

Comments on the Integrated Project Description (IPD) for the Proposed Deep Geological Repository (DGR)

On behalf of *Protect Our Waterways*—a registered nonprofit organization dedicated to education, awareness, and monitoring of the Nuclear Waste Management Organization's (NWMO) Adaptive Phase Management process within our community—we are submitting the following comments regarding the Initial Project Description (IPD) for the proposed Deep Geological Repository (DGR). Our membership consists of concerned residents from South Bruce.

We believe that the NWMO's proposed Deep Geological Repository must be designated for a **full federal Impact Assessment** and associated **public hearing**.

Transportation must be included in the Impact Assessment

Transportation of nuclear waste is a critical component of this project. Given that transportation routes may pass through multiple communities, including South Bruce, and considering our proximity to the Bruce Power generating station, transportation impacts must be fully analyzed as part of the assessment. This includes safety, emergency response capacity, environmental risk, and long-term community impacts.

Assessment of alternatives is required

A comprehensive examination of **alternatives to the project**, as well as **alternative means of carrying out the project**, must be incorporated into the Impact Assessment. This is a core requirement of meaningful environmental evaluation and informed public decision-making.

The Initial Project Description is insufficient

We are concerned that the IPD does not provide the level of detail necessary to support informed analysis or public understanding. A more robust and transparent project description is needed before any determination on next steps can be made.

The summary states repeatedly that part of the purpose is to make sure future generations aren't saddled with the cost and responsibility of managing the waste in the future. However, after 160 years, the NWMO will abandon the waste, and the remaining million years of responsibility will rest with future generations. If the repository fails in year 161, there is no money or organization to clean it up. It will fall to future generations entirely.

Why a Full Impact Assessment Is Required

Given the deficiencies and gaps in the IPD, we request that the Impact Assessment Agency of Canada initiate a **full Impact Assessment**, which would:

- Evaluate the project as an *integrated system*, including transportation
- Assess timing, scope, and a full range of alternatives
- Address cumulative, intergenerational, and cross-jurisdictional impacts
- Provide a transparent, evidence-based forum for both public and expert participation in determining whether, and under what conditions, the project should proceed

We submit these comments in the interest of ensuring a thorough, transparent, and scientifically rigorous review process that reflects the concerns and values of the communities potentially affected.

The Executive Committee

Protect Our Waterways-No Nuclear Waste

South Bruce, Ontario
