Melgund living near the site, strict regulatory oversight of these 'safety verifications' is required to prevent catastrophic accidents. Clarifying these protocols is an opportunity to improve operational safety standards and provide assurance to the community.	4.3.2 Areas of Focus and Shared Commitments with the Township of Ignace
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate full emergency response self-sufficiency at the Revell site, specifically addressing the text's reference to 'how local emergency personnel will be trained and resourced.'	The Proponent's submission discusses extending emergency planning to neighbouring communities and training local staff. However, Melgund Township is an unorganized territory with zero local emergency services (no fire, ambulance, or police). The community has no local capacity to be 'trained' or 'resourced.' Reliance on distant regional services (Ignace/ Dryden) creates unacceptable risk for immediate neighbors. The Proponent must provide 100% of emergency capacity on-site rather than assuming local infrastructure exists to support their operations.	4.3.2 Areas of Focus and Shared Commitments with the Township of Ignace

Human Environment (People)	Baseline	Medium	Clarify the role of Medical Officers of Health, specifically regarding the distinction between 'sharing the safety case' and conducting independent health assessments.	The text describes health officials as 'trusted local sources' used to disseminate the Proponent's 'safety case.' Melgund residents need assurance that health impacts are being independently monitored, not just that officials are being used to manage public perception. This is an opportunity to establish a baseline for community health monitoring that is distinct from the Proponent's promotional activities and ensures objective oversight of community well-being.	Table 4.2 Roles and Engagement with Federal and Provincial Departments, Ministries and Agencies
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate emergency response self-sufficiency following engagement with the Ministry of Emergency Preparedness and Response.	The text notes engagement regarding 'emergency response measures' and seeking input from government. However, Melgund Township has no local fire, ambulance, or police services to provide input or support. The Proponent cannot rely on coordinating with non-existent local departments. The rationale for this task is to demand the Proponent provide 100% of the emergency capacity required for the project, as reliance on distant regional services (Ignace/Dryden) creates unacceptable response times and risk for the community.	Table 4.2 Roles and Engagement with Federal and Provincial Departments, Ministries and Agencies
Environment	Effects Assessment	Medium	Request the specific technical data regarding 'Great Lakes safety' that triggered US legislative opposition.	The text highlights that US lawmakers passed resolutions opposing the project specifically citing 'concerns over Great Lakes safety.' If downstream stakeholders have identified risks to the Great Lakes Basin sufficient to warrant legislative action, these risks originate at the site near Melgund. The Environment Working Group must review these specific concerns to ensure the protection of the local watershed and to validate whether these are valid technical gaps regarding water quality.	Table 4.2 Roles and Engagement with Federal and Provincial Departments, Ministries and Agencies
Human Environment (People)	Baseline	High	Address the safety implications of the admitted 'sporadic' engagement with Transport Canada due to 'capacity constraints'.	The Proponent's submission acknowledges that the primary federal regulator for transportation is unable to regularly engage due to capacity constraints. For Melgund, an unorganized territory traversed by the haul route (Highway 17) with zero local emergency services, this regulatory vacuum presents a critical safety risk. The Working Group must demand a plan to bridge this gap, ensuring that transportation safety planning is robust and does not rely on a regulator that is currently absent. This is an opportunity to establish strict local safety protocols in the absence of federal oversight.	Table 4.2 Roles and Engagement with Federal and Provincial Departments, Ministries and Agencies
Human Environment (People)	Baseline	High	Challenge the Proponent's classification of Melgund as an 'Inform' tier stakeholder and demand elevation to 'Involve' status regarding the 'infrastructure considerations' cited in Section 4.5.	The Proponent's submission explicitly limits direct collaboration on 'infrastructure considerations' to the Township of Ignace. Melgund Township (Dyment/Borups Corners) is an unorganized territory with zero local emergency services (no fire, ambulance, or police). Excluding Melgund from the 'Involve' tier means the specific risks associated with this total lack of capacity are not formally integrated into regulatory planning. The community has no local capacity; reliance on distant regional services creates unacceptable risk, and this gap cannot be addressed through passive 'Inform' level engagement. Elevating Melgund to the 'Involve' tier ensures that the unique infrastructure void in the unorganized territory is accurately reflected in the project's safety planning.	4.5 Plan for Future Public and Interested Parties Engagement
Environment	Baseline	High	Request the Proponent redefine the 'Involve' criteria to include Melgund in 'environmental considerations' planning, rather than limiting this scope solely to the Township of Ignace.	The IPD restricts input on 'environmental considerations' to the 'Involve' tier (Ignace). As the immediate physical neighbor to the Revell Site, Melgund shares the same watershed and airshed. Excluding Melgund from direct collaboration on environmental baselines and monitoring protocols ignores local knowledge of the specific unorganized territory's terrain and hydrology, potentially invalidating baseline data. Correcting this ensures that environmental monitoring covers the actual impact zone, not just the administrative boundaries of the host municipality.	4.5 Plan for Future Public and Interested Parties Engagement
Human Environment (People)	VCs	Medium	Contest the sufficiency of 'plain-language materials' for nearby communities and demand provision of raw technical data and independent review funding equal to the 'Involve' tier.	The text proposes 'plain-language materials' as the primary tool for the 'Inform' tier. For Melgund residents living adjacent to the site, simplified summaries are insufficient to assess specific risks to health, safety, and property value. The community requires the same level of technical detail and scrutiny capacity as the host municipality to ensure informed consent and safety verification. Providing raw data allows the Local Services Board to verify claims rather than relying on the Proponent's curated messaging.	4.5 Plan for Future Public and Interested Parties Engagement
Human Environment (People)	Baseline	High	Challenge the sufficiency of 'public information sources' for establishing a regional socio-economic baseline and require a specific data-gathering program for the unorganized territories of Dyment and Borups Corners.	The Proponent's submission relies on a review of public sources to conclude that no regional assessments exist. In unorganized territories like Melgund, formal 'public information' is often scarce or non-existent due to the lack of municipal reporting structures. Relying on this data vacuum creates a blind spot regarding the specific socio-economic and infrastructure realities of the immediate neighbors. The Proponent must be required to move beyond searching for existing reports and commit to generating primary data. This ensures the unique vulnerabilities of the unorganized population—who lack the institutional capacity of organized municipalities—are formally recognized and integrated into the project's social impact baseline.	5. Regional Assessment
Environment	Baseline	High	Request the Proponent define the specific geographic radius used to determine 'proximity' and mandate the creation of a project-specific Regional Environmental Baseline to fill the identified data gap.	The Proponent's submission explicitly states that no regional studies exist for the area, citing only the Ring of Fire assessment (534 km away) which is geologically and ecologically irrelevant to the Revell site. For Melgund Township, relying on the absence of government data is a critical risk; the community depends on the broader regional ecosystem (watersheds and wildlife corridors) that extends beyond the immediate project footprint. By demanding the Proponent generate new regional baseline data rather than simply noting its absence, the Working Group ensures that cumulative effects on the local environment surrounding Dyment and Borups Corners are accurately modeled and not underestimated due to a lack of historical data. This proactive approach establishes a robust foundation for future monitoring.	5. Regional Assessment
Environment	Effects Assessment	High	Request a quantitative definition of the "small amount" of on-site energy production and specific identification of the fuel sources and technologies intended for standby power generation.	The Proponent's submission relies on vague qualifiers to describe on-site power generation. For Melgund residents, the specific technology (e.g., diesel generators) directly impacts local air quality and noise levels. Defining the exact megawatt capacity and fuel type is necessary to establish a baseline for local atmospheric monitoring and to ensure the "best available technologies" claim is verifiable rather than aspirational. This clarification allows the community to assess the true environmental burden on the immediate airshed.	6. Strategic Assessment
Human Environment (People)	Alternatives	High	Challenge the Proponent to demonstrate full emergency response self-sufficiency for the proposed on-site standby power generation facilities and associated fuel storage.	The Proponent identifies a need for on-site energy production but does not address the safety implications of the required infrastructure. Since Melgund Township has zero local fire or emergency services, any reliance on distant regional hubs (Ignace/Dryden) to manage potential fires or failures at the power generation site creates an unacceptable safety gap. The Proponent must provide evidence that the project will provide 100% of the necessary emergency capacity to manage these specific industrial risks without depending on non-existent local resources.	6. Strategic Assessment
Human Environment (People)	Baseline	Medium	Request a localized socio-economic baseline that distinguishes Melgund Township's specific labor and business capacity from the broader 'Northwestern Ontario' region cited in the text.	The text promises 'long-term employment... in northwestern Ontario,' but this broad regional definition risks bypassing the immediate host community. Dyment and Borups Corners may face the infrastructure strain of the project without accessing the benefits if the Proponent relies on labor from larger regional centers. Establishing a specific local baseline is crucial to ensure economic promises translate into tangible opportunities for Melgund residents rather than just regional statistics.	B. PROJECT INFORMATION

Human Environment (People)	Effects Assessment	High	Challenge the Proponent's claim of 'protection of people' by demanding a detailed emergency response strategy that addresses the specific lack of local infrastructure in Melgund.	The Initial Project Description claims the project ensures the 'protection of people,' yet Melgund Township (Dyment/Borups Corners) is an unorganized territory with **ZERO** local emergency services (No Fire, No Ambulance, No Police). The processing and storage of 5.9 million used fuel bundles introduces high-consequence risks. Reliance on distant regional services (Ignace/Dryden) creates unacceptable response times and risk exposure. The Proponent must demonstrate 100% self-sufficiency in emergency response capacity to validate their safety claims, as the community has no capacity to assist.	B. PROJECT INFORMATION
Environment	Baseline	High	Request the specific geological baseline data and hydrogeological modeling used to substantiate the claim that the selected site is a 'stable geological formation' capable of isolating 5.9 million bundles.	The Proponent's core safety premise relies on the assertion of a 'stable geological formation.' As the host community, Melgund requires independent verification of the rock mechanics and hydrogeology specific to the Revell site to ensure that 'permanent containment' is scientifically valid and not merely a theoretical assumption derived from general regional geology.	B. PROJECT INFORMATION
Human Environment (People)	VCs	Medium	Require the inclusion of 'Intergenerational Community Burden' as a Valued Component to counter-balance the Proponent's claim of 'advancement of intergenerational equity.'	The text argues the project advances equity by removing the need for future generations to manage waste. However, for Melgund, this 'solution' creates a permanent, localized burden (stigma, land use restrictions) for future generations of residents. This discrepancy must be captured as a Valued Component to accurately assess the long-term social cost to the specific community hosting the waste, ensuring the 'equity' argument is not used to mask local disadvantages.	B. PROJECT INFORMATION
Human Environment (People)	Effects Assessment	High	Challenge the sufficiency of a 'conceptual' post-closure safety analysis and demand the inclusion of definitive 'bounding scenarios' for long-term containment failure within the initial Impact Statement.	The Proponent proposes utilizing a 'graded approach' where detailed post-closure design information is 'refined at later licensing stages' under the CNSC, rather than during the current Impact Assessment. For the residents of Melgund (Dyment/Borups Corners), who will live next to this waste permanently, deferring detailed safety analysis is unacceptable. A 'conceptual' analysis is insufficient to evaluate the long-term psychological and socio-economic impacts of potential containment failure. We must require the Proponent to model worst-case scenarios now, rather than waiting for future technical licensing phases. This ensures the community can provide informed consent based on the maximum possible risk, rather than a theoretical concept that will change after construction begins.	8. Related Provisions in the Physical Activities Regulations
Environment	Baseline	High	Request a detailed 'Site Characterization Environmental Management Plan' that quantifies the physical footprint (drilling, land clearing, water withdrawal) of activities the Proponent claims are exempt from IAA Section 7 prohibitions.	The Proponent's submission explicitly states that site characterization is 'not a designated activity' and is therefore not subject to the prohibitions in Section 7 of the Act. While this may be legally accurate, it presents a significant risk to the local environment in Melgund Township. Site characterization involves heavy machinery, deep drilling, and potential aquifer interaction. Because Melgund is an unorganized territory without municipal bylaws to regulate these activities, there is a danger that significant environmental disturbance could occur under the guise of 'data gathering' without the scrutiny of the Impact Assessment. We must demand transparency on these 'exempt' activities to ensure they do not degrade local land and water resources before the project is even approved. This ensures that the 'baseline' is not artificially altered by the characterization work itself.	8. Related Provisions in the Physical Activities Regulations
Human Environment (People)	Effects Assessment	Medium	Request a specific Socio-Economic Transition Plan for the 'Decommissioning and Closure' phases to be included in the IAA scope, despite the regulatory exclusion of these phases from the 'designated project' definition.	The text limits the IAA scope strictly to 'construction and operation,' relegating decommissioning and closure to the CNSC. While the CNSC manages technical safety, its mandate does not typically cover the socio-economic fallout of project closure (e.g., the 'bust' cycle after operations cease). Melgund Township needs assurance that the economic transition at the end of the project's life is planned for *now*. By excluding these phases from the IAA, the Proponent risks ignoring the long-term social stability of the region. We must demand that the IAA process captures the full lifecycle socio-economic impacts, ensuring that the community is not left without resources or a plan when the operational jobs disappear.	8. Related Provisions in the Physical Activities Regulations
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% onsite emergency response self-sufficiency regarding the proposed 'explosives storage' and 'surface facilities' (340 hectares).	The Proponent's submission identifies high-risk infrastructure, including 'explosives storage' and a massive industrial footprint, yet Melgund Township is an unorganized territory with zero local emergency services (no fire, ambulance, or police). Reliance on distant regional hubs like Ignace or Dryden creates unacceptable response times for industrial fires or explosions. This gap matters critically to the safety of nearby residents. The Proponent must provide a plan for full onsite emergency capacity to ensure that the community is not left vulnerable during the critical minutes following an accident. Adopting this recommendation ensures the project does not externalize safety risks onto a community with no capacity to respond.	9. Activities, Infrastructure, Structures and Physical Works
Environment	Baseline	High	Request a detailed water balance model and specific discharge locations for the 'water management systems' referenced in Section 9.1.	The text mentions 'water management systems' as required infrastructure but provides no data on water sourcing, usage rates, or effluent discharge points. For Melgund, which relies on local aquifers and surface water, this is a critical data gap. Establishing a strict baseline now allows the community to protect its water security. This recommendation forces the Proponent to be transparent about their hydrological footprint, ensuring that the 'multiple natural and engineered barriers' approach extends to protecting the local watershed from industrial runoff or depletion.	9. Activities, Infrastructure, Structures and Physical Works
Human Environment (People)	Triennial Reporting	Medium	Define the specific implications of 'institutional control' and the prohibition of mining on local economic development and land use rights post-closure.	The text notes that after closure, the site will transition to 'institutional control' which may include 'prohibiting mining in the area.' Melgund residents need to understand the exact geographic scope of these restrictions and how they might limit future local economic development or land use. Clarifying this now prevents future conflicts and ensures the community understands the long-term economic trade-offs of hosting the facility. This provides an advantage by establishing clear boundaries for future land use planning.	9. Activities, Infrastructure, Structures and Physical Works
Environment	Alternatives	Medium	Evaluate the design and containment alternatives for the surface 'low-level waste (LLW) and intermediate-level waste (ILW) storage facilities' to ensure zero-leakage performance.	The filing states that ILW, which contains long-lived radionuclides requiring isolation for hundreds of years, will be stored in surface facilities within the Protected Area. This creates a risk of soil and groundwater contamination distinct from the deep repository. The Environment Working Group must scrutinize these surface storage designs to ensure they are robust against local weather conditions and wear. This is an opportunity to demand higher safety margins for surface storage, preventing the site from becoming a source of localized contamination that could affect the surrounding land in Melgund.	9. Activities, Infrastructure, Structures and Physical Works
Human Environment (People)	Effects Assessment	High	Assess the emergency response protocols for the proposed 'rail spur' and 'onsite access roads,' specifically regarding derailment or hazardous material spills.	The introduction of a 'rail spur' for transporting materials and waste introduces significant accident risk to the immediate area. Since Melgund lacks local first responders, the community is vulnerable to prolonged exposure in the event of a derailment or spill while waiting for regional services. This task is essential to demand that the Proponent provides immediate, onsite containment and rescue capabilities for transportation accidents. This ensures that the safety of Melgund residents is not compromised by the logistical requirements of the project.	9. Activities, Infrastructure, Structures and Physical Works

Environment	Baseline	High	Request immediate identification of specific geographic coordinates for the 'receiving locations' of treated water discharge, rather than the current vague '2 to 10 km radius' description.	The Initial Project Description states that treated water discharge locations are 'still under evaluation' within a broad 2 to 10 km radius. For Melgund Township, this ambiguity is unacceptable as it prevents the establishment of a relevant environmental baseline. Without knowing the specific discharge points, the Environment Working Group cannot assess which local water bodies, aquifers, or private wells might be impacted by effluent. Identifying these locations now allows for the collection of accurate pre-project water quality data, ensuring that any future contamination can be properly attributed to the project. This transparency is essential for protecting the specific local ecosystem and water security of residents.	9. Activities, Infrastructure, Structures and Physical Works
Environment	Baseline	Medium	Require the immediate identification of the 'local water body or groundwater source' intended for fresh water supply, moving this from a 'future study' to a baseline requirement.	The Proponent plans to source fresh water locally but defers the identification of the source to future engagement. This delay prevents the Environment Working Group from assessing the current capacity of local aquifers or lakes to sustain such withdrawal without impacting local wells or ecosystem health. By requiring this identification now, the community can verify that the proposed source has sufficient volume to support both the project and existing local needs. This proactive approach prevents conflicts over water scarcity later in the project lifecycle and ensures the baseline data reflects the specific water body at risk.	9. Activities, Infrastructure, Structures and Physical Works
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% on-site emergency response self-sufficiency regarding the proposed 'Temporary fuel facility', 'Explosives Management Area', and 'fire water' distribution systems, explicitly excluding reliance on Melgund Township resources.	The Proponent's submission outlines high-risk infrastructure including fuel depots and explosives magazines but relies on standard regulatory compliance which often assumes local municipal support. It is critical to formally document that Melgund Township is an unorganized territory with zero local fire, ambulance, or police services. Reliance on distant regional hubs (Ignace/Dryden) for industrial fire or explosion response creates an unacceptable safety lag. By demanding the Proponent provide full self-sufficiency, the community ensures that the project does not introduce catastrophic risks that cannot be managed locally. This requirement forces the Proponent to internalize the cost of safety, ensuring the project is robust and does not burden the vulnerable, unserviced local context.	9. Activities, Infrastructure, Structures and Physical Works
Human Environment (People)	Effects Assessment	High	Require a Traffic Impact Assessment that specifically models accident response times from regional hubs (Ignace/Dryden) for the 'high traffic volumes and large vehicles' planned for the Highway 17 intersection.	The filing notes that access roads will connect to Highway 17 and accommodate large vehicles, yet it fails to account for the lack of local emergency services in Melgund. In the event of a collision involving heavy construction transport, the response time for ambulance or police is determined by the distance from regional centers, which can be significant. The Proponent must quantify this risk and propose mitigation measures (such as on-site paramedic staff or funded satellite emergency stations) to ensure that the increased probability of accidents does not result in unmanaged trauma risks for local residents and travelers. This ensures the project's logistics plan accounts for the reality of the local infrastructure deficit.	9. Activities, Infrastructure, Structures and Physical Works
Environment	VCs	Medium	Request a strict definition of the term 'where practicable' regarding the commitment to time clearing and grubbing activities outside of the bird nesting season (mid-May through mid-July).	The Proponent's submission uses the qualifier 'where practicable' regarding the avoidance of bird nesting seasons. In the context of regulatory oversight, this phrase often functions as a loophole allowing construction schedules to override environmental protection. The Environment Working Group must demand a clear set of criteria or a 'stop-work' protocol that defines exactly when economic practicability yields to ecological necessity. Strengthening this definition ensures that the protection of local terrestrial wildlife is a binding commitment rather than a discretionary option, thereby improving the project's environmental integrity and alignment with local stewardship values.	9. Activities, Infrastructure, Structures and Physical Works
Human Environment (People)	Effects Assessment	High	Request a detailed socio-economic impact analysis of the '800-bed worker accommodation camp' specifically focusing on the strain it will place on regional policing and health services utilized by Melgund residents.	The introduction of an 800-person camp in an area with a small population represents a massive demographic shift. While the text mentions on-site security and 'Fitness for Duty' protocols, it does not address the off-site impacts on the Ontario Provincial Police (OPP) and regional ambulance services that Melgund residents rely on. If these regional resources are diverted to handle incidents at the camp, the response availability for local residents diminishes. This recommendation seeks to ensure the Proponent contributes to expanding regional service capacity commensurate with the population influx, protecting the existing level of service for the community.	9. Activities, Infrastructure, Structures and Physical Works
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% self-sufficiency regarding the 'fire protection systems' and 'Emergency Response Building' proposed for the construction phase.	The Proponent's submission outlines internal fire detection and suppression systems but fails to acknowledge the regional reality: Melgund Township is an unorganized territory with ZERO local emergency services (No Fire, No Ambulance, No Police). Reliance on distant regional services from Ignace or Dryden creates an unacceptable risk profile for a high-hazard industrial construction site. The Proponent must prove they can manage a catastrophic failure without external support, as the community has no capacity to assist.	9.5 Construction
Environment	Baseline	High	Request precise coordinates and baseline ecological data for the 'receiving locations for treated water discharge' which are currently vaguely defined as being within a '2 to 10 km radius' of the site.	The Proponent's submission leaves the specific discharge points undefined within a massive 8km band. This ambiguity prevents the Environment Working Group from assessing which specific local water bodies, fish habitats, or aquifers will be impacted by construction dewatering and surface runoff. Melgund requires exact locations to ensure the baseline data reflects the actual receiving environment, not just a general regional average.	9.5 Construction
Human Environment (People)	Alternatives	Medium	Require a definitive decision and impact analysis regarding the 'rail spur' which is currently described as only 'being considered' rather than confirmed.	The Proponent's submission indicates that a rail spur is merely under consideration. If this infrastructure is not built, the transport of materials and used fuel will default to road transport, significantly increasing heavy truck volume on local highways. Melgund needs to understand the 'worst-case' traffic scenario (100% truck reliance) to evaluate the impact on road safety and infrastructure wear for local residents.	9.5 Construction
Human Environment (People)	Effects Assessment	High	Assess the safety protocols for 'mobile explosives loading trucks' accessing the 'explosives magazine' located away from the central service area.	The Proponent's submission notes that explosives magazines will be accessible to mobile trucks. Given that Melgund has no local police or emergency response capacity, the security and safety of explosives transport on or near the site is a critical vulnerability. The community needs assurance that these mobile hazards are managed with total self-sufficiency, as no local first responders exist to handle an accidental detonation or spill.	9.5 Construction
Environment	Effects Assessment	Medium	Request a specific impact assessment for the 'controlled drill and blast' excavation technique, focusing on the atmospheric discharge of blasting fumes via the 'exhaust ventilation shaft'.	The Proponent's submission confirms that ventilation from underground blasting will be discharged directly into the surface atmosphere. In the pristine rural context of Melgund, this introduces industrial contaminants (dust, nitrogen compounds) and noise. The Environment Working Group must ensure that the 'appropriate means to properly ventilate' do not simply transfer the hazard from the underground worker environment to the surface community environment.	9.5 Construction
Environment	Effects Assessment	High	Request a specific management and segregation plan for the ~3% of excavated rock that is not biotite granodiorite-tonalite, specifically addressing the 'trace proportions of sulphur-bearing minerals' identified in the text.	The Proponent's submission notes that while 97% of rock is benign, 'trace proportions of sulphur-bearing minerals' (sulphides) exist. In the context of Melgund's pristine water bodies, even small volumes of acid-generating rock in the Excavated Rock Management Area (ERMA) can cause significant leaching if not managed correctly. This recommendation is important to prevent Acid Rock Drainage (ARD) and ensure the protection of the local watershed and surface water quality.	9.5 Construction

Human Environment (People)	Effects Assessment	Medium	Request a safety impact assessment regarding the 'concurrent' use of 'controlled drill and blast' excavation while Used Fuel Containers (UFCs) are being emplaced in adjacent panels.	The Initial Project Description states that excavation and emplacement will occur simultaneously for 'safety and logistical reasons.' However, Melgund residents are concerned about the physical safety of the waste containers and the potential for accidents. The Proponent must demonstrate that blasting vibrations will not compromise the integrity of the 'bentonite' and 'concrete' seals or the UFCs. Validating these safety margins is an opportunity to improve community confidence in the project's operational safety.	9.5 Construction
Human Environment (People)	Effects Assessment	Medium	Define the maximum duration and specific safety protocols for the 'interim' storage of Low-Level Waste (LLW) and Intermediate-Level Waste (ILW) generated during operations.	The submission states LLW and ILW will be stored on-site on an 'interim basis'. Melgund residents are concerned this will become a permanent waste dump by default if no downstream solution exists. Establishing strict time limits and disposal paths for this secondary waste is crucial to define the project's long-term social footprint and ensure the community does not inherit an undefined liability.	9.5 Construction
Environment	Alternatives	Medium	Require detailed design specifications for the containment and treatment of liquid waste generated in the underground 'wash bay' and 'maintenance shop' to prevent groundwater contamination.	The text plans for an underground shop with a wash bay and welding shop. Without strict containment, industrial fluids (oils, solvents) could migrate into the surrounding rock or groundwater. This gap matters to Melgund as protecting the deep aquifer environment is critical. The expected result is a robust engineering design that guarantees zero discharge of industrial contaminants into the subsurface hydrogeology.	9.5 Construction
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% self-sufficiency for underground extraction, rescue, and major fire suppression, rather than relying on the 'refuge stations' and basic 'fire extinguishers' described.	Melgund Township (Dyment/Borups Corners) is an unorganized territory with ZERO local emergency services (No Fire, No Ambulance, No Police). The Proponent's submission details internal refuge stations but fails to address the external rescue capacity required for serious 'abnormal events' mentioned in the text. Reliance on distant regional services (Ignace/Dryden) creates unacceptable risk due to travel times. The Proponent must prove they do not rely on non-existent local capacity to ensure community safety is not compromised.	9.5 Construction
Environment	Effects Assessment	Medium	Quantify the projected air quality and particulate emissions from the on-site 'Manufacturing of cementitious and bentonite sealing materials' and 'Concrete batch plant'.	The text indicates that industrial manufacturing of sealing materials and concrete will occur directly on-site during operations. This introduces a new source of industrial dust and particulate matter not typically associated with simple storage. The Environment Working Group must ensure that these manufacturing activities do not degrade local air quality for nearby residents in Dyment, requiring strict dust management protocols to be defined in the Environmental Impact Statement.	9.6.2 List of Major Activities During Operations
Human Environment (People)	Alternatives	Medium	Assess the fire safety risks of the proposed 'battery powered vehicles' for underground use, specifically regarding thermal runaway suppression capabilities.	The Proponent proposes using battery-powered vehicles for all underground emplacement. While this benefits air quality, battery fires are notoriously difficult to extinguish and require specialized response. Given Melgund's lack of a local fire department, the Proponent must demonstrate that their underground safety systems can contain a battery fire independently. This is a critical safety validation to prevent an underground emergency from escalating while waiting for distant regional assistance.	9.6.2 List of Major Activities During Operations
Environment	Baseline	High	Request immediate identification of the 'suitable receiving waterbody' mentioned for contact water discharge and provision of baseline water quality data for that specific body.	The Initial Project Description states that contact water will be treated and discharged to a 'suitable receiving waterbody' but fails to identify it. For Melgund residents who rely on local surface water and aquifers for drinking and fishing, vague regulatory assurances are insufficient. Identifying the specific waterbody now allows for the establishment of a pre-project baseline, ensuring that any future degradation from 'active liquid waste' or 'cementitious' runoff can be accurately measured and attributed.	9.6.2 List of Major Activities During Operations
Human Environment (People)	Effects Assessment	High	Request a detailed safety analysis of 'concurrent' underground development and waste emplacement, focusing on vibration and accident risks.	The submission states that 'lateral development... would continue to occur in parallel with the packaging and emplacement activities.' This means blasting and excavation will happen alongside the handling of high-level nuclear waste. This dual-track operation increases the complexity of the safety case. The Working Group must demand a rigorous analysis of how construction accidents or vibrations could impact the integrity of waste emplacement operations, ensuring worker and community safety is not compromised by aggressive scheduling.	9.6.2 List of Major Activities During Operations
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% emergency response self-sufficiency for the listed 'fuel storage buildings', 'UFPP' hot cells, and 'active liquid waste' facilities.	The Proponent's submission lists high-risk infrastructure including fuel storage and hot cells where used fuel is exposed. Melgund Township is an unorganized territory with zero local emergency services (no fire, no ambulance). Reliance on regional hubs like Ignace or Dryden (45+ minutes away) creates an unacceptable safety gap for a facility of this complexity. The Proponent must prove they have full on-site capacity to manage fires, spills, and radiological containment without relying on non-existent local municipal resources. This ensures the community is not burdened with risks it cannot manage.	9.6.2 List of Major Activities During Operations
Human Environment (People)	Effects Assessment	Low	Assess the long-term socio-economic impacts of installing 'permanent markers' on local property values, land use, and community branding in Melgund Township.	The text mentions the installation of 'permanent markers to inform future generations' of the sealed repository. While necessary for safety, these markers effectively designate the area as a permanent hazard zone, which could stigmatize Dyment and Borups Corners. This recommendation is important to quantify the potential loss of property value and tourism potential. The expected result is the identification of mitigation strategies or compensation frameworks to offset the economic 'stigma effect' of hosting a permanently marked nuclear waste site, ensuring the community is not economically penalized for its role in national safety.	9.7.2 Listing of Major Activities for Decommissioning and Closure
Environment	Baseline	High	Request a specific baseline protocol for the 'surveys of soils and sediments' and 'ground water quality' monitoring mentioned, explicitly defining the Contaminants of Potential Concern (COPCs) related to decommissioning activities (e.g., concrete additives, demolition dust).	The text states that surveys will be conducted to identify COPCs and that groundwater quality will be monitored during the extended period. Since Melgund residents rely exclusively on private wells and local surface water, it is vital to establish exactly *what* will be monitored before activities begin. This recommendation matters because it prevents the Proponent from dismissing future contamination as 'natural variation.' The expected result is a robust, legally defensible baseline dataset that protects the community's water security and ensures accountability for any pollution generated during the decades-long decommissioning process.	9.7.2 Listing of Major Activities for Decommissioning and Closure
Environment	Alternatives	Medium	Request a technical assessment of the environmental implications of 'co-emplacement' of Low-Level Waste (LLW) underground versus off-site disposal, specifically focusing on potential chemical interactions with the host rock and groundwater.	The Proponent plans to emplace LLW generated during decommissioning underground, rather than removing it. This introduces a new waste stream (demolition debris, contaminated equipment) into the geological barrier that differs from the used fuel originally assessed. This matters to Melgund because the long-term safety of the local aquifer depends on the integrity of the repository. The expected solution is a comparative analysis proving that co-emplacement does not compromise the geological isolation of the site. This provides an opportunity to ensure that cost-saving measures (leaving waste on-site) do not increase environmental risk.	9.7.2 Listing of Major Activities for Decommissioning and Closure

Human Environment (People)	VCs	Medium	Require a formal definition and methodology for assessing 'society's desire' regarding the timeline for repository closure, ensuring Melgund Township's specific consent is weighted distinctly from broader regional or national sentiment.	The filing indicates that the duration of the 100-year monitoring phase will be determined based on 'society's desire at the time.' This vague terminology presents a governance risk to Melgund. Without a clear definition, the local community (Dyment/Borups Corners) risks being overruled by external political forces regarding when the site is closed. This recommendation is important to establish local agency over the project's lifecycle. The expected solution is a framework that grants the Local Services Board a defined role in this decision-making process, ensuring the community is not forced to host the facility longer than agreed upon due to external pressures.	9.7.2 Listing of Major Activities for Decommissioning and Closure
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% self-sufficiency for emergency response services (fire, ambulance, spill response) required for the 'construction of facilities' (e.g., concrete batch plant) and 'decommissioning of surface structures' described in the text.	The Proponent's submission outlines a 30-year decommissioning phase involving high-risk industrial activities, including the operation of a concrete batch plant, shaft liner removal, and demolition. Melgund Township (Dyment/Borups Corners) is an unorganized territory with zero local emergency services—no fire department, no ambulance, and no police force. Reliance on distant regional hubs (Ignace/Dryden) creates unacceptable response times for industrial accidents or chemical spills. This recommendation is critical to ensure the community is not exposed to unmanaged risks. The expected solution is a binding commitment from the Proponent to provide full on-site emergency capacity, ensuring that the safety of local residents is not compromised by the lack of municipal infrastructure.	9.7.2 Listing of Major Activities for Decommissioning and Closure
Human Environment (People)	Effects Assessment	Medium	Require the Proponent to define the technical and economic criteria for 'practicability' regarding the avoidance of traditional medicinal plants (Balsam fir/poplar) and wild rice.	The Initial Project Description identifies these species as culturally significant and valued for traditional medicine but qualifies their protection with the phrase 'to the extent practicable.' This creates a significant gap in accountability, as it provides no clear threshold for when engineering requirements will override the preservation of local botanical resources. For the residents and Indigenous users of the Melgund area, these plants represent a non-renewable cultural resource. Defining these terms will ensure that 'practicability' is not used as a loophole to avoid complex site layouts. The expected result is a transparent avoidance framework that prioritizes cultural heritage over minor cost savings.	19.2.3.8 VEGETATION, RIPARIAN AND WETLAND ENVIRONMENTS
Human Environment (People)	Effects Assessment	High	Demand the Proponent demonstrate 100% self-sufficiency for fire and medical response during the site clearing and blasting phases identified in the pathways of change.	The Proponent's submission confirms that site clearing, blasting, and construction of components will occur, all of which carry inherent risks of forest fires and industrial accidents. Melgund Township is an unorganized territory with zero local fire, police, or ambulance services. Reliance on distant regional hubs like Ignace or Dryden creates an unacceptable risk profile, as response times would be insufficient for life-safety or rapid fire suppression. The community has no local capacity; reliance on distant regional services creates unacceptable risk. The Proponent must provide 100% of emergency capacity on-site to ensure that project-related incidents do not overwhelm the limited resources of neighboring municipalities.	19.2.3.8 VEGETATION, RIPARIAN AND WETLAND ENVIRONMENTS
Environment	Effects Assessment	High	Challenge the characterization of residual effects on wetlands as 'negligible' and demand a site-specific 'No Net Loss' plan for the 17% of the site identified as swamp and fen.	The Proponent's submission justifies local wetland destruction by citing regional abundance in Northern Ontario, claiming that wetland loss has not reached 'critical levels' in the region. This approach ignores the specific ecological functions of the site-specific wetlands in Melgund. There is a logical contradiction in the Initial Project Description where the likelihood of effect is rated as 'high' (due to certain clearing) but the degree is 'negligible.' For the Melgund area, these wetlands are critical for local drainage and biodiversity. The expected result is a formal commitment to compensatory mitigation that ensures local ecological integrity is maintained, rather than relying on broad regional statistics to dismiss local loss. This is an opportunity for the Proponent to align with modern 'No Net Loss' standards.	19.2.3.8 VEGETATION, RIPARIAN AND WETLAND ENVIRONMENTS
Environment	Baseline	High	Request a quantitative inventory of habitat loss, specified in hectares, for each of the 64 upland breeding bird species and eight SAR species identified in the Proponent's submission.	The Initial Project Description identifies a high diversity of bird species but lacks a specific accounting of the physical area to be disturbed. For Melgund Township, where the natural environment is a primary community asset, the claim that residual effects will be 'negligible' cannot be verified without knowing the exact scale of habitat removal. Providing this data is an opportunity for the Proponent to move beyond qualitative assumptions and provide a scientifically defensible baseline. This will allow the community to better understand the physical footprint of the project and ensure that mitigation measures are proportional to the actual loss of land.	19.2.3.9 MIGRATORY AND SPECIES AT RISK BIRDS
Human Environment (People)	Effects Assessment	High	Demand the Proponent demonstrate 100% self-sufficiency in emergency response capacity for accidents related to blasting, site clearing, and construction activities mentioned in the filing.	The Proponent's submission lists high-risk activities such as blasting and heavy construction but fails to address the critical lack of local emergency infrastructure. Melgund Township is an unorganized territory with zero local fire, police, or ambulance services. Reliance on distant regional hubs in Ignace or Dryden for accidents or fires resulting from project activities creates an unacceptable risk. The Proponent must provide 100% of the necessary emergency capacity on-site. This recommendation ensures that the project does not strain distant regional resources and protects the safety of both workers and the local community, which currently has no local capacity to respond to industrial incidents.	19.2.3.9 MIGRATORY AND SPECIES AT RISK BIRDS
Environment	Effects Assessment	Medium	Require the Proponent to define specific ecological thresholds for noise, vibration, and light emissions rather than using the radiological 'ALARA' standard cited in the Initial Project Description.	The filing's use of 'As Low As Reasonably Achievable' (ALARA) for sensory disturbances is ambiguous in an ecological context. For sensitive species like the Eastern Whip-poor-will or the Common Nighthawk, specific decibel and lumen thresholds are required to prevent displacement. By establishing clear, measurable standards, the Proponent can improve the success of the project by providing a transparent framework for monitoring. This will allow for immediate adaptive management if thresholds are exceeded, ensuring that the 'low risk' prediction for migratory birds is actually maintained over the project's multi-decade lifespan.	19.2.3.9 MIGRATORY AND SPECIES AT RISK BIRDS
Human Environment (People)	VCs	Medium	Request documentation on how Indigenous Traditional Knowledge (ITK) was integrated into the identification of bird species of concern and the assessment of pathways of change for traditional land use.	The Initial Project Description acknowledges that bird displacement may affect the traditional use of lands and resources but does not demonstrate how local or traditional knowledge informed these conclusions. Integrating ITK into the Valued Component (VC) selection process is an opportunity to identify species of high cultural or social significance that may not be captured by federal or provincial SAR lists alone. This approach improves the project's social license and ensures that the assessment reflects the holistic values of the region, leading to more effective and culturally appropriate mitigation strategies.	19.2.3.9 MIGRATORY AND SPECIES AT RISK BIRDS
Environment	Effects Assessment	High	Challenge the Proponent's claim that residual effects on terrestrial wildlife will be 'negligible' despite a 'moderate likelihood' of sensory disturbance, and request the specific quantitative thresholds used to define 'ALARA' for noise and light emissions affecting the five endangered bat species and moose.	The Proponent's submission relies on the ALARA principle for non-radiological stressors like noise and light, which lacks a clear regulatory definition in this context. For the residents of Melgund, who live in an unorganized territory with a high reliance on the local environment for subsistence and recreation, vague mitigation commitments are insufficient. This recommendation is important because it forces the Proponent to move beyond procedural assumptions and provide empirical data. By defining clear, measurable indicators, the Proponent has an opportunity to improve the project's transparency and scientific rigor. The expected result is a more robust protection plan for local moose populations and endangered bats, ensuring that sensory disturbances do not lead to long-term displacement or population decline in the township's vicinity.	19.2.3.10 TERRESTRIAL WILDLIFE AND WILDLIFE HABITAT

Human Environment (People)	Effects Assessment	High	Demand the Proponent demonstrate 100% self-sufficiency for emergency response related to wildlife-vehicle interactions on project-access roads, given the predicted displacement of wildlife due to sensory disturbances.	The Proponent's submission acknowledges that sensory disturbances are likely to occur and will affect wildlife distribution. This displacement increases the risk of moose-vehicle collisions on local roads. Melgund Township (Dyment/ Borups Corners) is an unorganized territory with zero local emergency services (No Fire, No Ambulance, No Police). Community has no local capacity; reliance on distant regional services from Ignace or Dryden creates unacceptable risk. This recommendation is vital to community safety, as it shifts the burden of emergency response entirely to the Proponent. The expected solution is a dedicated on-site emergency response team capable of handling road accidents, which improves the project's safety profile and protects local residents from increased response times during emergencies.	19.2.3.10 TERRESTRIAL WILDLIFE AND WILDLIFE HABITAT
Environment	Baseline	Medium	Request a regional habitat connectivity and fragmentation analysis that includes wide-ranging carnivores such as the wolverine and cougar, rather than dismissing them based on current density or distance from the project site.	The Initial Project Description dismisses the presence of wolverines and cougars based on a 80km distance or low density, but it fails to analyze the project site's role as a potential migratory corridor. Melgund is situated within a contiguous Boreal forest ecosystem where habitat fragmentation can have cascading effects. This recommendation is critical to the community as it ensures the baseline data reflects the true ecological connectivity of the region. Providing this analysis presents an advantage to the project by demonstrating a comprehensive understanding of regional biodiversity. The expected result is a baseline study that accounts for the movement of apex predators, which is essential for maintaining the ecological integrity of the unorganized territory.	19.2.3.10 TERRESTRIAL WILDLIFE AND WILDLIFE HABITAT
Human Environment (People)	Triennial Reporting	Medium	Require the Proponent to establish a formal funding mechanism to augment regional mental health and addiction services, moving beyond internal Employee Assistance Programs (EAP).	The Proponent's submission explicitly admits that 'limited substance abuse and addiction services are available in local communities' and that increased disposable income may exacerbate these issues. Despite this, the filing relies on internal corporate 'Code of Conduct' and 'Employee Assistance Programs' as primary mitigations. These internal tools do not address the broader community-level impacts or the strain on regional infrastructure. Since Melgund residents have no local access to these services, the Proponent must commit to capacity-building for regional providers to justify the claim that social impacts will be 'negligible.' This presents an opportunity to improve the project's social license by leaving a positive legacy of enhanced regional health infrastructure.	19.2.3.11 NON-INDIGENOUS HEALTH CONDITIONS
Human Environment (People)	Effects Assessment	High	Demand the Proponent provide a comprehensive plan for 100% on-site emergency medical, fire, and mental health crisis response capacity for the project site and accommodation camp.	The Proponent's submission identifies potential risks related to substance abuse, domestic violence, and mental health associated with the workforce and accommodation camp. However, Melgund Township is an unorganized territory with zero local emergency services (no fire, no ambulance, no police). The Proponent's reliance on distant regional hubs in Ignace or Dryden for emergency response creates an unacceptable risk to both the project workforce and the existing community. The Proponent must demonstrate total self-sufficiency in emergency response to ensure that project-related incidents do not deplete the already limited regional resources that Melgund relies upon. This requirement ensures the project does not externalize its safety risks onto a vulnerable, unorganized community.	19.2.3.11 NON-INDIGENOUS HEALTH CONDITIONS
Environment	Effects Assessment	High	Request the Proponent provide localized, site-specific modeling for air quality, noise, and vibration impacts that accounts for the near-zero baseline of the Melgund unorganized territory.	The Proponent's submission acknowledges that project activities such as blasting, site clearing, and construction have the potential for a 'moderate to high degree of adverse effects' on biophysical determinants of health. However, the filing concludes that residual effects will be 'negligible' based on standard industry practices. For the residents of Melgund, who live in a low-density, quiet environment, the transition from a near-zero baseline to industrial-scale noise and air emissions is significant. The Proponent must demonstrate how 'negligible' risk is calculated for this specific local context rather than relying on regional averages. This is an opportunity for the Proponent to improve the transparency of their risk matrix and provide the community with a realistic expectation of environmental changes.	19.2.3.11 NON-INDIGENOUS HEALTH CONDITIONS
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% self-sufficiency for emergency response and physical safety services for all Project phases, including the worker accommodation camp and transportation corridors.	The Proponent's submission assumes that social impacts and waste management can be handled through 'coordination with local authorities.' However, Melgund Township is an unorganized territory with zero local fire, police, or ambulance services. The Initial Project Description fails to account for the fact that there is no local capacity to coordinate with. Relying on distant regional hubs like Ignace or Dryden for emergency response to accidents, spills, or social disturbances at the worker camp creates an unacceptable risk profile for local residents. This task is an opportunity for the Proponent to improve the project by committing to a fully self-contained emergency response infrastructure that does not drain the already stretched resources of neighboring municipalities or leave Melgund residents vulnerable. The expected result is a comprehensive Emergency Services Plan that guarantees zero reliance on non-existent local volunteer or municipal services.	19.2.3.12 NON-INDIGENOUS ECONOMIC CONDITIONS
Environment	Baseline	High	Require the completion and disclosure of quantitative groundwater and surface water modeling for the Melgund watershed before finalizing the scope of the Impact Statement.	The Proponent's submission characterizes risks to hydrogeology and surface water quality as 'low' based on preliminary, non-quantitative screening data. For the residents of Melgund, who rely entirely on private wells and local water bodies, 'preliminary' confidence is insufficient. The filing admits that quantitative modeling is incomplete, yet it uses these early conclusions to justify excluding certain components from further assessment. Providing this data now is an opportunity to build community trust and ensure that the Impact Statement is targeted at the actual risks to the local water supply. The expected result is a baseline established on empirical evidence rather than optimistic projections.	19.2.3.12 NON-INDIGENOUS ECONOMIC CONDITIONS
Human Environment (People)	Triennial Reporting	Medium	Request the establishment of an annual socio-economic monitoring and reporting framework for Melgund, rather than the three-year cycle mandated by the NFWA.	The Proponent's submission relies on the Nuclear Fuel Waste Act's (NFWA) three-year reporting cycle as a primary mechanism for oversight. In a small, unorganized community like Melgund, social and economic shifts—such as sudden increases in service demand or changes in community cohesion—can occur and escalate much faster than a triennial cycle can capture. Annual reporting provides a more responsive 'early warning system' for the Local Services Board. This recommendation allows the Proponent to demonstrate a commitment to proactive adaptive management. The expected result is a more agile mitigation strategy that can address social stressors before they become entrenched problems.	19.2.3.12 NON-INDIGENOUS ECONOMIC CONDITIONS
Human Environment (People)	VCs	High	Demand a formal risk screening for 'Non-Indigenous Economic Conditions' that specifically evaluates the adverse effects of local price inflation, housing displacement, and regional economic disparity.	The Proponent's submission pre-emptively categorized economic impacts as exclusively positive, thereby bypassing a formal risk screening. This is a significant gap for Melgund, as the community does not benefit from the 'Hosting Agreement' mentioned in the filing, which is specific to the Township of Ignace. Without the financial protections of such an agreement, Melgund residents are uniquely vulnerable to the 'boom-bust' cycle, including increased costs for goods and potential displacement due to housing market inflation. By requiring this assessment, the Proponent can identify necessary mitigation measures for unorganized territories that lack municipal tax-base protections. This will improve the project's success by ensuring that 'positive' economic changes do not inadvertently marginalize the existing local population.	19.2.3.12 NON-INDIGENOUS ECONOMIC CONDITIONS

Human Environment (People)	Effects Assessment	Medium	Request a site-specific Social Management Plan for the worker accommodation camp that includes dedicated security and traffic enforcement protocols for the Highway 17 and 603 corridors.	The Proponent's submission suggests that social effects from the worker camp will be negligible due to its status as a 'dry facility' and the use of 'best management practices.' However, the filing does not address how these policies will be enforced in an area with no local police presence. Any social friction or traffic incidents involving camp residents or contractors will directly impact Melgund's safety and way of life. A dedicated management plan that includes Proponent-funded security and traffic monitoring would mitigate the risk of 'off-site' impacts in unorganized territories. This improves the project by providing the community with the security oversight that the provincial and local governments currently do not provide in this area.	19.2.3.12 NON-INDIGENOUS ECONOMIC CONDITIONS
Environment	Effects Assessment	High	Challenge the Proponent's reliance on linear distance (140 km to the US border and 210 km to the Manitoba border) as a primary metric for environmental safety and demand a pathway-based impact assessment.	The Proponent's submission assumes that administrative boundaries and physical distance are sufficient barriers to environmental change. For Melgund, which sits within the same regional watershed and atmospheric corridor, this logic is insufficient. We require the Proponent to demonstrate impact modeling based on hydrogeological connectivity and atmospheric transport pathways rather than arbitrary map lines. This is an opportunity for the Proponent to move beyond legalistic jurisdictional arguments and provide a scientifically rigorous assessment that protects local water and air quality. The expected result is a more robust safety case that accounts for actual ecological movement, providing the community with greater certainty regarding long-term environmental integrity.	20. Potential Changes to the Environment on Federal Lands or Lands Outside Ontario
Human Environment (People)	VCs	Medium	Request the expansion of the 'Human Environment' scope to include socio-economic risk perception and traditional land use that extends beyond formal 'Reserve' boundaries.	The Initial Project Description narrowly defines impacts on people based on proximity to federal or provincial borders and formal land status. This ignores the reality of how Melgund residents and Indigenous partners use the land for traditional purposes, recreation, and economic activity which often transcends these administrative boundaries. By dismissing distal impacts, the Proponent risks ignoring the 'stigma effect' which can harm local tourism and property values in unorganized territories like Melgund. We expect the Proponent to include 'Socio-Economic Risk Perception' as a Valued Component (VC). This will improve the project by addressing community anxiety and ensuring that the assessment reflects the actual lived experience and economic dependencies of the region.	20. Potential Changes to the Environment on Federal Lands or Lands Outside Ontario
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% self-sufficiency in emergency response and security capacity, given the lack of local services in Melgund.	The Proponent's submission identifies that the project will result in adverse changes to land access for safety and security purposes. Melgund Township (Dyment/Borups Corners) is an unorganized territory with zero local fire, police, or ambulance services. Reliance on distant regional hubs in Ignace or Dryden for site-related emergencies or security incidents creates an unacceptable risk to both the project and the surrounding community. The Proponent must demonstrate 100% self-sufficiency in emergency response capacity to ensure that local safety is not compromised by the project's operational requirements. This is an opportunity for the Proponent to improve the project's safety profile by providing dedicated on-site resources that do not drain the limited regional capacity.	21. Potential Effects on Anishinaabe People of Wabigoon Lake Ojibway Nation and Other Indigenous Groups Identified in Section 3
Human Environment (People)	VCs	High	Demand the inclusion of 'Perception of Risk' as a formal Valued Component (VC) within the Human Health and Environmental Risk Assessment (HHERA).	The Initial Project Description acknowledges that 'perceptions of risk associated with radioactive materials' may influence traditional practices and social conditions. For the residents of Melgund, who live in an area without formal social development or health support structures, these psychological and social impacts are significant. By including 'Perception of Risk' as a formal Valued Component, the Proponent can develop targeted mitigation and communication strategies that address the social determinants of health. This approach moves beyond technical dose assessments to address the social reality of risk perception, which is essential for maintaining community well-being and social cohesion in an unorganized territory.	21. Potential Effects on Anishinaabe People of Wabigoon Lake Ojibway Nation and Other Indigenous Groups Identified in Section 3
Environment	Baseline	High	Validate that baseline data for groundwater, surface water, and terrestrial wildlife includes the specific watersheds and migration corridors used by harvesters in the Melgund area.	The filing identifies that land access will be restricted for safety and security, potentially impacting traditional and current land use. Because Melgund residents and Indigenous land users share these ecosystems, the environmental baseline must capture the specific local conditions of the Dyment/Borups Corners area. Ensuring that the baseline data is granular enough to include local watersheds and wildlife habitats will allow for a more accurate assessment of how restricted access or environmental changes will impact the 'Current use of lands and resources' cited in the Initial Project Description. This improves the project by ensuring mitigation strategies are based on accurate, local environmental data.	21. Potential Effects on Anishinaabe People of Wabigoon Lake Ojibway Nation and Other Indigenous Groups Identified in Section 3
Human Environment (People)	VCs	Medium	Request a non-confidential summary of economic benefit categories and regional infrastructure commitments that extend to unincorporated areas like Melgund.	The Proponent's submission claims positive economic impacts based on a confidential Hosting Agreement with the host First Nation. As a neighboring unorganized territory, Melgund requires transparency on how regional infrastructure improvements, employment, and training opportunities will be distributed. Without evidence of how these benefits reach unincorporated areas, the claim of 'positive' socio-economic impact remains unsubstantiated for the broader local area. Providing this summary would improve the transparency of the project and allow the community to better understand the potential for local economic development and improved regional infrastructure.	21. Potential Effects on Anishinaabe People of Wabigoon Lake Ojibway Nation and Other Indigenous Groups Identified in Section 3
Human Environment (People)	Effects Assessment	High	Demand the Proponent demonstrate 100% self-sufficiency for fire and emergency response capacity specifically for the high-volume propane and natural gas storage and combustion infrastructure identified in the filing.	The Proponent's submission identifies massive reliance on fossil fuel combustion for heating, which necessitates significant on-site fuel storage and high-temperature operations. Melgund Township (Dyment/Borups Corners) is an unorganized territory with zero local fire or emergency services. Reliance on distant regional services from Ignace or Dryden to respond to a fire, explosion, or spill at the heating plant creates an unacceptable risk to the surrounding area. The community has no local capacity; reliance on distant regional services creates unacceptable risk. The Proponent must provide 100% of the emergency response capacity on-site. This recommendation ensures that the project does not place an undue burden on distant municipal services and guarantees that any industrial accidents are managed internally without threatening the safety of local residents.	22. Estimate of Greenhouse Gas Emissions
Human Environment (People)	Baseline	Medium	Request the Proponent expand the scope of transportation safety and emission assessments to include the Highway 17 corridor through Melgund, rather than only the access roads 'after turn off from Highway 17'.	The Initial Project Description artificially limits the scope of transport impacts to the site access roads. For the residents of Dyment and Borups Corners, the primary safety and environmental concerns begin on Highway 17, where used nuclear fuel and construction materials will transit through the heart of the community. By excluding the Highway 17 segment from the local assessment, the Proponent is ignoring the baseline conditions and potential risks to local residents who share this corridor. Expanding this scope will provide a more transparent view of the project's impact on local transportation safety and air quality. This is an opportunity to improve the project's social license by acknowledging that the 'local' impact does not begin at the site gate, but at the community's doorstep.	22. Estimate of Greenhouse Gas Emissions

Environment	Alternatives	High	Request a detailed feasibility study and comparative analysis of low-carbon heating alternatives (such as industrial heat pumps or geothermal systems) to replace the proposed propane and natural gas heating plants.	The Proponent's submission indicates that heating plants account for a staggering 88 to 95 percent of the project's total greenhouse gas emissions during construction and operations. In the context of Melgund Township, which is an unorganized territory, the introduction of large-scale fossil fuel combustion infrastructure presents a long-term environmental footprint that contradicts the project's stated low-carbon objectives. By challenging the Proponent to adopt best available technologies like geothermal or heat pumps, the community can ensure the project minimizes local air quality impacts and carbon intensity. This is an opportunity for the Proponent to demonstrate a genuine commitment to net-zero goals rather than relying on conventional fossil fuel systems. The expected result is a significant reduction in the project's primary emission source, improving the overall environmental performance of the facility within the township.	22. Estimate of Greenhouse Gas Emissions
Human Environment (People)	Effects Assessment	High	Require the Proponent to demonstrate how the Environmental Management System (EMS) will achieve 100% self-sufficiency in emergency response for environmental accidents or spills, without reliance on external municipal services.	The Initial Project Description discusses 'corrective measures' for 'unforeseen adverse effects' but fails to account for the total lack of local emergency services in Melgund Township. As an unorganized territory with zero local fire, ambulance, or police capacity, any reliance on distant regional hubs like Ignace or Dryden for response to a spill or industrial accident creates an unacceptable safety gap. The Proponent must provide 100% of the emergency capacity on-site. This is an opportunity for the Proponent to improve the project's safety profile by establishing a dedicated, full-time emergency response team. The expected result is a project that does not drain distant regional resources and provides immediate, on-site protection for the community, ensuring that 'mitigation measures' are actually deployable in real-time.	24. Environmental Management System
Environment	Effects Assessment	High	Demand a detailed technical specification of the 'best available technology' for groundwater and effluent monitoring, specifically addressing how these systems will protect private well-water users in the unorganized territory of Melgund.	The Proponent's submission relies on broad CSA standards (N288.7, N288.5) but lacks site-specific rigor for an area with no municipal water infrastructure. Melgund residents are entirely dependent on groundwater. The 'adaptive management' approach mentioned in the filing is insufficient if it allows for a 'learn-as-you-go' model regarding water contamination. The expected solution is a commitment to real-time, redundant monitoring systems that provide immediate alerts to local residents. This improves the project by building technical trust and ensuring that the 'unforeseen effects' mentioned in the filing do not result in the permanent loss of the community's only water source. Adopting this recommendation ensures that the environmental protection program is not just a regulatory exercise but a functional safeguard for local life-sustaining resources.	24. Environmental Management System
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% self-sufficiency in emergency response (Fire, Medical, Security) for the project site and transportation routes within Melgund Township.	The Initial Project Description mentions 'safety and security purposes' and 'improved services,' but fails to account for the unique status of Melgund as an unorganized territory with zero local emergency capacity. Currently, there are no fire, police, or ambulance services based in Dyment or Borups Corners. Relying on distant regional hubs like Ignace or Dryden creates an unacceptable risk profile for both the project and the local community. The Proponent must provide 100% of the emergency capacity required for the project to ensure no additional burden is placed on already strained regional services. This is an opportunity for the Proponent to improve the project's safety case by establishing a dedicated, onsite response team that can provide mutual aid to the unorganized territory, thereby improving the overall safety of the region.	25. Overall Conclusions and Path Forward
Human Environment (People)	Baseline	Medium	Require the Proponent to provide specific, quantified targets for 'improved infrastructure and services' within the unorganized territory of Melgund, rather than regional generalizations.	The filing promises 'improved infrastructure and services' as a lasting benefit, yet Melgund lacks the municipal structure to easily capture these benefits compared to incorporated towns like Ignace. Without specific baseline commitments for the Dyment/Borups Corners area, there is a high risk that infrastructure investments will be concentrated in larger hubs, leaving the most proximate unorganized communities with the impacts but none of the improvements. This recommendation seeks to secure tangible benefits such as road upgrades or telecommunications improvements that are directly accessible to Melgund residents, ensuring a more equitable distribution of project advantages.	25. Overall Conclusions and Path Forward
Human Environment (People)	VCs	Medium	Request the inclusion of 'Stigma and Perceived Risk' as a specific Valued Component (VC) with a defined methodology for measuring socio-economic impacts on unorganized territories.	The Proponent's submission characterizes changes in land use as being driven by 'perceptions of potential radioactive contamination.' By framing these concerns as subjective perceptions rather than objective socio-economic drivers, the filing risks dismissing the very real economic impacts on property values and community well-being in Melgund. Identifying this as a formal VC will allow for a rigorous assessment of how the project's presence affects the desirability of the area. The expected result is a more transparent mitigation strategy that addresses the economic reality of stigma, ensuring that residents of unorganized territories are not unfairly disadvantaged by the project's reputation.	25. Overall Conclusions and Path Forward
Environment	Effects Assessment	High	Demand a detailed Land Use and Access Management Plan that specifies the geographic extent of exclusion zones and the duration of restricted access to Crown lands in the Melgund area.	The Initial Project Description acknowledges 'unavoidable changes to land use and access' but provides no granular detail on how these restrictions will impact the residents of Dyment and Borups Corners. In an unorganized territory, access to the surrounding environment for recreation and traditional activities is a primary component of the local lifestyle. The Proponent's claim that residual effects will be 'negligible' cannot be verified without a clear map of restricted areas. Providing this detail early will allow the community to assess the true impact on their quality of life and enable the Proponent to design access corridors that minimize disruption, thereby improving local acceptance of the project.	25. Overall Conclusions and Path Forward
Human Environment (People)	Effects Assessment	High	Demand a detailed Social Management Plan that actions MMIWG Call for Justice 13 by providing 100% of the required emergency and security capacity for the project site and surrounding unincorporated areas.	The Proponent's submission commits to actioning MMIWG Call for Justice 13 but lacks specific implementation mechanisms. Melgund Township is an unorganized territory with zero local police, fire, or ambulance services. Any increase in workforce or industrial activity without 100% Proponent-funded emergency self-sufficiency creates an unacceptable risk. Reliance on distant regional hubs in Ignace or Dryden is not a viable mitigation strategy for the safety of Indigenous women, girls, and local residents. This is an opportunity for the Proponent to demonstrate true responsibility by ensuring that the project does not place an impossible burden on non-existent local services, thereby improving the overall safety profile of the DGR.	Acknowledgement of Truths from the Initial Project Description (IPD) Consolidated Engagement Report: Public and Interested Parties (Appendix)
Human Environment (People)	Baseline	High	Address the admitted data deficiencies regarding the characterization of populations in unincorporated communities by conducting primary socio-economic and cultural baseline studies in Melgund/Dyment.	The Proponent's submission explicitly states that the Initial Project Description does not fully represent the characteristics of populations in unincorporated communities. Without this baseline data, the impact on Melgund's social fabric and its non-existent service infrastructure cannot be measured. This is an opportunity for the Proponent to improve the accuracy of the Impact Statement and ensure that the 'informed' part of consent is based on complete data. Accurate characterization of these communities is essential to identify specific vulnerabilities that arise from being in an unorganized territory with no local governance or emergency response capacity.	Acknowledgement of Truths from the Initial Project Description (IPD) Consolidated Engagement Report: Public and Interested Parties (Appendix)

Environment	VCs	Medium	Validate that impacts on traditional land and resource use will be assessed as physical and biological changes to the environment, rather than being limited to 'perceived risks' or 'changes in access'.	The Proponent's submission frames impacts on land and water primarily as 'perceived risks' or 'access' issues. For the residents of Melgund and surrounding traditional territories, the protection of groundwater and terrestrial wildlife is a physical necessity, not just a matter of perception. Treating these as social perceptions risks excluding them from rigorous technical mitigation and monitoring. The Proponent must demonstrate how ecological integrity will be maintained to ensure the long-term safety of the local environment. By elevating these to physical Valued Components, the Proponent can provide the technical assurance required to build trust with local land users.	Acknowledgement of Truths from the Initial Project Description (IPD) Consolidated Engagement Report: Public and Interested Parties (Appendix)
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% self-sufficiency for emergency response (Fire, Medical, and Security) for the Project site and associated transportation corridors, rather than relying on regional hubs.	The Proponent's submission notes engagement with 'health' and 'volunteer organizations,' yet it fails to address the critical reality that Melgund Township is an unorganized territory with zero local emergency services. There is no local fire department, ambulance base, or police station. Relying on distant regional services in Ignace or Dryden for emergency response to a nuclear project site or a transportation accident creates an unacceptable risk profile for Melgund residents. This is an opportunity for the Proponent to improve the project by committing to a self-contained emergency response model. The expected result is a project design that does not place an undue burden on distant, already-strained regional services while ensuring the safety of the local unorganized community.	Introduction, Purpose and Engagement Tools: Initial Project Description (IPD) Consolidated Engagement Report (Appendix)
Human Environment (People)	Baseline	Medium	Request a specific accessibility audit of engagement methodologies for residents of unorganized territories, focusing on the digital divide and the physical distance to hubs like Ignace and Dryden.	The Initial Project Description highlights a significant discrepancy between 2.2 million digital impressions and only 89 actual participants. For residents in Melgund (Dyment/Borups Corners), a heavy reliance on digital tools like Zoom and Mentimeter, or the requirement to travel to Ignace or Dryden for workshops, represents a significant barrier to participation. To ensure the 'Human Environment' baseline accurately reflects local concerns, the Proponent must demonstrate how they are reaching residents who may lack high-speed internet or the ability to travel long distances for short sessions. Improving this outreach will ensure that the social license for the project is based on a truly representative sample of the regional population, including those in unorganized areas.	Introduction, Purpose and Engagement Tools: Initial Project Description (IPD) Consolidated Engagement Report (Appendix)
Environment	Baseline	Medium	Demand the integration of local land-use and hydrological knowledge into the baseline studies for the waterways and geography identified in the Proponent's site maps.	The Proponent's submission mentions displaying poster boards of 'waterways and roads' and providing a 'Water Statement.' However, high-level corporate statements are insufficient for capturing the granular local knowledge of seasonal flooding, specific fish habitats, or groundwater behavior unique to the Melgund area. By incorporating local observations into the baseline, the Proponent can improve the accuracy of their environmental modeling. This presents an advantage to the project's success by identifying potential environmental risks early that may be missed by standard technical surveys. The expected result is a more robust environmental baseline that reflects the lived experience of those closest to the proposed site.	Introduction, Purpose and Engagement Tools: Initial Project Description (IPD) Consolidated Engagement Report (Appendix)
Human Environment (People)	Effects Assessment	Medium	Request a formal socio-economic impact study specifically for 'Unorganized Township Property Owners' in Melgund to address potential inequities in the 'Host' vs 'Other' community framework.	The Proponent's submission establishes a hierarchy by distinguishing 'Host Communities' with signed agreements from 'Other Communities' and 'Unorganized Township Property Owners.' Residents in Melgund lack a municipal government to negotiate the same protections or benefits afforded to 'Host' towns. This creates a risk of economic marginalization, particularly regarding property values and social cohesion. The Proponent must provide a transparent mechanism for how the concerns of these unorganized residents are weighted in the effects assessment. Ensuring these voices are not siloed will improve the project's social license and provide a more accurate picture of regional socio-economic health.	5. Identification of Public and Interested Parties: Initial Project Description (IPD) Consolidated Engagement Report (Appendix)
Environment	Baseline	Medium	Require the integration of local ecological knowledge from Melgund-based 'Tourist Outfitters' into the baseline data for terrestrial wildlife and fish habitats.	The Initial Project Description identifies tourist outfitters as interested parties with stakes in land and resource use. In unorganized territories like Melgund, these outfitters and residents possess long-term, multi-generational observational data on local water quality and wildlife patterns that formal scientific snapshots may miss. By mandating the inclusion of this local knowledge in the baseline phase, the Proponent can improve the accuracy of environmental impact predictions. This approach also validates the expertise of the local community, turning a potential point of conflict into a collaborative opportunity to ensure the protection of the regional tourism economy.	5. Identification of Public and Interested Parties: Initial Project Description (IPD) Consolidated Engagement Report (Appendix)
Human Environment (People)	VCs	High	Demand the Proponent clarify the 'municipal-level services' referenced for the Melgund Local Service Board and explicitly acknowledge the total absence of local emergency response capacity in the baseline safety assessment.	The Proponent's submission identifies Local Service Boards (LSBs) as entities providing municipal-level services. However, in the specific case of Melgund, there is zero local capacity for fire, police, or ambulance services. By categorizing Melgund as an 'Other Community' rather than a 'Host,' the Initial Project Description risks overlooking the critical safety gap inherent in unorganized territories. The Proponent must be challenged to demonstrate 100% self-sufficiency for emergency response, as reliance on distant regional hubs like Dryden or Ignace creates an unacceptable risk for residents. Addressing this early in the Valued Components (VCs) selection ensures that 'Community Safety' is measured by actual response times rather than administrative categories.	5. Identification of Public and Interested Parties: Initial Project Description (IPD) Consolidated Engagement Report (Appendix)
Human Environment (People)	Baseline	High	Request a comprehensive baseline assessment of Dyment Road and adjacent routes, evaluating their current condition and capacity to handle heavy project traffic without compromising resident safety.	The Proponent's submission notes anticipated impacts to road access, including Dyment Road and the deterioration of existing routes. As a primary access point for Melgund residents, the safety and integrity of this road are paramount. Because the community lacks local emergency services, any traffic-related incident on these roads faces significantly delayed response times from distant hubs. The Proponent should use this as an opportunity to commit to infrastructure upgrades that account for both project needs and resident safety. This will improve the success of the project by reducing the likelihood of accidents and ensuring the community remains connected and safe.	6. Summary of Issues and Areas of Interest: Initial Project Description (IPD) Consolidated Engagement Report (Appendix)
Environment	Baseline	High	Demand a detailed geochemical analysis of excavated rock and a comprehensive baseline study of the local watershed, specifically focusing on Lake Malagon and the potential for acid rock leachate.	The Initial Project Description identifies potential risks of acid rock leachate and watershed contamination. Given the proximity of the project to Lake Malagon and the reliance of Melgund residents on the surrounding watershed for various uses, a rigorous geochemical baseline is required. This recommendation ensures that any future changes in water quality can be accurately attributed and mitigated. By conducting this study early, the Proponent can improve project design to prevent leachate, thereby protecting the local environment and maintaining community trust. The expected result is a robust environmental monitoring framework that protects local water security.	6. Summary of Issues and Areas of Interest: Initial Project Description (IPD) Consolidated Engagement Report (Appendix)

Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% self-sufficiency for emergency response (Fire, EMS, and Police) for the project site and associated traffic incidents on Highway 17 and Dyment Road.	The Proponent's submission acknowledges concerns regarding impacts on medical and emergency services and the strain on existing systems. For the Melgund community, which is an unorganized territory with zero local fire, police, or ambulance services, this represents a critical safety gap rather than a mere 'strain.' Reliance on distant regional hubs like Ignace or Dryden for response to accidents creates an unacceptable risk profile for residents. The Proponent must provide 100% of the emergency capacity required for the project to avoid further burdening regional services. This is an opportunity for the Proponent to improve the project's safety framework by ensuring that the repository does not degrade the existing (and already absent) safety infrastructure of the local community.	6. Summary of Issues and Areas of Interest: Initial Project Description (IPD) Consolidated Engagement Report (Appendix)
Environment	VCs	Medium	Require the Proponent to define the specific waste inventory as a Valued Component (VC) and provide a definitive policy statement on the permanent vs. temporary status of intermediate-level waste.	The filing highlights community uncertainty regarding whether intermediate-level waste will remain permanently at the site. The environmental risk profile and long-term monitoring requirements of the repository change significantly if intermediate-level waste is included in the permanent inventory. For the Melgund community, clarity on the 'source term' is essential for assessing long-term environmental safety and land use. This is an opportunity for the Proponent to provide transparency and address a major source of community concern, leading to a more accurate and accepted environmental impact statement.	6. Summary of Issues and Areas of Interest: Initial Project Description (IPD) Consolidated Engagement Report (Appendix)
Environment	Effects Assessment	High	Challenge the Proponent to provide a site-specific Forest Fire Mitigation and Response Plan that demonstrates zero reliance on local municipal fire services.	The Initial Project Description acknowledges the increasing risk of forest fires due to climate change. In the unorganized territory of Melgund, there is no local fire department to respond to such events. The Proponent must therefore develop a response plan that is entirely self-contained and does not draw on the limited resources of distant municipalities like Ignace or Dryden. This ensures that a fire at the project site or in the immediate vicinity does not leave the Melgund community vulnerable. A self-sufficient fire response plan is a necessary component of the project's safety infrastructure and represents an advantage in protecting both the project's assets and the surrounding natural environment.	6. Summary of Issues and Areas of Interest: Initial Project Description (IPD) Consolidated Engagement Report (Appendix)
Human Environment (People)	VCs	High	Require the Proponent to include 'Emergency Response Self-Sufficiency' as a specific Valued Component (VC) in the upcoming IPD and engagement materials, specifically addressing the zero-capacity reality of Melgund.	The Proponent's submission discusses sharing 'potential impacts' and 'project details' during future engagement. For the residents of Dyment and Borups Corners, the most critical impact is the risk of accidents or spills in a zone with zero local fire, police, or ambulance services. The community has no local capacity; reliance on distant regional services in Ignace or Dryden creates an unacceptable risk. By establishing self-sufficiency as a VC, the Proponent is challenged to demonstrate how they will provide 100% of emergency capacity for the project. This is an opportunity to improve the project's safety profile and ensure that the 'potential impacts' discussed in workshops are grounded in the reality of Melgund's unorganized status.	7. Next Steps: Future Public Engagement Activities: Initial Project Description (IPD) Consolidated Engagement Report (Appendix)
Human Environment (People)	Effects Assessment	Medium	Request a 'Feedback Integration Framework' that specifically tracks and reports on how concerns from unorganized territories are weighted and addressed in the project design.	The Proponent's submission claims feedback will 'inform decision-making,' but there is a significant risk that Melgund's unique needs—such as the total absence of local emergency services and infrastructure—will be overshadowed by the concerns of larger, organized municipalities. A transparent audit trail is required to ensure that the specific safety and social risks of the Dyment/Borups Corners area are not lost in a top-down communication style. Adopting this recommendation will provide the community with a clear mechanism to see the direct impact of their contributions, moving the process from passive information sharing to accountable participation and ensuring the project design reflects the unique constraints of unorganized territories.	7. Next Steps: Future Public Engagement Activities: Initial Project Description (IPD) Consolidated Engagement Report (Appendix)
Human Environment (People)	Baseline	High	Demand a localized engagement strategy that accounts for Melgund's lack of municipal infrastructure and provides independent technical support for residents to interpret 'Technical Workshops' and 'Baseline Studies'.	The Proponent's submission mentions hosting 'Technical Workshops' and sharing 'baseline studies,' yet Melgund is an unorganized territory without a town hall, local staff, or a municipal framework to help residents process complex nuclear data. Without local experts or a formal government structure, residents cannot meaningfully participate in the 'open dialogue' the Proponent claims to foster. This is an opportunity for the Proponent to improve the project's social license by funding independent peer reviews specifically for the Local Services Board. This would ensure the community is not disadvantaged by its lack of formal government and that the results of the engagement are based on an informed public, leading to a more robust and defensible Impact Statement.	7. Next Steps: Future Public Engagement Activities: Initial Project Description (IPD) Consolidated Engagement Report (Appendix)
Environment	Baseline	High	Request the detailed list of parameters for 'Baseline Data Collection' (Section 2 of the Proponent's submission) to ensure local groundwater and soil conditions in the Melgund area are specifically monitored.	The Proponent's submission identifies baseline data as a key theme but lacks the specific metrics for the Melgund region. As an unorganized territory, Melgund lacks municipal environmental oversight, making the Proponent's data the primary record for future comparisons. Ensuring the inclusion of local knowledge regarding specific water tables and soil types in the Dyment area will improve the accuracy of the Impact Statement and provide a baseline that reflects the unique geography of the township. This is an opportunity for the Proponent to build trust by showing that local environmental nuances are not being overlooked in favor of regional generalizations, resulting in a more robust and defensible environmental assessment.	General
Human Environment (People)	Effects Assessment	High	Demand the Proponent demonstrate 100% emergency response self-sufficiency within the 'Mitigation, Protection and Enhancement' commitments (Section 4 of the Proponent's submission).	The Proponent's submission includes protection measures but fails to account for the fact that Melgund Township has zero local emergency services (No Fire, No Ambulance, No Police). Community has no local capacity; reliance on distant regional services from Ignace or Dryden creates unacceptable risk. The Proponent must provide full on-site capacity to ensure that any project-related incidents do not overwhelm or depend upon distant, already-strained regional resources. This is an opportunity to enhance project safety and provide a tangible benefit to the surrounding unorganized area. The expected result is a self-contained emergency response model that protects both the project and the local residents without increasing the burden on neighboring municipalities.	General
Human Environment (People)	VCs	Medium	Request the specific criteria and standards for the 'Reconciliation and Engagement' commitments (Section 6 of the Proponent's submission) as they apply to residents of unorganized territories.	The Proponent's submission lists reconciliation and engagement as a thematic category but does not define the framework for communities without municipal structures. In Melgund, the lack of a local government means residents require a specialized engagement model to ensure their well-being and safety concerns are weighted fairly against technical priorities. Defining these standards early will prevent community distrust and ensure that the project's social license is built on transparent, enforceable commitments rather than vague aspirational statements. This approach will improve the project's social sustainability by creating a clear pathway for unorganized residents to influence project outcomes and monitor the Proponent's accountability over time.	General

Environment	Baseline	High	Request the Proponent provide an objective geochemical characterization protocol for excavated rock that removes the pre-determined language of 'confirming' non-toxicity as stated in Section 14.3 of the Initial Project Description.	The Proponent's submission assumes the non-acid generating and non-toxic nature of the repository horizon rock before testing is complete. For the residents of Melgund, who rely on the integrity of the local watershed and groundwater, this confirmation bias is a significant concern. An objective assessment is required to ensure that any potential for acid rock drainage or metal leaching is identified early. By adopting a truly exploratory scientific approach, the Proponent can improve the credibility of the baseline data and ensure that mitigation strategies for rock piles are based on evidence rather than assumptions, ultimately protecting the local environment and community health.	Section 2: Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)
Human Environment (People)	Baseline	High	Challenge the Proponent to demonstrate 100% emergency response self-sufficiency for the project site and surrounding township, addressing the critical gap in fire, police, and ambulance services identified in the infrastructure planning section of the filing.	The Proponent's submission notes plans to update infrastructure and services baselines, but it must account for the fact that Melgund is an unorganized territory with zero local emergency services. Currently, the community has no local capacity and relies on distant regional services from Ignace or Dryden, which creates an unacceptable risk profile for a project of this magnitude. The Proponent must provide 100% of the required emergency capacity. This is a vital opportunity for the Proponent to improve project safety by funding or establishing dedicated on-site response teams that can also support the surrounding township, thereby reducing the burden on distant regional hubs and improving overall community safety.	Section 2: Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)
Human Environment (People)	Baseline	Medium	Request a detailed methodology for how the Proponent will bridge the socio-economic data gap between 2023 and the availability of the 2026 Census data mentioned in Section 15 of the Initial Project Description.	The filing relies heavily on the 2026 Census to update population and demographic data. However, Melgund is a small, unorganized community where even minor shifts in housing, employment, or temporary residency during the pre-construction phase can have immediate and disproportionate impacts. Waiting for 2026 data may result in an outdated baseline that fails to capture real-time socio-economic shifts. The Proponent should utilize interim local data and community-led surveys to ensure the baseline reflects current realities. This proactive approach will allow for more accurate impact predictions and better-targeted social investments in the township.	Section 2: Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)
Environment	Baseline	Medium	Demand the establishment of clear, predefined triggers and thresholds for what constitutes 'as warranted' regarding additional studies for terrestrial wildlife, carnivores, and invertebrates mentioned in Section 14.10 of the filing.	The Initial Project Description uses vague qualifiers like 'as warranted' and 'appropriate survey methods,' which grants the Proponent excessive discretion in determining the scope of biodiversity studies. Melgund Township is situated in a sensitive ecological zone where local knowledge suggests specific wildlife patterns not always captured in high-level surveys. Defining these triggers in advance ensures transparency and prevents the under-sampling of critical species. This is an opportunity for the Proponent to integrate local ecological observations into the study design, leading to a more robust and defensible environmental baseline.	Section 2: Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)
Human Environment (People)	Effects Assessment	High	Demand the Proponent provide a comprehensive Emergency Response Plan for transportation incidents occurring within Melgund Township, specifically addressing the 'fire and impact' resistance claims of the certified packages.	The Proponent's submission highlights the robustness of transportation packages against fire and impact, yet Melgund Township is an unorganized territory with zero local fire, police, or ambulance services. Relying on distant regional hubs like Ignace or Dryden for a specialized nuclear or battery-related fire creates an unacceptable risk profile. The Proponent must demonstrate 100% self-sufficiency in emergency response capacity for any incident on local transit corridors, as the community has no capacity to assist. This is an opportunity for the Proponent to fund and establish dedicated emergency standby units that could improve regional safety and ensure the project does not burden distant, already-stretched municipal services. The expected result is a legally binding commitment to onsite and transit-corridor emergency response teams provided entirely by the Proponent.	Section 3. Environmental Design Features: Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)
Human Environment (People)	Alternatives	High	Challenge the Proponent to demonstrate the fire suppression self-sufficiency for the proposed 'battery-powered underground mobile fleet' and associated charging infrastructure.	While the Proponent's filing suggests battery-powered fleets improve air quality and worker safety, these systems introduce unique fire risks, such as thermal runaway, which require specialized suppression techniques. Because Melgund has zero local fire services, any fire involving this 'environmental design feature' would be unmanageable by the community and would require response times from Dryden or Ignace that are likely too slow to prevent a catastrophe. The Proponent must prove they will provide 100% of the specialized firefighting capacity required for this technology. This is an opportunity to ensure that the 'green' choice of batteries does not create a new, unmitigated safety hazard for the region. The expected result is a detailed fire safety engineering study specific to the battery fleet that assumes zero assistance from local volunteer or municipal departments.	Section 3. Environmental Design Features: Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)
Environment	Baseline	Medium	Request the specific criteria and baseline data used to define 'environmentally sensitive features' (wetlands and watercourses) that the centralized site layout claims to avoid.	The Initial Project Description claims the site layout was designed to avoid sensitive areas, but it lacks the underlying data to verify these claims against local knowledge of the Melgund watershed. In an unorganized territory, the integrity of local water bodies is paramount for both environmental health and the residents who rely on private wells or surface water. Providing this data allows the community to validate the 'avoidance' strategy and ensures that 'regulatory standards' for discharge are calibrated to the actual sensitivity of the local receiving environment. This transparency will improve the project's credibility and ensure that the 'compact footprint' does not inadvertently impact unmapped but locally significant hydrological features. The expected result is a collaborative mapping exercise that includes local land-use data.	Section 3. Environmental Design Features: Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)
Environment	Effects Assessment	Medium	Request a precise geographic definition of 'surrounding lands' regarding the prohibition of recreational hunting and fishing by non-local staff and detail the enforcement mechanism.	The Initial Project Description commits to prohibiting non-local employees from hunting or fishing in 'surrounding lands' to protect local resources. However, without a clear map and an enforcement strategy that does not rely on non-existent local authorities, this commitment is unenforceable. For the residents of Melgund, local fish and wildlife are vital for food security and recreation. The Proponent must clarify how they will monitor off-duty staff in an unorganized territory. A clear enforcement plan would improve the project by preventing the depletion of local resources and reducing potential conflicts between project staff and local residents.	4. Mitigation, Protection and Enhancement Measure Commitments: Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)
Environment	Baseline	High	Demand the establishment of a comprehensive groundwater and surface water baseline that includes private well testing in the Melgund area.	The Proponent's submission discusses monitoring 'treated effluent' and 'groundwater inflows' but uses vague qualifiers like 'to the extent practical.' In Melgund, residents in this unorganized territory rely exclusively on private wells and local surface water for their needs. Any impact on water quality is a direct threat to the community's viability. This task requires the Proponent to move beyond generic monitoring and provide specific, measurable thresholds based on local data. Establishing this baseline now provides an opportunity to protect the community's primary water source and ensures that any future deviations are caught early, improving the long-term environmental results of the project.	4. Mitigation, Protection and Enhancement Measure Commitments: Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)

Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% self-sufficiency for emergency response and medical services for all Project phases.	The Proponent's submission mentions implementing a 'Conventional Health and Safety Program' and 'communicating transportation plans,' but it fails to account for the unique regulatory and safety vacuum in Melgund Township. As an unorganized territory, Melgund has zero local fire, police, or ambulance services. The Initial Project Description's reliance on regional hubs like Ignace or Dryden for emergency support is insufficient, as response times from these distant locations create an unacceptable risk to both project personnel and local residents. By demanding the Proponent provide 100% of its own emergency capacity, the community ensures that the project does not further strain already stretched regional resources. This is an opportunity for the Proponent to improve the project's safety profile by establishing an on-site, full-service emergency response hub that could potentially offer mutual aid, thereby improving the overall safety results for the surrounding unorganized areas.	4. Mitigation, Protection and Enhancement Measure Commitments: Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)
Human Environment (People)	VCs	High	Request a detailed transportation safety and enforcement plan that specifically addresses traffic management in unorganized territories lacking local police.	The filing commits to enforcing speed limits and reporting wildlife collisions, yet it does not address how these rules will be enforced on public corridors passing through Melgund. Without a local police force, there is no mechanism to ensure project-related traffic adheres to safety protocols outside the immediate project site. This recommendation is critical to the community to prevent increased accident rates on shared roads. The expected solution is a Proponent-funded or managed traffic monitoring system that ensures compliance without relying on distant OPP detachments. Adopting this would improve project success by reducing liability and fostering trust with local residents who rely on these roads for daily transit.	4. Mitigation, Protection and Enhancement Measure Commitments: Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)
Environment	Effects Assessment	Medium	Challenge the Proponent to define specific environmental triggers and immediate mitigation protocols for 'road wash-out' events that could isolate the site or the community.	In Table 5-1 of the Proponent's submission, monitoring of culverts and roadside ditches is proposed to limit the risk of road wash-outs. In the context of Melgund, a road wash-out is not merely a sediment control issue; it is a critical infrastructure failure that would sever access for emergency responders from distant regional hubs. The community has no local capacity to manage such events. By demanding specific triggers and a commitment to 100% self-sufficient repair capacity, the Working Group ensures that environmental failures do not become human safety catastrophes. This recommendation provides an advantage to the project by ensuring that the Proponent's 'adaptive management' approach includes hard engineering solutions for maintaining access, which is vital for the long-term viability of the site in a remote, unorganized township.	5. Monitoring Commitments- Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)
Human Environment (People)	Alternatives	High	Request a technical evaluation of the proposed Highway 17 intersection designs to ensure they prioritize unimpeded access for regional emergency vehicles traveling from Dryden and Ignace.	The Initial Project Description mentions ongoing discussions with the Ministry of Transportation regarding connection options at Highway 17. For the residents of Melgund, this highway is the only artery for life-saving services. Any project-related traffic congestion or poorly designed intersections could delay emergency response times from distant hubs, which is a life-safety issue given the lack of local services. This task is an opportunity for the Proponent to improve the project by integrating 'emergency priority' into their infrastructure design. The expected result is a transportation plan that guarantees project activities will not degrade the already precarious emergency access for the unorganized territory, thereby aligning the project's physical footprint with its stated commitment to community well-being.	5. Monitoring Commitments- Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)
Human Environment (People)	Baseline	High	Demand the Proponent provide a comprehensive Emergency Services Self-Sufficiency Plan that accounts for the total absence of local fire, police, and ambulance services in Melgund Township.	The Proponent's submission references the 'safety of the system' and 'social determinants of health' as key commitments, yet it fails to acknowledge that Melgund Township is an unorganized territory with zero local emergency capacity. Relying on distant regional hubs like Ignace or Dryden for emergency response creates an unacceptable risk profile for both project personnel and local residents. This recommendation is critical because it forces the Proponent to move beyond vague safety commitments and demonstrate how they will provide 100% of the required emergency capacity internally. By addressing this gap early, the Proponent can improve project safety margins and reduce the potential burden on overstretched regional services, ultimately fostering greater community trust and ensuring that a local incident does not escalate due to delayed response times from distant municipalities.	5. Monitoring Commitments- Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)
Environment	VCs	Medium	Require the Proponent to provide a conceptual framework for the 70-year extended monitoring period, specifically identifying the thermal and radiological indicators that will be tracked post-operation.	The Proponent's submission defers the scope of the 70-year extended monitoring program until the end of the Operations phase. For a community like Melgund, which lacks a permanent municipal government to oversee long-term corporate commitments, this deferral creates significant uncertainty regarding intergenerational safety. Establishing these Valued Components (VCs) now allows the community to understand what 'safety' looks like in the long term. This is an opportunity for the Proponent to substantiate their 'high level of confidence' in the repository's performance with concrete, measurable parameters. The expected result is a more robust baseline that includes long-term environmental stability indicators, providing the community with the transparency required to evaluate the project's legacy.	5. Monitoring Commitments- Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)
Environment	Effects Assessment	High	Request a comprehensive lifecycle greenhouse gas (GHG) assessment that includes Scope 3 emissions, specifically focusing on the transportation of nuclear waste and the carbon footprint of construction materials.	The Proponent's submission characterizes the project's climate impact as 'negligible' by focusing primarily on Scope 1 and 2 emissions. However, for the residents of Melgund and the surrounding unorganized territories, the localized impact of heavy transport and large-scale construction is a primary concern. By omitting Scope 3 emissions, the Initial Project Description likely underestimates the total carbon footprint. Requiring a full lifecycle analysis ensures that the 'negligible' claim is validated against the total environmental burden, providing a more transparent baseline for the Environment Working Group to assess long-term atmospheric impacts. This transparency is an opportunity for the proponent to build trust by acknowledging the full scale of the project's footprint.	7. Climate Change Commitments - Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)
Environment	Alternatives	High	Demand a detailed technical evaluation of low-carbon alternatives for the proposed heating plant, such as geothermal or industrial-scale electric heat pumps, to replace high-emission fuel sources.	The Proponent's submission reveals that the heating plant is the overwhelming driver of emissions, contributing up to 95% of the total during operations. In the pristine environment of the Melgund area, the introduction of a major point-source emitter is a significant change to local air quality. This task forces the proponent to move beyond the vague commitment of 'best available technologies' and demonstrate a concrete shift toward electrification or renewables. Adopting zero-emission heating technologies would significantly improve the project's environmental profile and align with the community's expectation for minimal industrial disturbance.	7. Climate Change Commitments - Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)

Environment	Baseline	Medium	Require the development and implementation of the Greenhouse Gas Management Plan (GHGMP) prior to the start of site preparation and construction, rather than 'prior to operation'.	The Proponent's submission indicates that annual emissions during the construction phase (14,480 tonnes CO2e) are actually higher than during the operations phase (10,834 tonnes CO2e). Despite this, the filing suggests delaying the formal GHGMP until operations. For Melgund, the construction phase represents the most intense period of local environmental disruption. Moving the GHGMP forward ensures that mitigation strategies for the heating plant and heavy machinery are in place when emissions are at their peak. This proactive approach allows the community to monitor environmental performance from day one, ensuring that the highest-impact phase of the project is not left without a formal management framework.	7. Climate Change Commitments - Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)
Human Environment (People)	Effects Assessment	High	Challenge the Proponent to demonstrate 100% self-sufficiency in fire suppression and emergency response capacity for the proposed heating plant and associated industrial infrastructure.	The Proponent's submission identifies a large-scale heating plant as the core industrial component of the facility. Such infrastructure introduces specific fire and industrial accident risks to the township. Melgund is an unorganized territory with zero local fire, police, or ambulance services. Reliance on distant regional hubs in Ignace or Dryden for an emergency at a high-output heating plant creates an unacceptable safety risk for the local population and the environment. The proponent must be mandated to provide 100% of the emergency response capacity on-site. This is an opportunity for the proponent to enhance local safety by ensuring that their industrial footprint does not strain non-existent local resources or distant regional services.	7. Climate Change Commitments - Commitments Made in the Initial Project Description Appendix (APM-REP-05000-0217-R000)