



**The CEDAR Project**  
Sustainability and  
Environmental Studies  
St. Thomas University  
51 Dineen Drive  
Fredericton, New Brunswick  
Canada E3B 5G3  
<https://cedar-project.org>  
[info@cedar-project.org](mailto:info@cedar-project.org)

Deep Geological Repository Project  
Impact Assessment Agency of Canada  
160 Elgin Street, 22<sup>nd</sup> floor  
Ottawa, Ontario K1A 0H3  
[nuclearwaste-dechetsnucleaires@iaac-aeic.gc.ca](mailto:nuclearwaste-dechetsnucleaires@iaac-aeic.gc.ca)

February 4, 2026

**Comment on Initial Project Description – Deep Geological Repository  
(IAAC Reference No. 88774)**

The CEDAR project believes an Impact Assessment is warranted for this project.

I was able read the submission on this file from my research partner, Chief Hugh Akagi of the Peskotomuhkati Nation. I urge you to read the Nation's submission carefully and consider the words about environmental racism and the need to uphold the UN Declaration on the Rights of Indigenous Peoples.

The project period is more than 160 years, the project description is complex, the matter under consideration is the long-term effects of a radioactive material that will remain hazardous for hundreds of thousands of years. Yet, the comment period is 30 days. I am deeply dismayed that the IAAC agreed to go along with this charade. As a former federal public service professional, I understand the obligation to obey directives, but we are never obliged to commit injustice.

With respect.

Sincerely,

Susan O'Donnell, PhD  
Adjunct Research Professor  
Lead Investigator, the CEDAR Project