



Coalition for Responsible Energy Development in New Brunswick
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Comment to the IAAC: Conduct a full Impact Assessment of the proposed Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project, and include transportation of radioactive waste in the assessment

By email: nuclearwaste-dechetsnucleaires@iaac-aeic.gc.ca

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To the members of the Impact Assessment Agency of Canada:

Introduction to CRED-NB

The Coalition for Responsible Energy Development in New Brunswick (CRED-NB), a volunteer community-based organization formed in May 2020, provides education to the public and advocates for responsible energy development to address the climate crisis. CRED-NB represents more than 20 citizen groups and businesses and more than 150 individuals across New Brunswick, listed on our website: <https://crednb.ca/about/>

Background:

The Nuclear Waste Management Organization (NWMO), which includes NB Power, is proposing a nuclear waste transportation and burial scheme that will span 50 years of transportation, 160 years of operations and a million years of radioactive risk. The NWMO's own [documentation](#) states that transportation is an integral part of this plan, yet it is pushing to have it excluded from the federal Impact Assessment.

For New Brunswick, this means that for 10 to 15 years, [2,100 packages](#) of highly radioactive waste nuclear fuel, among the most toxic substances on Earth, would be trucked 2,900 kilometers, largely over [two-lane public roads and highways](#) which experience the most fatal collisions, from the Point Lepreau Nuclear Generating Station to a Deep Geological Repository located in the headwaters of the Wabigoon River near Ignace in northwest Ontario. If transportation is excluded from the Impact Assessment, there will be no evaluation of its cumulative risks to the biosphere, human health, public safety, and future generations.

The public, especially those living on the transportation route, must fully understand these cumulative effects, risks and impacts now and into the far future.

CRED-NB's Asks:

CRED-NB calls upon the Impact Assessment Agency of Canada (IAAC) to conduct a full Impact Assessment and public hearing of the proposed Deep Geological Repository (DGR).

CRED-NB insists that that transportation of the radioactive wastes be included in the Impact Assessment.

CRED-NB's concerns about the risks of transporting radioactive wastes, including high-level nuclear fuel waste, from nuclear facilities to the proposed DGR:



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- We are concerned about the potential for accidents and spills resulting in contamination of land and waterways near homes and within communities located on the transportation route.
 - The frequency of trucking accidents on roads in [New Brunswick](#), [Quebec](#) and [Ontario](#), means that it's likely not a matter of if there's an accident involving radioactive waste, but when. In 2024, [86 percent](#) of fatal collisions involving transport trucks in Ontario were caused by the risky behaviour of drivers of non-commercial vehicles, such as cars. Trucks hauling radioactive wastes would be exposed to these risks.
 - Highway 11-17 from Thunder Bay to Ignace is the route that transport trucks carrying radioactive will take to the DGR. This highway experienced [four collisions](#) involving tractor trailers, one resulting in a fatality, on January 27, 28 and 29, 2026. While this spike is unusual, the number of collisions involving transport trucks rises in the winter. Radioactive waste trucks would also face a higher risk of accident during the winter.
- Indigenous rights and consent must be respected as recognized by the United Nations Declaration on the Rights of Indigenous Peoples ([UNDRIP](#)) and required under Canadian law.
- The transportation and disposal of radioactive waste on Indigenous homelands is rejected in the Resolution by the [Wolastoq Grand Council](#) (New Brunswick), the [Joint Declaration](#) between the Anishinabek Nation and the Iroquois Caucus on the Transport and Abandonment of Radioactive Waste (Ontario and Quebec), and the Resolution of the [Chiefs of Ontario](#).
- Transportation must be included in the Impact Assessment to prevent the possibility of [secretly moving radioactive waste](#) in the future. Recently, all the waste nuclear fuel from the Gentilly-1 reactor in Quebec, and low- and intermediate-level radioactive wastes from the Whiteshell W-1 reactor in Manitoba, were transported to Canadian Nuclear Laboratories at Chalk River without notifying Parliament, obtaining consent from First Nation, or informing communities along the transportation routes. Evaluating the merits and risks of transporting radioactive wastes by the Impact Assessment will reduce the likelihood of similar abuses in the future.
- People have the right to be informed and have a say if they live on the route where the radioactive waste will be transported. Repeated [exposures](#) to low doses of radiation over long periods of time can cause genetic mutations resulting in various cancers, cardiovascular disease, immune system disorders, birth defects, low intelligence and changes to DNA that can be passed from parents to offspring.
- Nuclear workers such as the transport truck drivers, also have a right to be informed of the exposure risks they will incur in the course of transporting radioactive wastes. Such hazards and potential impacts must be thoroughly examined by a full Impact Assessment whose findings will be made public.

CRED-NB's Recommendations:

- The proposed Deep Geological Repository must undergo a full federal Impact Assessment and public hearing so that the public can gain a full understanding of cumulative effects and impacts on people and the environment now and for many generations to come.



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- Transportation of radioactive wastes, including high-level waste fuel from nuclear facilities, and examination of its cumulative impacts and risks must be included in this Impact Assessment.
- The Impact Assessment must evaluate whether or not Indigenous rights are being respected, including the right to consent to the transport of radioactive wastes through their homelands for many years.
- The Impact Assessment process must provide the opportunity for people to be informed and have their say regarding the potential risks to nuclear workers such as the radioactive waste transport truck drivers and those that live on the route where the wastes will be moved.

CRED-NB appreciates this opportunity to share our concerns and offer our recommendations.

Respectfully submitted,

<Original signed by>

Ann McAllister, chair

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