



Deep Geological Repository for Canada's Used Nuclear Fuel Project  
Impact Assessment Agency of Canada  
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February 4, 2026

**RE: Environment North Response to NWMO's Initial Project Description – Deep Geological Repository (IAAC Reference No. 88774)**

Thank you for the opportunity to provide comments in response to the Nuclear Waste Management Organization's ("NWMO") Initial Project Description ("IPD") for the proposed Deep Geological Repository ("DGR").<sup>1</sup>

Environment North is a registered charitable organization based in Thunder Bay, Ontario. Our mandate is to benefit the community by protecting the environment and increasing the public's understanding of environmental issues. This organization works to improve and protect ecological sustainability and the socio-economic well-being of Northwestern Ontario through leadership, research, partnerships, education, advocacy, information and capacity building.

Please find enclosed the affidavits from members and leaders of Environment North, who have extensive experience, knowledge, and long-standing involvement in nuclear waste advocacy and public participation in Northwestern Ontario.

Thank you for considering our comments. We trust they will assist the Agency in its review of the IPD in determining the appropriate next steps under the *Impact Assessment Act*.

Sincerely,

Graham Saunders  
President, Environment North  
Email: [weatherw@tbaytel.net](mailto:weatherw@tbaytel.net)  
Telephone: 807-475-9663

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<sup>1</sup> Nuclear Waste Management Organization, [Initial Project Description](#): Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project (December 2025) [IPD].

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## **Review of the Initial Project Description for the Deep Geological Repository Project by Environment North to the Impact Assessment Agency of Canada**

**February 4, 2026**

### **I. INTRODUCTION**

Environment North provides these comments in response to the Impact Assessment Agency of Canada’s (“**Agency**”) call for feedback on the Nuclear Waste Management Organization’s (“**NWMO**”) Initial Project Description (“**IPD**”) for the proposed Deep Geological Repository (“**DGR**”).

This submission is concerned with foundational issues that go to the adequacy of the IPD and the Agency’s ability to meet the objectives under the *Impact Assessment Act* (“**IAA**”). In particular, Environment North raises concerns that include, but are not limited to:

- The exclusion of transportation from the scope of the IPD, despite transportation being an integral component of the project and a main source of concern for communities across the border region that would bear the burden of project-related risks;
- Reliance on the concept of an “informed and willing” host community, where there are concerns that the proposed host communities – as well as communities along and downstream the transportation corridors – have not been provided with sufficient or complete information to support informed decision-making; and
- Meaningful public participation and access to information, including whether affected communities have been afforded adequate opportunities to understand the project, ask questions, and have their concerns meaningfully considered at an early stage pursuant to section 16(2)(d) of the *IAA*.

The affidavits submitted with this comment constitute input under section 16(2)(d) of the *IAA* and provide relevant and experience-based evidence regarding public participation, access to information, and long-standing engagement in nuclear waste issues.<sup>2</sup> We ask that they be carefully reviewed by this project’s Integrated Review Team.

### **II. THE AGENCY OUGHT TO REQUIRE AN IMPACT ASSESSMENT**

The proposed DGR is a project of profound significance involving the long-term handling, transportation, and management of Canada’s high-level nuclear waste over a period that extends far beyond the 160 years referenced in the IPD. The potential effects of this first-of-its-kind project – including the long-lived effects on the environment, human health, and Indigenous

<sup>2</sup> Affidavit of Mary Veltri (Affirmed February 4, 2026) [**Veltri Affidavit**]; Affidavit of Doris LeGassick (Affirmed February 4, 2026) [**LeGassick Affidavit**]; Affidavit of Graham Saunders (Affirmed February 4, 2026) [**Saunders Affidavit**]; Affidavit of Kerstin Muth (Affirmed February 4, 2026) [**Muth Affidavit**].

rights – cannot be adequately understood, assessed, or addressed if we rely on the current draft of the IPD.

Environment North understands that pursuant to section 16(1) of the *IAA*, the Agency must decide whether an impact assessment of the designated project is required. We submit that there is ample support – in keeping with the factors set out in 16(2) – that merits this project proceeding for an impact assessment. In particular, the nature and scope of the effects that would be required to be examined under section 22 of the *IAA* – including cumulative, long-term, and interprovincial effects, and impacts on the rights of Indigenous peoples – cannot be adequately identified or assessed on the basis of the information provided in the IPD.

Environment North submits that an impact assessment is the best available tool to:

- Assess adverse effects within federal jurisdiction (ss. 6, 16(2)(b), (c) and (f.1) and 22(1)(c) of the *IAA*);
- Evaluate cumulative, regional, and long-term risks (ss. 22(1)(a)(i),(ii) and (iii));
- Facilitate meaningful participation (ss. 16(2)(d), 22(1)(n) and 27); and
- Support transparent and accountable decision-making (s. 22(1)(n)).

As detailed below and in the accompanying affidavits, the IPD contains critical information gaps that prevent affected communities – including communities beyond the proposed host communities – from understanding the true impacts of this project and how their concerns will be considered throughout the process. In these circumstances, an impact assessment is necessary to ensure that the public interest objectives and requirements under the *IAA* are satisfied.

### **III. GAPS IN THE INITIAL PROJECT DESCRIPTION**

There are two significant issues in the NWMO’s framing of the project that must not be accepted by the Integrated Review Team, namely, the exclusion of transportation activities from the project scope and the narrow approach to public participation and engagement.

Environment North respectfully urges the Agency to ensure the concerns and gaps we raise, below, will be remedied in subsequent stages of the IA, including the Tailored Impact Statement Guidelines (“**TISGs**”). It is crucial that the guidelines require the inclusion of this crucial information, if our organization, the public and the Review Panel are to fully understand and assess the potential impacts of the project being proposed.

#### **1. Exclusion of Transportation from the Scope of the IPD**

Environment North opposes the explicit exclusion of “transportation of used fuel from reactor sites to the Project beyond primary and secondary access roads at the Project site” from the scope

of the IPD, on the basis that this activity will be regulated separately by the Canadian Nuclear Safety Commission (“CNSC”).<sup>3</sup> As the NWMO states in the IPD:

"[T]ransportation activities along the new access roads, site roads, and rail spur constructed for the Project, and activities related to the Project within broader transportation networks remain outside the Project's scope."<sup>4</sup>

Environment North submits that this framing improperly narrows the project scope by excluding activities that are integral to the long-term management of high-level nuclear waste.

Transportation activities, which include the handling, packaging and preparation of the high-level waste, are necessary to the DGR and supported by legislated requirements set out in the *Nuclear Fuel Waste Act* (“*NFWA*”), the *IAA*, and its regulations.

As proposed, this project would require transporting 5.9 million bundles of used nuclear fuel across thousands of kilometres from facilities in New Brunswick, Ontario, Québec, and Manitoba – daily over a period of approximately 50 years,<sup>5</sup> creating sustained and cumulative risks for communities along and downstream the transportation routes.

The accompanying affidavits demonstrate the longstanding and unresolved concerns that Environment North members have critically raised, related to transportation, including but not limited to:

- The movement of used nuclear fuel through populated communities and the downstream impacts;
- The adequacy of road, rail and bridge infrastructure along the transportation route to handle the anticipated volume, frequency and weight of the transport containers being shipped to the DGR;
- The frequency of transport truck collisions on the Trans Canada highway, especially the section between Nipigon to the proposed DGR site past Ignace and the frequency of train derailments in the region;
- The lack of current and true-to-scale testing of the transport containers for high-level radioactive nuclear waste relevant for the terrain and environment of northern Ontario;
- The adequacy of emergency preparedness and response capacity for communities along the transportation routes; and
- The disproportionate burden placed on non-host communities that would bear project-related risks without any decision-making authority.

In the absence of an impact assessment that includes transportation within its scope, these transportation-related effects cannot be meaningfully assessed, and the availability of information necessary for public and Indigenous understanding would be constrained. This

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<sup>3</sup> [IPD](#), vii & 26.

<sup>4</sup> [IPD](#), 26

<sup>5</sup> [IPD](#), 67.

would undermine the ability of affected members of the public and Indigenous Nations to understand potential impacts and have access to information, allowing them to make informed comments regarding the effects on the environment.

**a. Nuclear licensing is not an adequate substitute for a federal impact assessment**

Environment North submits that reliance on the federal regulatory licensing process set out in the *Nuclear Safety and Control Act* is neither a sufficient nor equivalent alternative to a federal impact assessment under the *IAA*.

Unlike an impact assessment, which examines the full lifecycle of a project and its direct and incidental effects before a decision is made, the CNSC's licensing regime considers a much narrower range of factors, limiting the full understanding and assessment of cumulative and long-term impacts.<sup>6</sup> More specifically, the impact assessment process reviews all activities within the lifespan of the project, from development through to decommissioning, including impacts of projects which are 'direct or incidental' to the project, prior to any decision being made regarding its development. Relative to an impact assessment, relying on the CNSC's review process to inform understandings of adverse effects and impacts is a major step backwards - both for procedural safeguards and decision-making that takes into account cumulative, lifecycle effects.

In contrast to the Agency, the CNSC has maintained its narrow regulatory focus, adopting an individualized or a stage-specific approach to engagement with licensing narrowly defined by the stage of activity being licensed and the life-cycle, which is divided into five licence categories for: (1) site preparation, (2) construction, (3) operations, (4) decommissioning; and (5) abandonment. This piecemeal licensing approach is not effective in assessing a project's actual adverse effects because it provides no upfront review of all stages of the project's life.

**b. Nuclear Fuel Waste Act requires the inclusion of handling and transportation activities within this impact assessment**

The *NFWA*, which came into force in 2002, establishes a comprehensive legislative framework for the long-term management of nuclear fuel waste in Canada.<sup>7</sup> The purpose of *NFWA* is to:

provide a framework to enable the Governor in Council to make, from the proposals of the waste management organization, a decision on the management of nuclear fuel waste that is based on a comprehensive, integrated and economically sound approach for Canada.<sup>8</sup>

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<sup>6</sup> R v Ramana & Kerrie Blaise, "Regulation vs promotion: Small modular nuclear reactors in Canada" (September 2024): online, <[sciencedirect.com/science/article/pii/S0301421524002489](https://www.sciencedirect.com/science/article/pii/S0301421524002489)>.

<sup>7</sup> *Nuclear Fuel Waste Act* (S.C. 2002, c. 23) [**NFWA**]

<sup>8</sup> *NFWA*, s 3

Consistent with this purpose, the *NFWA* defines “management” as:

*management*, in relation to nuclear fuel waste, means long-term management by means of storage or disposal, including handling, treatment, conditioning or transport for the purpose of storage or disposal (emphasis added).<sup>9</sup>

The *NFWA* created the NWMO and specified that within 3 years of the Act coming into force, the NWMO would recommend to the Minister of Natural Resources one of three possible approaches for the management of nuclear fuel waste: (1) a deep geological disposal in the Canadian Shield, (2) storage at nuclear sites; or (3) a centralized storage, either above or below ground.<sup>10</sup>

In 2005, after the legislated three-year study, the NWMO recommended an approach they named “Adaptive Phased Management,” which had as its end point a deep geological repository. In 2007, the federal cabinet selected Adaptive Phased Management (“APM”) based on the NWMO’s recommendation as a plan for storing and managing high-level radioactive waste (e.g., used nuclear fuel).<sup>11</sup> Notably, the APM includes transporting the waste produced by Canada’s existing reactors from reactor sites to a centralized location, transferring the wastes from transportation packages to a specialized container, and emplacing the wastes in a deep geological repository.<sup>12</sup>

Indeed, as the NWMO has recognized, “Transportation of used nuclear fuel to a centralized facility is a necessary component of implementing Adaptive Phased Management (APM) for the long-term management of Canada’s used nuclear fuel” (emphasis added).<sup>13</sup> The same sentiment is also reflected in the NWMO’s final study, named “Choosing a Way Forward - The Future Management of Canada’s Used Fuel Waste,” and within it, the phases to implement the preferred management approach.<sup>14</sup> Accordingly, we now find ourselves at Phase 1: Preparing for Central Used Fuel Management, which, among the activities, necessarily includes:

Undertake site characterization, safety analyses and an environmental assessment for the shallow underground storage facility, underground characterization facility and deep geological repository at the central site, and to transport used fuel from the reactor site (emphasis added).<sup>15</sup>

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<sup>9</sup> *NFWA*, s 3

<sup>10</sup> *NFWA*, s 12

<sup>11</sup> Nuclear Waste Management Organization, “APM DGR Preliminary Description” (December 2016) at 2, online (pdf): <acee-ceaa.gc.ca/050/documents/p17520/116734E.pdf>.

<sup>12</sup> Kerrie Blaise & Shawn-Patrick Stensil, “Small Modular Reactors in Canada: Eroding Public Oversight and Canada’s Transition to Sustainable Development” (2020).

<sup>13</sup> Nuclear Waste Management Organization, “[Background - Transportation](#)” (2009) at 1.

<sup>14</sup> Nuclear Waste Management Organization, Final Study: Choosing a Way Forward — The Future Management of Canada’s Used Nuclear Fuel (Report, November 2005), Table 1-1.

<sup>15</sup> *Ibid.*

For the NWMO to now exclude transportation from the impact assessment despite it being inherent to the management of nuclear fuel waste, would be incongruous with the intent of the *NFWA*, its purposes, definitions and processes, that reflect the direction and intent of Parliament, and undermine the public's trust in the process that has predated this IA.

Environment North submits that the impact assessment process must be conducted in a manner that is harmonious with the broader legislative scheme established by the *NFWA*, and should reflect the intent of the legislation, the supporting studies, and the consultation and planning that led to the project now under review by the Integrated Review Team.<sup>16</sup>

**c. *Impact Assessment Act* regulations require the inclusion of all project phases and associated activities**

Environment North does not accept the NWMO's contention that transport is excluded by virtue of not being independently listed in the *Physical Activities Regulations*.<sup>17</sup> As the NWMO states in their IPD:

This NWMO Project is not part of a larger project listed on the *IAA*'s project list. Its scope includes lifecycle phases associated with the construction and operation of the DGR, while site characterization, decommissioning, closure, and post-closure monitoring phases will remain under the regulatory oversight of the CNSC pursuant to the NSCA. These phases do not independently trigger the *IAA*, as they are not listed in the *Physical Activities Regulations* (emphasis added).<sup>18</sup>

This statement is incongruent with the *IAA* and not supported by the language used in it or its regulations. The *Physical Activities Regulation* exists by virtue of the regulation-making power set out in section 109 of the *IAA*. Per s 2 of the *IAA*, a *designated project* means one or more physical activities that

- (a) are carried out in Canada or on federal lands; and
- (b) are designated by regulations made under paragraph 109(b) or designated in an order made by the Minister under subsection 9(1). It includes any physical activity that is incidental to those physical activities (emphasis added)

This project accordingly requires an impact assessment by virtue of s 28(b) listing this project as a physical activity:

**28** The construction and operation of either of the following:

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<sup>16</sup> *Rizzo & Rizzo Shoes Ltd (Re)*, [1998] 1 SCR 27; *Bell ExpressVu Limited Partnership v Rex*, 2002 SCC 42; *ATCO Gas & Pipelines Ltd v Alberta (Energy & Utilities Board)*, 2006 SCC 4.

<sup>17</sup> *Physical Activities Regulations*, SOR/2019-285.

<sup>18</sup> [IPD](#), 19.

(b) a new facility for the long-term management or disposal of irradiated nuclear fuel or nuclear waste.

The requirements, including activities that must then be set out in the IPD is then prescribed in the *Information and Management of Time Limits Regulations*, which requires the NWMO to:

- List of all activities, infrastructure, permanent or temporary structures and physical works to be included in and associated with the construction, operation and decommissioning of the project;<sup>19</sup>
- Include site maps produced at an appropriate scale in order to determine the project's proposed general location and the spatial relationship of the project components.<sup>20</sup>

Environment North therefore submits that the NWMO's vision for the project, as set out in the IPD, cannot override statutory requirements as set out in the *IAA* and its regulations.

#### **d. Transportation has not achieved broad social acceptability**

According to the NWMO's Preliminary Transportation Plan, “[f]or a site to be selected, the NWMO will need to demonstrate the following: (1) [a] deep geological repository can be safely implemented with a strong technical safety case; (2) [t]he project can be implemented in partnership with informed and willing hosts; and (3) [c]onfidence that a safe, secure and socially acceptable transportation plan can be developed” (emphasis added).<sup>21</sup> Transportation has therefore always been an integral component of the proposed DGR, and has been repeatedly emphasized in the NWMO's public participation and planning documents.

Environment North submits that NWMO should be required to subject its transportation plan to the rigours and public scrutiny of a federal impact assessment to determine whether the transportation plan is, in fact, "safe, secure and socially acceptable.” It is not sufficient for the NWMO itself to be confident in all aspects of its proposal; the purpose of the impact assessment is to examine the cumulative impacts of the project in its entirety and to provide meaningful opportunities for public input. People who live in this region have first-hand experience with the risks and hazards associated with highway transportation, including accidents, road closures due to inclement weather, and traffic disruptions caused by oversized loads. Many other communities along the entire length of the transportation routes would similarly be affected and must be afforded an opportunity to weigh in on this aspect of the project.

A further role of a federal impact assessment is to ensure that the CNSC and Transport Canada's regulatory frameworks are adequate and up to date given the unprecedented volume, frequency, distances, and long duration of transporting high-level radioactive nuclear fuel waste.

<sup>19</sup> Information and Management of Time Limits Regulations, SOR/2019-283, Schedule 1 Information Required in Initial Description of Designated Project, Part A General Information, s 9.

<sup>20</sup> *Ibid*, s 13(b)

<sup>21</sup> Nuclear Waste Management Organization, “[Preliminary Transportation Plan](#)” (December 2021) at 13.

## **2. Meaningful Public Participation Merits an Impact Assessment**

Meaningful public participation requires that all potentially affected communities be provided with timely, accessible information and meaningful opportunities to ask questions, understand all potential effects, and have their concerns considered before key decisions are made. This principle is central to the *IAA* and is particularly important in the context of the proposed DGR.

The public concern surrounding the proposed DGR is both widespread and long-standing, reflecting the interests of communities whose health, lands, waters, and well-being may be directly or indirectly affected by a project of this nature. In this context, the duty to provide meaningful opportunities extends beyond the proposed host communities to all potentially affected communities.

In the absence of an impact assessment, affected members of the public are deprived of the information, procedural safeguards, and forum necessary to understand potential impacts and to be heard in a meaningful way. As we detailed above, no alternative regulatory process would provide a comparable mechanism for ensuring informed participation, transparency, and public accountability at this stage of decision-making.

### **a. The IPD limits the scope of public participation and decision-making**

Environment North submits that the high level of public concern regarding the proposed DGR merits the designation of a federal impact assessment, in keeping with section 11 of the *IAA*:

**11** The Agency must ensure that the public is provided with an opportunity to participate meaningfully, in a manner that the Agency considers appropriate, in its preparations for a possible impact assessment of a designated project, including by inviting the public to provide comments within the period that it specifies (*emphasis added*).

Despite this statutory requirement, the NWMO's engagement approach, as described in the IPD, is narrow in scope and limited in reach. In particular, the engagement efforts have focused primarily on the proposed host communities, with limited opportunities for participation by communities along the transportation routes or downstream. Environment North is concerned that the Agency, CNSC, and the NWMO are scoping "who is impacted" through a geographic-radius lens rather than through an effects-based analysis that accounts for the full range of communities that are potentially affected by the project.

The proposed DGR is not a local project with only local effects: it is a national nuclear waste management undertaking with implications extending beyond the proposed host communities. The impact assessment for this project should therefore explicitly reject rigid geography- and distance-based assumptions and instead adopt an effects-based approach that meaningfully

considers wherever they may occur, including along the transportation corridors and in downstream or otherwise affected communities.

**b. Persistent public concern reflects unmet expectations for meaningful participation**

The accompanying affidavits demonstrate a long history of public engagement on nuclear issues in Northwestern Ontario. Since at least the late 1970s, members of Environment North have taken proactive efforts to engage with federal, provincial, and municipal decision-makers, including, but not limited to:

- Participating in formal public hearings, commissions, and parliamentary proceedings related to nuclear waste management;<sup>22</sup>
- Preparing and submitting written reports, media releases, resolutions, and public comments addressing the environmental, health, transportation, and social risks associated with nuclear waste disposal;<sup>23</sup>
- Delivering municipal deputations, preparing presentations, participating in plebiscites, and engaging in public education through community meetings and public events;<sup>24</sup>
- Organizing, attending, and contributing to public forums, rallies, and dialogue sessions concerning the siting, transportation, and long-term management of used nuclear fuel;<sup>25</sup> and
- Undertaking independent efforts to facilitate public access to project information, including contacting and working with local public libraries to ensure that hard copies of the IPD are made available to community members where such access was otherwise limited.<sup>26</sup>

Significant and ongoing public concern regarding the proposed DGR project is also evidenced by, among other things:

- Plebiscites and municipal resolutions opposing nuclear waste siting in Northwestern Ontario;<sup>27</sup>
- Petitions and postcard campaigns opposing the transportation and disposal of used nuclear fuel through the region;<sup>28</sup>
- Frequent letters to the editors and governments, media interviews, and public statements raising concerns about transportation risks and long-term safety;<sup>29</sup> and

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<sup>22</sup> Saunders Affidavit at para 7 and 8(e).

<sup>23</sup> LeGassick Affidavit at para 8(b); Saunders Affidavit at para 8(a) and (h); Muth Affidavit at para 8 and 10.

<sup>24</sup> Veltri Affidavit at para 9(c) and (e); LeGassick Affidavit at para 8(a) and (d); Saunders Affidavit at para 8(e); Muth Affidavit at para 9.

<sup>25</sup> Veltri Affidavit at para 9(b) and (d); LeGassick Affidavit at para 8(a); Saunders Affidavit at para 8(e).

<sup>26</sup> Veltri Affidavit at para 26.

<sup>27</sup> Saunders Affidavit at para 8(d); Muth Affidavit at para 9.

<sup>28</sup> Veltri Affidavit at para 9(a); LeGassick Affidavit at para 8(d); Saunders Affidavit at para 8(b).

<sup>29</sup> Veltri Affidavit at para 9(b) and (f); LeGassick Affidavit at para 8(b) and (c); Saunders Affidavit at para 8(c); Muth Affidavit at para 8.

- Sustained opposition and expressions of concern from organizations, municipalities, Indigenous Nations, and community members who are not the proposed host communities, but would nonetheless bear project-related risks.<sup>30</sup>

Despite decades of sustained public engagement on nuclear waste issues in Northwestern Ontario, as documented in the accompanying affidavits, the IPD does not adequately reflect the concerns consistently raised by affected communities. In particular, the section of the IPD discussing key issues raised through public engagement does not address the repeated concerns regarding the risks associated with transporting the large volume of nuclear waste over such a long distance, the risks associated with the DGR itself, and the lack of input from all impacted First Nations and communities in the site selection decision. Taken together, these concerns point to a lack of broad social acceptance to the concept of the DGR, particularly one that is located thousands of kilometres from the reactor sites.

Accordingly, the level, duration, and persistence of public concern surrounding the proposed DGR strongly support the designation of a federal impact assessment. This tool is necessary to ensure meaningful participation and public awareness in a manner consistent with the purposes and objectives of the *IAA*.

### **c. Alternative Means of Carrying out the Project**

Environment North submits that a comprehensive examination of the alternatives to the proposed DGR is required, including continued on-site storage of used nuclear fuel at reactor locations in enhanced and more robust storage facilities. According to the CNSC,

“[s]pent nuclear fuel is currently stored onsite at nuclear power plants either in wet bays or dry canisters. Both methods are considered safe, secure and environmentally sound.”<sup>31</sup>

Pursuant to section 22(1)(e) and (f) of the *IAA*, a federal impact assessment must consider alternative means of carrying out the project, including a comparative analysis taking into account the risks associated with the DGR and long-distance transport versus the current safe on-site storage method, as well as the comparative carbon footprint, and the impacts on Indigenous communities and their rights.

While the APM approach was approved by Cabinet, prompting the NWMO to fully explore the possibility of a DGR, this approval was granted without the benefit of a federal impact assessment. Cabinet approval of a policy framework cannot pre-empt or substitute the role of the *IAA*.

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<sup>30</sup> Veltri Affidavit at para 9(g); LeGassick Affidavit at para 8(e); Saunders Affidavit at para 8(h); *see generally* Muth Affidavit.

<sup>31</sup> Canadian Nuclear Safety Commission, “[Fact sheet: Radioactive waste management – Canada’s regulatory process](#)” (2014).

#### **IV. CONCLUSION**

As currently drafted, the framing of the project through the IPD – particularly its exclusion of transportation and limitations in meaningful public participation and engagement – precludes a full understanding of the project’s potential, cumulative, and long-term impacts and threatens to erode the participatory, evidence-based and cumulative-effects approach inherent to IA processes.

The level of public concern regarding the proposed DGR must be taken seriously. The DGR is not confined to a single site, but necessarily includes ancillary and integral components such as the transportation, handling, and long-term management of used nuclear fuel. These components give rise to significant and unresolved concerns about the project’s long-term impacts on the community, environment, and health that cannot properly be addressed through the current IPD.

For the reasons set out above, Environment North submits that the IPD as currently drafted is unable to support informed early planning decisions under the *IAA*, and these gaps and mischaracterizations must be remedied. Accordingly, Environment North submits that a federal impact assessment is required to ensure that the full scope of the project and its potential effects are properly identified, scoped, and assessed. Such an assessment must be robust, independently verified, and publicly justified to properly assess and accommodate project impacts.

Thank you for your consideration of our comments.

Sincerely,

Environment North

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**AFFIDAVIT OF MARY VELTRI**

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I, **MARY VELTRI**, of the City of Thunder Bay in the Thunder Bay District in the Province of Ontario, **MAKE OATH AND SAY**:

1. My name is Mary Veltri. I am a member of the Board of Directors for Environment North, an environmental organization based in Thunder Bay, and I currently serve as Board Secretary.
2. I make this affidavit to share my background, my experience in public education and advocacy related to nuclear issues, and my concerns regarding the Nuclear Waste Management Organization's ("NWMO") Initial Project Description ("IPD") for the proposed Deep Geological Repository ("DGR") for Canada's used nuclear fuel.

**I. BACKGROUND INFORMATION**

3. I am a lifelong resident of Thunder Bay, Ontario.
4. I am a retired lawyer. Over the course of my legal career, I worked at Kinna-Aweya Legal Clinic in the area of poverty law, where I represented clients in a variety of forums, and I was also engaged in community development and public legal education. I was also a part-time instructor in the Indigenous Community Advocacy Program at Confederation College for approximately five years.

5. My home is located approximately 75 metres from Highway 11/17, a major transportation corridor through Thunder Bay, Ontario, where nuclear waste will be transported twice daily, nine months of the year, for 50 years. I regularly travel on Highway 11/17 as part of my daily life and have done so for many years. I am therefore directly impacted by the proposed transportation of nuclear waste from Southern Ontario, Quebec, and New Brunswick.

## **II. MY EXPERIENCE IN ENVIRONMENTAL ADVOCACY**

6. For more than 25 years, I have been involved in various environmental campaigns in Thunder Bay as a concerned citizen.
7. Since the fall of 2023, I have been actively involved in Environment North's campaign to oppose the siting of a DGR in Northwestern Ontario.
8. Environment North is a member of the alliance We the Nuclear Free North, and I am a member of its core group, which meets weekly or biweekly by video conference.
9. My involvement in this advocacy has included, but is not limited to:
  - a. Assisting with the development and circulation of petitions to Parliament and to the City of Thunder Bay.
  - b. Participating in joint deputations before municipal councils, including Thunder Bay, Schreiber, and Terrace Bay. Attached collectively as **Exhibit 'A'** are copies of three representative joint deputations that I have participated in, delivered on April 23, 2024, May 21, 2024, and August 26, 2024, expressing concerns about the transport and disposal of nuclear waste in Northwestern Ontario. Attached as **Exhibit 'B'** is a letter to the City of Thunder Bay City Clerk, dated July 2, 2024,

requesting an opportunity to make a deputation to City Council regarding the nuclear waste issue.

- c. Helping organize and participate in rallies, including those led by Indigenous Nations and organizations in Northwestern Ontario.
- d. Participating in the Assembly of First Nations dialogue sessions held in Thunder Bay in May 2024 concerning the transportation and storage of used nuclear fuel. A copy of a Final Report on 2024 Dialogue Sessions and Recommendations to the Nuclear Waste Management Organization (NWMO) is attached as **Exhibit 'C'**.
- e. Organizing and staffing public information booths and engaging with members of the public at community events.
- f. Writing letters to elected officials, government ministers, municipalities, and First Nations. Attached collectively as **Exhibit 'D'** are a sample of these letters dated February 20, 2024, January 11, 2026, January 15, 2026, and January 26, 2026.
- g. Engaging in outreach with other environmental and advocacy organizations, including the David Suzuki Foundation, Environmental Defence, and Mining Watch.

10. All of my involvement in this work has been undertaken on a voluntary basis.

### **III. MY CONCERNS REGARDING THE PROPOSED DEEP GEOLOGICAL REPOSITORY**

11. I care deeply about the protection of the earth, land, water, and environment of Northwestern Ontario, and about the long-term consequences that industrial decisions may have for future generations.

12. In my experience, Northwestern Ontario is often treated as a remote or sparsely populated region where large-scale industrial projects are perceived as facing less resistance. I am concerned that siting a DGR in Northwestern Ontario reflects this mindset and risks turning the region into a long-term repository for hazardous waste generated elsewhere, and that approving a DGR could set a precedent for Northwestern Ontario to become a destination for additional industrial or hazardous waste in the future.
13. I have a personal connection to the land and waters of Northwestern Ontario. I have paddled two canoe trips in the Turtle River - White Otter Lake area, a region that contains still-intact stands of old-growth white pine and red pine. These lakes and rivers are at risk of contamination in the event of container corrosion, accidents during waste handling or emplacement, or unforeseen geological events.
14. I am also concerned that communities in Northwestern Ontario are being asked to bear the long-term responsibility and risk of storing accumulated high-level radioactive waste generated elsewhere, despite the region not relying on nuclear power for electricity and not benefiting from employment in the nuclear industry.
15. For these reasons, I believe that the precautionary principle should guide decision-making regarding the DGR, requiring the nuclear industry to continue above-ground storage in robust facilities that can be continuously monitored, close to reactor sites.

#### **A. The Transportation of Used Nuclear Fuel**

16. The transportation of used nuclear fuel is, in my view, an integral component of the DGR project. However, transportation networks and transportation impacts have been excluded from the current scope of the project description.

17. I am concerned for the safety of transporting high-level radioactive waste through populated communities along the transportation routes, including Thunder Bay, Ontario. I am also concerned that the communities along these transportation routes were not consulted, even though they are directly impacted by the project.
18. Based on my understanding, safety buffer zones are typically required around nuclear waste storage facilities. I do not understand how such safety zones could be maintained when used nuclear fuel is transported by road or rail through towns and cities.
19. Highway 11/17 passes through residential areas and near homes, schools, and businesses. I am concerned about what evacuation or protective measures would be available if an accident were to occur along this route. I am also concerned about the cumulative effects of repeated exposure to radiation over time for people living and travelling near transportation routes, including myself, as well as the adequacy of emergency preparedness and response measures in the event of a transportation accident, particularly during winter conditions, severe weather, or road closures.
20. To date, I have not seen clear, accessible, or independent information addressing these concerns.

## **B. The Importance of Meaningful Public Participation**

21. Meaningful public participation in decision-making about projects of this scale and duration matters greatly to me.
22. A core principle, in my view, is that decisions of this nature should be made transparently and that any final approval be based on a thorough review of the environmental, health,

cultural, and economic effects of the project. This is particularly important in the context of the DGR, given that demonstrating social acceptance has consistently been identified as a key factor in determining whether such projects may proceed.

23. To ensure greater fairness in the process, I believe the public comment period for the proposed project should be significantly longer. In my experience, the limited timeframe for responding to a complex, technical project of this nature makes it difficult for members of the public to review the materials and prepare informed submissions. I believe this may discourage participation or result in brief responses that do not fully reflect the nature or extent of public concern.
24. I am also concerned that the assessment process appears to favour the project proponent. It is my understanding that the Impact Assessment Agency has worked closely with the proponent over an extended period to prepare the IPD. In my view, this creates at least the appearance of a lack of independence, which may undermine public confidence in the assessment process.
25. The involvement of the Canadian Nuclear Safety Commission (“**CNSC**”) similarly raises concerns for me regarding institutional neutrality. Based on my understanding, members of the CNSC have professional backgrounds in the nuclear industry, which raises questions about the degree of independence with which concerns about the project may be evaluated.
26. I believe greater effort should be made to ensure that members of the public are aware that the assessment is underway and that public participation is invited. In my experience, access to project materials has been very limited. For example, I am aware that requests

were made for the IPD to be made available in Thunder Bay Public Libraries, where the public has access to computers and the internet. However, as of January 29, 2026, with only five days remaining in the public comment period, the Thunder Bay Waverley Resource Library had no hard copies available. I am personally making efforts to persuade the library staff to provide a printed copy. While hard copies of the IPD were made available at Thunder Bay City Hall as of January 19, 2026, this timing left only approximately two weeks for the public to review the materials and provide comments, which, in my view, is insufficient to support meaningful participation.

### **C. The Site-Selection Process and the “Informed and Willing Host”**

27. I am concerned about the NWMO's characterization of the DGR as a consent-based, community-driven project supported by an “informed and willing host.”
28. Based on my experience, I do not believe this framing reflects the views of the broader region. I am aware of multiple municipalities and First Nations in Northwestern Ontario that have publicly opposed the siting of a DGR in this region, including communities that are not host communities, but that would nonetheless be affected by the transportation and housing of used nuclear fuel. I am concerned that the perspectives of these communities were not meaningfully considered in the process by which consent was obtained.
29. I am further concerned that transportation networks have been excluded from the scope of the project description, despite the fact that transportation is an integral component of the DGR project. The transportation of used nuclear fuel has been one of the most consistently raised public concerns. In my view, excluding transportation from the scope

of review undermines any meaningful assessment of social acceptance, as it limits public input on issues directly affecting community safety, infrastructure, and emergency preparedness.

30. I have observed that the site selection process has been deeply divisive and has contributed to social tensions and fractured relationships, including within and between Indigenous communities.

#### IV. CLOSING

31. Underlying my concerns is a deep sense of grief about the ongoing harm to the earth, and therefore, all the life forms it sustains, as well as the failure to plan responsibly for future generations.

32. I hope that the assessment of this project is conducted with seriousness, transparency, and legitimacy, and that it fully considers the environmental, social, and human impacts of the proposed DGR, including transportation.

AFFIRMED remotely by video conference by **Mary Veltri** of the City of Thunder Bay in the Thunder Bay District of the Province of Ontario, before me at the City of Thunder Bay in the Thunder Bay District in the Province of Ontario on February 4, 2026, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely.

Commissioner for Taking Affidavits

*Jenna Brunt*

Jenna Brunt, LSO #94333B

*Mary Veltri*

Mary Veltri

**Deputation to Township of Council  
April 23, 2024  
by  
Dodie LeGassick and Mary Veltri**

**on Behalf of**

**We the Nuclear Free North and Environment North**

This is **Exhibit "A"** referred to in the  
Affidavit of Mary Veltri  
affirmed before me over video teleconference  
this 4th day of February, 2026.  
The affiant, Mary Veltri, located in Thunder Bay,  
Ontario, and the commissioner, Jenna Brunt, located in  
Thunder Bay, Ontario.

*Jenna Brunt*

A Commissioner, etc.

Jenna Brunt  
Law Society of Ontario #94333B  
705-471-3509

**RE: Concerns About Nuclear Waste in Northwestern Ontario**

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Thank you for allowing us to speak to you this evening about a matter that could have serious negative impacts on your community – its residents and the surrounding environment - for generations to come. We represent WTNFN, an alliance of people and groups, including Environment North, who oppose a Deep Geological Repository for nuclear waste in Northern Ontario. We are also board members of Environment North, an NGO in operation since 1972, which conducts research, education and community advocacy to promote sustainability, protection of the environment and community engagement in decisions impacting the environment.

We, along with a growing number of communities and First Nations and most recently, the Council of Canadians, oppose the transport, burial and abandonment of radioactive nuclear waste in our northern watersheds, as proposed by NWMO. We continually challenge the NWMO to honestly address the risks associated with this proposal and to adopt a broader consultation process that would include all of the communities along the transportation route in their assessment of “willingness”.

We are here today to address our concerns about the NWMO process to establish a deep geological repository (DGR) at Revell Lake located in the Wabigoon Lake Ojibway Nation- Ignace area in northwestern Ontario and the risks associated with transportation of used nuclear fuel waste through your community. We are asking you to consider passing a resolution that supports our campaign to stop the NWMO from proceeding with their northwestern Ontario option.

I would like to first address our concerns with the NWMO and its site selection process. Dodie will be addressing the transportation issues.

**1. The Nuclear Waste Management Organization Prioritizes Nuclear Industry Interests**

The Nuclear Waste Management Organization has been mandated to design, construct and operate a repository, as well as design and implement a site selection process. It was established in 2002 under the **Nuclear Fuel Waste Act**. The Nuclear Industry founded the NWMO and the NWMO’s Board members and advisory council are all appointed by the three

nuclear energy corporations (Ontario Power Generation Inc., Hydro-Quebec and New Brunswick Power Corporation).

Prior to the establishment of the NWMO, the federal government had established an expert panel to oversee an environmental assessment of the Geologic Disposal Concept for High Level Radioactive Waste. In 1998, after a 10-year review of evidence and submissions from public hearings, the Panel concluded that the Canadian public did not support the concept of burying nuclear waste and recommended that a neutral, nuclear fuel waste management agency be created, at arm's length from the utilities and AECL (Atomic Energy of Canada Ltd.) The federal government ignored this key recommendation and instead tasked the industry-controlled Nuclear Waste Management Organization with the responsibility to design and implement a plan for the long-term storage of high-level radioactive waste.

Currently, Canada's active and decommissioned nuclear power plants, located in Ontario, New Brunswick, Quebec and Manitoba, have produced over the past 60 years a stockpile of approximately 3.3 million spent nuclear fuel bundles that increases at a rate of about 90,000 bundles per year (NWMO). If all the currently operating plants live out their licensed lifetimes, they will have to dispose over 6 million fuel bundles. With the NWMO's ever changing plans, it is expected that the high-level radioactive waste from Small Modular Reactors will also be added to the proposed DGR.

Naturally, the industry-led NWMO is keen to bury and abandon the nuclear waste in a remote place so that they can proceed with their plans for expansion of nuclear power despite all the negative impacts caused by the nuclear fuel chain.

Rather than holding wide public consultations, the NWMO's process has been fundamentally unfair and exceedingly partial to what the industry wants. Given the long-term health and environmental risks associated with nuclear waste, we believe broader more inclusive consultation must take place, one that respects the principles of free, prior and informed consent for Indigenous people and includes all potentially impacted people.

## **2. Inadequacy of Canadian Nuclear Safety Commission**

The Canadian Nuclear Safety Commission is the licensing body that is ostensibly in place to regulate the nuclear industry and ensure public safety. Once the NWMO completes its site selection process, it will need to apply for a license from the CNSC. However, the CNSC has repeatedly come under criticism for allowing nuclear operators to violate safety standards and their licence requirements.

One might expect that the NWMO's plans concerning the transportation of nuclear fuel waste, the containers, the repository design are vetted and scientifically vetted and overseen. The Canadian Nuclear Safety Commission (CNSC) is the regulator, so one would think that it carefully reviews the NWMO's technical plans, and uses its power to say yes or no to them. However, this is not the case.

The CNSC follows the nuclear industry's lead. Rather than setting safety standards, the Commission merely reviews whether the industry is following its own rules. And even when the industry breaks its own rules, as was on the news recently in the case of the Canadian Nuclear

Laboratories buried reactor at Pinawa, CNSC will issue relatively small fines. CNSC has never withheld a licence to a nuclear facility. As a result, the CNSC is often referred to as a “captured regulator”.

This unfettered delegation of power to the NWMO, without government oversight, has enabled the NWMO to design its own processes for consultations, determination of “willingness” and definition of “host community. We therefore suspect that the CNSC licensing process will simply be a rubber stamping of the NWMO decision

### **3. Lack of Consultation with Communities Directly Affected by the Proposal**

Environmental justice requires that the people who are affected by a decision ought to be consulted. Despite living along the transportation route where Schreiber residents will have daily exposures of gamma radiation from the transports or train cars carrying nuclear waste, your community, has not been directly engaged in a consultation process. Your community will also be exposed to the risk of catastrophic harm resulting from an accident or military attack. It is not fair that residents along the route have been excluded from the willingness process, not informed of the risks, nor given a say in the process.

It is only Ignace and Wabigoon Lake Ojibway Nation who will decide for all of us in northwestern Ontario whether there is willingness to have the DGR sited in our region. Interestingly, the Revell Lake site is not even within the town boundaries of Ignace nor within its watershed. Communities closer to the proposed site and living downstream have also been excluded from the consultation process.

We believe a proposal with the potential for this magnitude of regional impacts should not proceed without regional input, particularly from communities along the transportation route and downstream from the proposed site.

### **4. Willingness Process**

The NWMO has stated that they will only proceed in an area with “willing and informed hosts.” Willingness suggests consent is freely given. However, the power imbalance between the nuclear industry and the small, regionally-isolated and economically-marginalized community of Ignace with a population of 1,200 is huge. This raises many ethical questions.

The NWMO has deep pockets (funded by utility ratepayers) and has been trying to buy consent by pouring cash into Ignace to engage and seek their support. In 2023 alone Ignace received \$1.7 million for local projects and infrastructure as part of their funding agreement. To date, they have received an estimated \$10 million with millions more promised with the signing of the hosting agreement.

Similarly, “informed” implies that the community has received information about the risks and benefits of being a host community. However, the NWMO materials do not address any of the risks associated with their proposal or the harms associated with radioactive exposure and contamination. The NWMO plan to transport, process and bury high-level nuclear waste is not a complete plan. It includes a number of ‘concepts’ which are still being developed, and there are large gaps in the information. How can the residents be informed about a plan that lacks concrete details and material facts?

### **5. Environmental Justice**

A fundamental principle of environmental justice is that environmental benefits and burdens should be equitably distributed among all persons, rather than allowing the majority of adverse

impacts to be unfairly imposed upon visible minorities, Indigenous and/or marginalized communities. We oppose the imposition of a repository for all of Canada's nuclear waste in northwestern Ontario because we do not rely on nuclear energy as a source of electricity. Northwestern Ontario's energy supply comes from hydro, biomass, solar and wind. It is Southern Ontario and New Brunswick that have relied on and reaped the benefits from nuclear energy. In keeping with the proximity principle, and environmental justice, the nuclear waste ought to be stored as close to the site of generation as possible.

Finally, there are many uncertainties about the whether the repository will be able to prevent radioactive materials leaking out into the water and earth over the hundreds of thousands of years for which they will remain hazardous. There are many unanswered questions about the properties of the fuel over such immense time frames, the behaviour of the geological formations, the ability of human technology to withstand environmental pressures over decades, much less thousands and hundreds of thousands of years and the possibility of cataclysmic events. While our generation may not experience the negative consequences of this plan, it is an intergenerational injustice to burden people not yet born with the impacts caused by burying radioactive waste.

**Deputation to Terrace Bay Town Council**

**May 21, 2024**

**By**

**Dodie LeGassick and Mary Veltri**

**On Behalf of:**

**We the Nuclear Free North and Environment North**

**RE: Concerns About Nuclear Waste in Northwestern Ontario**

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**Introduction:**

Thank you for allowing us to speak this evening about a matter that could have serious consequences for our community and all of Northwestern Ontario. We represent WTNNFN, an alliance of people and groups, including Environment North, who are opposing a Deep Geological Repository for nuclear waste in Northwestern Ontario. We are also board members of Environment North, an NGO in operation since 1972, which conducts research, education and community advocacy to promote sustainability, protection of the environment and community engagement in decisions impacting the environment.

**Background:**

1. The Nuclear Waste Management Organization (NWMO) is in the process of trying to secure a “willing host” where they can dispose of Canada’s high level radioactive waste in a deep geological repository (DGR).<sup>1</sup> This process is scheduled to be completed this year. Two potential sites are under consideration: Teeswater, located in the Saugeen Ojibway Nation- South Bruce area and the Revell site in the Wabigoon Lake Ojibway Nation-Ignace area.
2. There is growing opposition to siting the proposed DGR at the Revell site for a number of reasons. Today we wish to focus on two major concerns directly impacting the residents of Terrace Bay:
  - the lack of fairness in excluding communities along the north shore from the “willingness” process; and
  - the environmental impact of transporting nuclear waste

**Lack of Consultation with Communities Directly Affected by the Proposal**

3. The NWMO, a body created by the nuclear industry, has devised a very narrowly-scoped engagement strategy that serves the industry’s interests but ignores the views of the

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<sup>1</sup> By the end of their lifespans, Canada’s existing nuclear reactors are projected to produce more than 5.6 million bundles of fuel waste, weighing over 100,000 tonnes. As of 2023, Canada’s existing inventory is about 3.3 million used nuclear fuel bundles. If stacked like cordwood, this high level radioactive waste could fit into about nine NHL hockey rinks from the ice surface to the top of the boards. The NWMO expects these projections to increase with the addition of new nuclear reactors and SMR’s. Nuclear Waste Management Organization Nuclear Fuel Waste Projections in Canada -2023 Update

majority of people impacted by their decision. Their consultation process has failed to engage or seek consent from the residents of Terrace Bay and other communities along the transportation route even though they will be directly affected by the shipments of high-level radioactive waste by rail or by road for a period of 50 years.

4. The necessity of having “**broad public support**”, to ensure the acceptability of any disposal method for managing nuclear fuel wastes, has been a guiding principle for the nuclear industry in Canada since the Seaborn Panel completed their independent environmental assessment of the DGR concept in 1998.<sup>2</sup> International norms for the siting of nuclear waste disposal have continued to include a decision-making process that embodies **procedural fairness and public acceptance**.<sup>3</sup>
5. Despite paying lip service to the principle of ensuring there is “willingness” for their decision, NWMO has unilaterally decided to seek consent from only two small communities in Northwestern Ontario – Ignace and Wabigoon Lake Ojibway Nation - with a combined population of about 1,360 residents. Meanwhile the rest of us in Northwestern Ontario have been shut out from the consultation process. The Revell site is not in Ignace boundaries.
6. We believe a project of this magnitude, with an environmental footprint and risk to our health and safety of this scale, should at the very least be a regional decision. The consultation process NWMO has followed is a far cry from gaining broad public support as recommended by the Seaborn Panel.

### **Willingness Process**

7. The NWMO states that they will only proceed in an area with “willing and informed hosts.” “Willingness” suggests consent is freely given. However, the power imbalance between the nuclear industry and the small, regionally-isolated and economically-marginalized communities of Ignace and Wabigoon Lake Ojibway Nation is huge. The recently completed voting process in Ignace was not at all straightforward. Rather, a consultant was hired to study community willingness using an online poll to the willingness engagement committee who will in turn make a recommendation to council on whether to proceed or withdraw as a potential host community for an underground nuclear waste repository.
9. The NWMO has deep pockets (funded by utility ratepayers) and has been trying to buy consent by pouring cash into these communities to seek their support. To date, Ignace has received an estimated \$10 million with millions more promised upon the signing of the hosting agreement.
10. Similarly, “informed” implies that the community has received objective information about the risks and benefits of being a host community. However, the NWMO either avoids or downplays the economic, social and environmental costs of managing radioactive waste.

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## **2**

Environmental Assessment Report on AECL's Geologic Disposal Concept for High Level Radioactive Waste, Executive Summary ([http://www.ccnr.org/hlw\\_fearo\\_summary.html](http://www.ccnr.org/hlw_fearo_summary.html))

<sup>3</sup> Yokoyama, M., Ohnuma, S., Osawa, H. *et al.* Public acceptance of nuclear waste disposal sites: a decision-making process utilising the ‘veil of ignorance’ concept. *Humanit Soc Sci Commun* **10**, 623 (2023). <https://doi.org/10.1057/s41599-023-02139-2>

11. The plan to transport, process and bury high-level nuclear waste is not a complete plan. It includes a number of 'concepts' which are still being developed, and there are large gaps in the information. How can the residents be informed about a plan that lacks concrete details and material facts?

### **Environmental Justice**

12. A fundamental principle of environmental justice is that environmental benefits and burdens should be equitably distributed among all persons, rather than unfairly imposing the majority of adverse impacts upon Indigenous and/or marginalized communities. We do not benefit from nuclear energy in Northwestern Ontario so why should we bear the burden of storing its waste? Our energy supply comes from hydro, biomass, solar and wind. It is Southern Ontario and New Brunswick that have relied on and reaped the benefits from nuclear power. In keeping with the proximity principle, and environmental justice, nuclear waste ought to be stored as close to the site of generation as possible.
13. There are many technical challenges to claims that the repository will be able to prevent radioactive materials leaking out into the water and earth over the hundreds of thousands of years for which they will remain hazardous. There are uncertainties about the properties of the fuel, the behaviour of the geological formations and the ability of the technology to withstand environmental pressures over such an immense time frame as well as the possibility of cataclysmic events. While our generation may not experience the negative consequences of this plan, it is an intergenerational injustice to burden people not yet born with the impacts caused by burying radioactive waste.
14. Multiple First Nations in Robinson Superior and Treaty 3 territories, as well as municipalities along the transportation route such as Red Rock and Nipigon or downstream from the proposed site such as Grassy Narrows and LaVallee have expressed opposition to the NWMO proposal. By joining these communities, Terrace Bay will be speaking up for the environment and telling the NWMO that they oppose their unreasonable scheme to make Northwestern Ontario the dumping ground for all of Canada's high level nuclear waste.

**Deputation to Thunder Bay City Council  
August 26, 2024**

**by**

**Charles Faust and Mary Veltri**

**on Behalf of**

**Environment North  
Nuclear Free Thunder Bay  
We the Nuclear Free North**

**RE: Concerns About Transporting and Disposal of Nuclear Waste in Northwestern Ontario**

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**Introduction**

1. Thank you, Mayor Boshcoff and Members of Council, for allowing us to address a matter that will have serious, long-term consequences for our community for generations to come. We represent We the Nuclear Free North, an alliance of people and groups across northern Ontario, including Environment North and Nuclear Free Thunder Bay.
2. We are asking you to pass a resolution that supports our campaign to stop the Nuclear Waste Management Organization (NWMO) from proceeding with their northwestern Ontario option for a deep geological repository for all of Canada's high level nuclear waste.
3. By the end of 2024, the NWMO will decide where it proposes to relocate more than 50,000 tonnes of used nuclear fuel waste accumulated over 60 years. By the end of the plants' operating lives, there will be more than 100,000 tonnes. The NWMO expects the site will also store nuclear waste from small modular reactors.
4. The last two potential sites for the DGR are Teeswater (South Bruce) in southwestern Ontario and the Revell site in the heart of Treaty 3 territory (about 45 km northwest of Ignace, ON, and 290 km northwest of Thunder Bay).

**Risks in Siting the DGR in Northwestern Ontario**

5. The NWMO plan involves transporting, processing, repackaging, burying, and then abandoning the waste. It will be stored in in an underground facility, 600 -700 metres deep, spanning an area of 2 kilometres by 3 kilometres, and will remain radioactive for over a

million years. Radioactive releases from this waste can be deadly, difficult to contain and extremely expensive to remediate.

6. For more than 50 years there will be highly radioactive waste transported through Thunder Bay to the site by road and or by rail on a route that passes through Thunder Bay. The transport option will mean 2-3 truckloads each day for 9 months spread over the year. Each shipment will release low levels of radiation, and a truck collision or train derailment could result in much higher releases with catastrophic consequences. There is no safe level of exposure.
7. There is a significant risk that there will be radioactive releases from the NWMO's operation, including from the processing plant at the DGR site, and from the repository itself. According to the NWMO, the Used Fuel Packaging Plant (UFPP) will have releases at the site. Liquid and solid wastes will be generated and there will be radioactive releases into the air and water from the UFPP. If all goes well, releases from the DGR will not come until later but there is no guarantee that all will go well. And once radioactive toxins enter the water course it will be too late to mitigate the adverse effects.
8. The NWMO reserves the option of initiating transport of radioactive waste to their selected site before determining if the geology of that site is appropriate, and before the DGR has received final approval.
9. There is no other deep geological repository for high-level radioactive fuel waste anywhere in the world that has been approved or brought into operation.

### **Why Should Thunder Bay City Council Speak Up on this Issue?**

10. The NWMO states in its official plan, *Implementing Adaptive Phased Management 2024-28*, that one of its Guiding Principles for Site Selection is "**Inclusiveness**" and that "the NWMO **must respond to, and address where appropriate, the views of others who are most likely to be affected by implementation, including the transportation that would be required of used nuclear fuel.** Full opportunity must be provided to surrounding communities, provincial governments, Aboriginal communities and transportation communities as a large group with a shared interest to have their questions and concerns heard and taken into account in decision-making on a preferred site." <sup>1</sup>

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<sup>1</sup><https://www.nwmo.ca/Site-selection/How-it-was-developed/Guiding-principles>

11. Thunder Bay is the municipality with the greatest population in the vicinity of the Revell Site. Thunder Bay residents would be significantly affected by the transportation of nuclear waste along our highways or railways. The NWMO has not provided our city with an opportunity to have our questions and concerns taken into account in their site selection process. Therefore, it is incumbent upon our City Council to speak up on behalf of our citizens and communicate our opposition to transporting the waste through our city and siting the DGR in our region.
12. There has been strong and vocal opposition to the NWMO proposal to build a DGR in our region from multiple sectors, including several municipalities and First Nations, as well as from thousands of local residents, over decades. Serious concerns have been raised about the NWMO proposal to foist nuclear waste onto Northwestern Ontario, in terms of harm to human health, the environmental impact, lack of candid disclosure about risks, the legitimacy of the willingness process and lack of consultation. The breadth and scope of the opposition is outlined below in paragraphs 13 – 17.
13. Several municipal councils and leaders have publicly expressed concerns about transporting and disposing nuclear waste in Northwestern Ontario and not being consulted. Mayor Boshcoff, himself, recently stated that he would ensure Thunder Bay is included in the willingness process should further interest in the Ignace site continue.<sup>2</sup> Resolutions opposing the NWMO proposal to transport and bury nuclear waste in NWO have been passed by Nipigon, Red Rock, Lavallee, Chapples, Gillies and Sioux Narrows-Nestor Falls.
14. Multiple First Nations, most notably Fort William First Nation, and Indigenous organizations such as Nishnabe Aski Nation have also publicly expressed opposition to this proposal.<sup>3</sup>
15. There have been over 75 letters to the Editor of the *Chronicle Journal* and TBnewswatch and regional publications objecting to the NWMO plan, raising concerns about transportation risks, the DGR concept and being shut out from the consultation process.
16. Thousands of people have signed petitions to Parliament opposing the NWMO proposal to build the DGR without a proper consultation process.<sup>4</sup> Another online petition has 13,243 signatures.<sup>5</sup> TBnewswatch conducted 2 separate polls in 2024. The majority of respondents were against Ignace being chosen as a nuclear waste repository.

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<sup>2</sup> TB Newswatch, March 29, 2024,

<https://www.tbnewswatch.com/local-news/mayor-expects-willingness-process-for-city-8517386>

<sup>3</sup> Fort William First Nation, Pic Mobert, Lac Seul, Grassy Narrows, Ojibway Nation of Saugeen #258 and Anishinaabeg of Kabapikotawangag Resource Council representing 5 First Nations have all passed resolutions opposing the NWMO plan, <https://wethenuclearfreenorth.ca/nuclear-waste-resolutions/>

<sup>4</sup> The most recent petition presented to Federal Parliament in May contains 3,327 signatures.

<https://www.ourcommons.ca/petitions/en/Petition/Details?Petition=e-4852>

<sup>5</sup>

[https://www.change.org/p/stop-the-disposal-of-nuclear-waste-in-northwestern-ontario?source\\_location=search](https://www.change.org/p/stop-the-disposal-of-nuclear-waste-in-northwestern-ontario?source_location=search)

17. Thunder Bay 's 1997 plebiscite resulted in 91% of the voters declaring they were against nuclear waste disposal in the Thunder Bay area. In 2000, Thunder Bay City Council adopted a resolution expressing concern with transportation of nuclear waste throughout the City and advised appropriate Federal Ministers and local MP's of this concern.

### **NWMO Site Selection Process is Unfair**

18. The NWMO has stated it will only proceed in an area with "willing and informed hosts." Willingness suggests consent is freely given. However, the power imbalance between the nuclear industry and the small, regionally isolated and economically vulnerable community of Ignace with a population of 1,200 is huge.
19. The site-selection process is not subject to regulatory oversight or legislation; it is a process made-up by NWMO. The NWMO has paid millions of dollars to municipal and Indigenous governments to engage and seek their support as part of its site selection process. This has led to accusations of governments being bought off by the nuclear industry.<sup>6</sup>
20. The NWMO's "host" community of Ignace is 45 kilometres east of the proposed DGR site and is not in the same watershed. There are smaller communities closer to the site that are not part of the NWMO's "willingness process." While the NWMO is also seeking a declaration of willingness from Wabigoon Lake Ojibway Nation, other First Nations with land use near or overlapping the project area are not being consulted.
21. Despite living along the transportation route where Thunder Bay residents will have daily exposures to gamma radiation from the transports or train cars carrying nuclear waste, our community has not been directly engaged in a consultation process. It is not fair that we have been excluded from the willingness process, not informed of the risks, nor given a say in the process.
22. To be "informed" implies that information has been provided about the risks and benefits of being a host community. However, the NWMO does not publicly address the risks or the harms associated with radioactive exposure and contamination. Being the host site for all of Canada's nuclear waste may negatively affect the community's social cohesion and its image as a gateway to pristine wilderness, and "nuclear stigma" may lower property values.
23. Moreover, the NWMO plan to transport, process and bury high-level nuclear waste is not a complete plan. It includes a number of 'concepts' which are still being developed, and there are large gaps in the information. How can the residents be "informed" about a plan that lacks concrete details and material facts?

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<sup>6</sup> David Suzuki, Science Matters, August 1, 2024, <https://david Suzuki.org/story/burying-radioactive-nuclear-waste-poses-enormous-risks/> -David Suzuki, world-renowned scientist and environmentalist, has strongly criticized the NWMO's high-risk proposal to bury and abandon nuclear waste and its site selection process which has effectively excluded communities along the transportation route and those downstream from the repository site from the 'willingness' decision.

24. Northwestern Ontario is virtually self-sufficient when it comes to electricity. We do not rely on nuclear energy from southern Ontario. From an environmental justice perspective, we should not bear the enormous risk associated with having all the waste transported through our communities and stored in our region when the nuclear power plants have been primarily for the benefit of Southern Ontario.

**Is there a better way? - Yes – Extended On-Site Stewardship**

25. WTNFN and many scientific experts believe the best option in terms of safety is to construct robust, secure storage at or near the reactor sites where the waste can be safely managed until more advanced management techniques are developed.

26. We believe an acceptable waste management system must be evaluated according to the strictest safety criteria and should have the ability to:

- Monitor the condition of the containers;
- Measure the performance of the container integrity;
- Mitigate - if there is deterioration, it should be possible to intervene, retrieve, and repackage.

27. While extended onsite storage meets these criteria, the DGR involves sealing and abandoning the site, making it impossible to measure, monitor or mitigate should problems occur.

28. We believe it is important to distinguish transporting high-level radioactive nuclear fuel waste from the medical isotopes that are already crossing our highways. There is an astronomical difference in volume, frequency of exposure and toxicity of radionuclides when contemplating transporting existing and future supplies of nuclear fuel waste.

**Conclusion:**

Rather than holding wide public consultations, the NWMO's process has been fundamentally unfair and exceedingly partial to what the industry wants. Given the long-term health and environmental risks associated with nuclear waste, we believe a broader more inclusive consultation should have taken place, one that respected the principles of free, prior and informed consent for Indigenous people and included all potentially impacted communities. We believe a proposal with the potential for this magnitude of regional impacts should not have proceeded without regional input, particularly from communities along the transportation route and downstream from the proposed site.

There has been a significant outcry from the citizens of Thunder Bay against the DGR being built near Ignace and the waste being transported through our city. We hope that you are listening and will adopt a resolution to speak up for our community and demonstrate leadership for the region.

We respectfully request that you pass a resolution:

- a) urging the NWMO to pursue the option of managing the used nuclear fuel waste closer to the reactor stations where the waste has been generated and is currently stored and thereby avoid the transportation of this radioactive waste through Thunder Bay;
- b) to oppose the locating of the DGR in Northwestern Ontario; and
- c) to communicate our concerns to the NWMO, the Minister of Energy and Natural Resources of Canada, M.P. Patty Hajdu and M.P. Marcus Powlowski.

**Revised Request for Deputation to Thunder Bay City Council**  
**July 2, 2024**

**To:** Krista Power, City Clerk  
**From:** Charles Faust and Mary Veltri

**On Behalf of:**  
We The Nuclear Free North (WTNFN)  
Nuclear Free Thunder Bay (NFTB)  
Environment North (EN)

**Background:**

1. On June 4, 2024 the Intergovernmental Affairs Committee (IGAC) formally responded to the deputations from Environment North, We the Nuclear Free North and Nuclear Free Thunder Bay requesting that Thunder Bay City Council adopt the Proximity Principle with regards to storage of all of Canada's high level radioactive nuclear fuel waste.
  2. The Committee dismissed the request on the basis that the "proximity principle did not have teeth" as there was no specific distance associated with it, and that adopting it would not achieve the desired objective of keeping nuclear waste from being transported through Thunder Bay. Committee members further stated that there would be ample opportunity to have input into the NWMO decision after a site has been selected for a deep geological repository (DGR).
  3. At the June 4th meeting, IGAC expressed concern with the inadequacy of the city's current By-law #201-97 dealing with Transportation of Dangerous Goods. The current By-law was clearly written with liquid combustibles (gasoline, diesel fuel, home heating fuel) and liquefied gas (propane) in mind. The risks and uncertainties to health and property of stalled or waylaid transports carrying highly radioactive used nuclear fuel waste are not even remotely considered in the current by-law. Although we encourage the Mayor and Council to direct City administration to examine this By-law, we strongly believe a swifter response to the threat of 50 years of nuclear fuel waste transport through Thunder Bay is needed.
  4. With due respect to the IGAC, we disagree that Thunder Bay City Council should delay its response to this very weighty issue until after the siting decision has been made.
1. The NWMO has itself stated in its official plan, *Implementing Adaptive Phased Management 2024-28*, that one of its Guiding Principles for Site Selection is "Inclusiveness" and that **"the NWMO must respond to, and address where appropriate, the views of others who are most likely to be affected by implementation, including**

This is **Exhibit "B"** referred to in the  
Affidavit of Mary Veltri  
affirmed before me over video teleconference  
this 4th day of February, 2026.  
The affiant, Mary Veltri, located in Thunder Bay,  
Ontario, and the commissioner, Jenna Brunt, located in  
Thunder Bay, Ontario.

*Jenna Brunt*  
A Commissioner, etc.

Jenna Brunt  
Law Society of Ontario #94333B  
705-471-3509

**the transportation that would be required of used nuclear fuel. Full opportunity must be provided to surrounding communities, provincial governments, Aboriginal communities and transportation communities as a large group with a shared interest to have their questions and concerns heard and taken into account in decision-making on a preferred site.”<sup>1</sup>**

5. Thunder Bay is the largest municipality with the greatest population in the vicinity of the proposed Revell Site between Ignace and Dryden. Thunder Bay residents would be significantly affected by the implementation and transportation of used nuclear fuel waste on our highways. The NWMO has not provided our city with an opportunity to have our questions and concerns taken into account in their site selection process.
6. Since the original deputation was made by Environment North and We the Nuclear Free North to Thunder Bay City Council in November 2022, multiple municipalities, First Nations and other organizations have publicly expressed their concerns about the NWMO siting process and their opposition to the NWMO proposal to site a deep geological repository in Northwestern Ontario.<sup>2</sup>
7. In May 2024, the Assembly of First Nations held a Regional Dialogue Session in Thunder Bay where First Nations were given an opportunity to express their concern about transportation of used nuclear fuel through their territories. Representatives from Treaty 3, Robinson Superior and Robinson Huron expressed strong opposition to the nuclear waste being transported through their territories.
8. There have been over 70 letters to the Editor of the *Chronicle Journal* and TBnewswatch and regional publications objecting to the NWMO proposal to transport highly radioactive used nuclear fuel waste an average distance of 1,650 kilometers to be buried in Northwestern Ontario, and to being shut out from the consultation process.
9. Thousands of people have signed petitions opposing the NWMO proposal to build a DGR without a proper consultation process. The most recent petition presented to Federal Parliament in May contains 3,327<sup>3</sup> signatures. Another online petition on Change.org opposing a deep geological repository for high-level nuclear waste in Northwestern Ontario has 13,230 signatures. A local petition to City Council in favour of the proximity principle has 481 signatures. On February 4<sup>th</sup>, 2024, TBnewswatch conducted a one-day poll in which 1,612 people or 67.34% of the respondents indicated that they were not in favour of Ignace being chosen as a nuclear waste repository.

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<sup>1</sup><https://www.nwmo.ca/Site-selection/How-it-was-developed/Guiding-principles>

<sup>2</sup> For a comprehensive list of resolutions and statements opposing the burial of nuclear waste, see <https://wethenuclearfreenorth.ca/nuclear-waste-resolutions/>

<sup>3</sup> <https://www.ourcommons.ca/petitions/en/Petition/Details?Petition=e-4852>

10. A plebiscite conducted in the 1997 Thunder Bay municipal election resulted in 91% of the respondents voting against nuclear waste disposal in the Thunder Bay area. In 2000, Thunder Bay City Council passed a resolution, moved by Mayor Ken Boshcoff, affirming “its concern with the transportation of nuclear waste throughout the City of Thunder Bay; And that the Federal Ministers of Transport and Environment, MP’s and MPP’s be advised accordingly.”

**Request for New Deputation:**

1. It is the role of Council under section 224(a) of the *Municipal Act, 2001* to represent the public and to consider the well-being and interests of the municipality. The Thunder Bay public is loudly expressing its views and interests and calling upon our City Council to convey our concerns to the NWMO and the Federal Government. It is incumbent on our City Council to act when there is an issue of such import that will significantly impact its citizens for generations to come, and will forever change the landscape of northwestern Ontario. This is even more critical when the concerns of Thunder Bay citizens have been deliberately excluded from the NWMO siting process.
2. We therefore respectfully request an opportunity to make a new deputation to the present Council requesting that Thunder Bay City Council pass a resolution:
  - a) to oppose the transportation of high-level nuclear waste throughout the City of Thunder Bay;
  - b) to oppose the locating of the DGR in Northwestern Ontario; and
  - c) to communicate the City’s opposition to the NWMO and the Federal Minister of Natural Resources.

This is **Exhibit "C"** referred to in the  
Affidavit of Mary Veltri  
affirmed before me over video teleconference  
this 4th day of February, 2026.  
The affiant, Mary Veltri, located in Thunder Bay,  
Ontario, and the commissioner, Jenna Brunt, located in  
Thunder Bay, Ontario.

*Jenna Brunt*

A Commissioner, etc.

Jenna Brunt  
Law Society of Ontario #94333B  
705-471-3509

**Assembly of First Nations**

**Final Report on 2024**

**Dialogue Sessions and Recommendations**

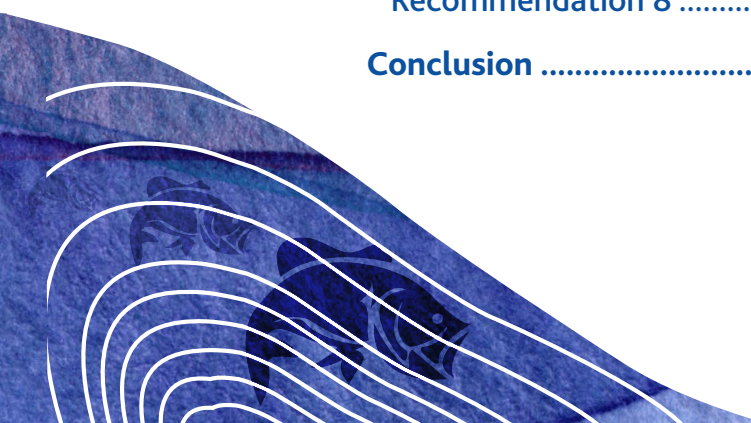
**to the Nuclear Waste Management**

**Organization (NWMO)**



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## The Assembly of First Nations

The Assembly of First Nations (AFN) is a national advocacy organization that works to advance the collective aspirations of First Nations individuals and communities across Canada on matters of national or international nature and concern. The AFN holds two Assemblies a year where mandates and directives for the organization are established through resolutions directed and supported by the First Nations-in-Assembly (elected Chiefs or proxies from member First Nations). The AFN is comprised of more than 630 member First Nations.

In addition to the direction provided by Chiefs of each member First Nation, the AFN is guided by an Executive Committee, consisting of an elected National Chief and Regional Chiefs from each province and territory. Representatives from five national councils (Knowledge Keepers, Youth, Veterans, 2SLGBTQIA+ and Women) support and guide the decisions of the Executive Committee.

The AFN supports First Nations by coordinating, facilitating, and advocating for policy change, with the leaders of this change being the First Nations themselves. Chiefs representing First Nations must be an integral part of meeting the challenge of sustainable, transformative policy change. The AFN is mandated by Resolution 52/2023, *Securing Accountability of Nuclear Technology, Waste, Transportation and Storage*, and Resolution 43/2021, *Support for First Nations Inherent Rights, Title, and Jurisdiction of Water Stewardship, including the Traditional Roles of First Nations Women*.

### Objective of the Report

In 2024, the AFN held dialogue sessions with First Nations across Turtle Island regarding the transportation and storage of used nuclear fuel. This report presents the recommendations on this critically important issue. The feedback gathered will inform the AFN's advocacy and support efforts in alignment with AFN Resolution 52/2023, *Securing Accountability for Nuclear Technology, Waste and Transportation*. It is important to note that the concerns, perspectives, and feedback received during the dialogue sessions do not represent all First Nations in Canada and are limited to those who attended the dialogue sessions. Many expressed the need for ongoing dialogue on this topic, which the AFN intends to continue into 2025 and beyond.



## Introduction

Since 2004, the AFN has established a collaborative working relationship with the Nuclear Waste Management Organization (NWMO). Within this working relationship, the AFN has committed to raising awareness about the protection, conservation, and environmental health of land, and water. Additionally, there has been a focus on the long-term management of nuclear waste by developing outreach materials and facilitating information sharing with First Nations.

The AFN first led dialogue sessions from 2004 to 2005 following the implementation of the *Nuclear Fuel Waste Act* (2002), which required the nuclear industry to recommend a preferred approach for long-term nuclear waste management in Canada. The AFN played a role in facilitating broader engagement with First Nations on the proposed options for nuclear waste management, with the dialogue sessions intended to raise awareness, build capacity for decision-making, and promote dialogue with Natural Resource Canada (NRCan). In September 2005, the AFN provided the NWMO and the Government of Canada with recommendations on nuclear waste disposal options, incorporating First Nations' concerns and feedback.

Based on these dialogue sessions, several key recommendations were made:

### 1. Inherent and Treaty Rights:

- o Emphasize the importance of respecting inherent and treaty rights throughout the nuclear waste disposal dialogue process.
- o Highlight the need for the federal government to rebuild lost trust.

### 2. Fiduciary Responsibility:

- o The federal government must fulfill its fiduciary responsibility to First Nations concerning the effects that the disposal of nuclear waste may have on inherent and treaty rights.

### 3. Consultation:

- o The federal government must conduct its own consultation with First Nations prior to taking any action.
- o Further dialogue and discussion are required at the regional and local level, and the distinct circumstances of First Nations must be reflected in any final decisions.



#### **4. Traditional Knowledge:**

- o Acknowledge that traditional knowledge (TK) should only be used with the approval of First Nation representatives.

#### **5. Capacity:**

- o The NWMO should support First Nations-driven research and provide independent resources for informed decision-making.

#### **6. Energy:**

- o The Government of Canada should promote alternative energy sources and assist First Nations in developing renewable energy.

#### **7. Low and Intermediate Waste:**

- o The NWMO must ensure a comprehensive examination of the nuclear energy chain's impact on First Nations.

#### **8. Importation of Waste:**

- o Canada should pass legislation specifically banning the importation of waste.

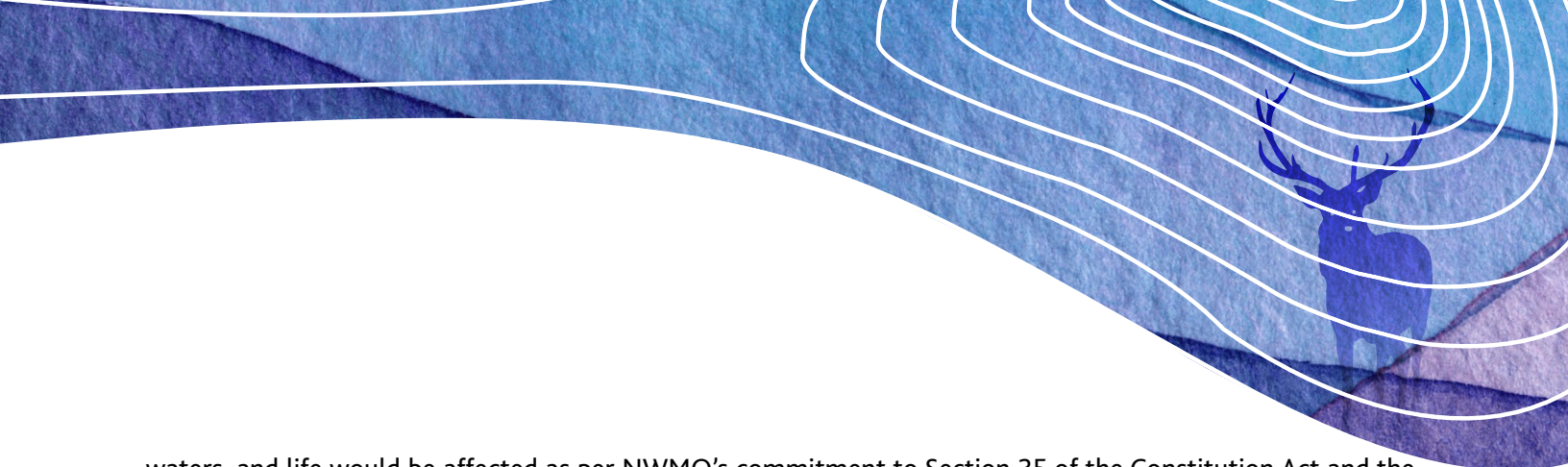
#### **9. Emergency Response:**

- o Establish plans for monitoring nuclear waste transportation, emergency response systems and necessary resources and training for First Nations.

#### **10. Time for Study:**

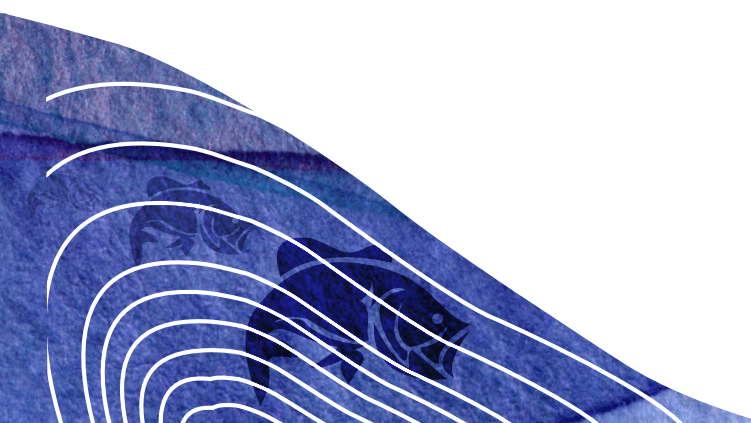
- o Provide adequate time for First Nations to study and develop positions on nuclear waste management, irrespective of imposed timelines.

In 2007, the Government of Canada selected Adaptive Phase Management (APM), as the national plan for long-term management of used nuclear fuel. This plan involves containing and isolating used nuclear fuel within a Deep Geological Repository (DGR) located in an area with suitable geology. The placement of the DGR requires an informed and willing host community—but it equally requires consent from local First Nations whose lands,



waters, and life would be affected as per NWMO's commitment to Section 35 of the Constitution Act and the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP). As part of this process, a transportation system will be developed to move the used nuclear fuel from its current interim storage facility to the newly selected site. Currently, two potential sites are under consideration for Canada's DGR: Wabigoon Lake Ojibway Nation (WLON) in the Ignace Area and Saugeen Ojibway Nation (SON) in the South Bruce area. The final site selection is anticipated by late 2024.

As a national advocacy organization, the AFN aims to ensure that First Nations are actively involved in a transparent site-selection process, providing them with the necessary information to make informed, self-determined decisions about the management and transportation of used nuclear fuel across Turtle Island. In this pursuit, the 2024 AFN-led dialogue sessions were planned and held highlighting the evolving landscape of nuclear waste management over the past two decades and underscored the critical role of First Nations in all respective decisions. Below, we outline the feedback, concerns, and priorities identified during these sessions, followed by updated recommendations to the NWMO.





## 2024 Dialogue Sessions

The dialogue sessions took place from April through June 2024 in Fredericton, New Brunswick, Toronto, Ontario, Thunder Bay, Ontario, and Vancouver, British Columbia. In addition to these in-person dialogues, the AFN facilitated a virtual meeting with the Advisory Committee on Climate Action and the Environment (ACE).

The AFN is not a rights-holder. The purposes of the 2024 dialogue sessions on the transportation and storage of used nuclear fuel were to:

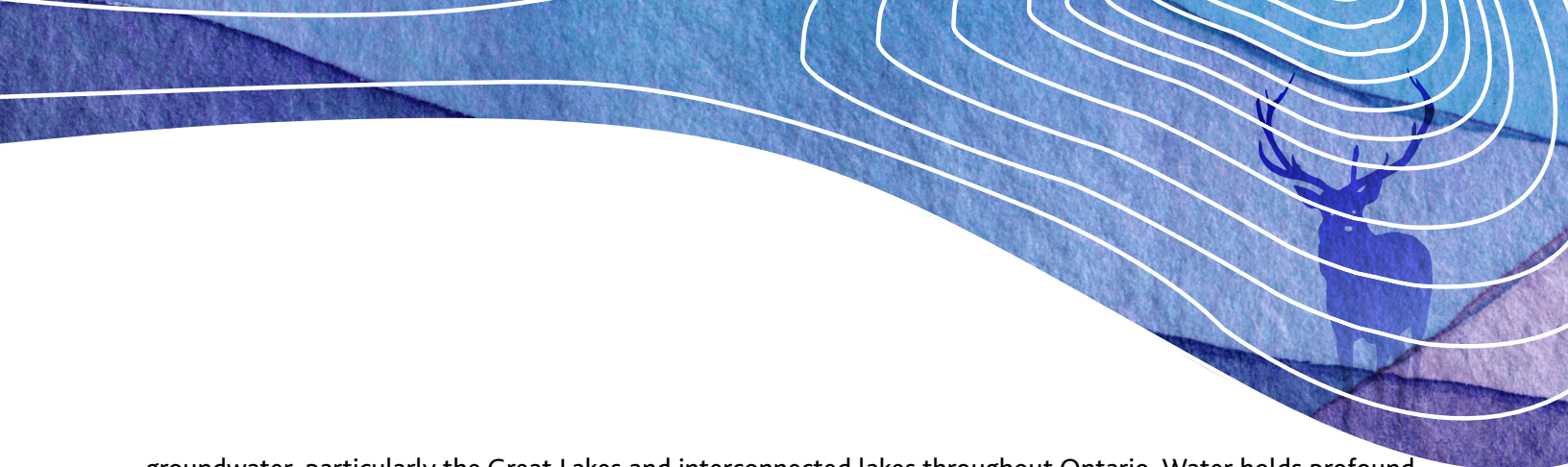
1. Raise awareness within First Nations about the site selection process and ensure that First Nations are informed about and involved in a transparent site selection process.
2. Ensure that First Nations have the necessary information to make informed decisions as it relates to the Deep Geological Repository (DGR) and used nuclear fuel transportation.
3. Listen to the priorities, concerns, and perspectives of First Nations regarding the long-term storage and transportation of used nuclear fuel.

Feedback, priorities, and concerns raised at the dialogue session were categorized into three main items: deep geological repository, transportation, and additional comments. Priorities within each category are described below:

### Deep Geological Repository

Among First Nations who attended the dialogue sessions, significant concerns were raised regarding the deep geological repository (DGR) and its impact on land, water, and air—all of which are essential to First Nations' ways of life and cultural preservation. First Nations uphold a deep-seated responsibility to and connection with Mother Earth. Guided by ancestral practices and traditional knowledge, First Nations have undertaken environmental stewardship from time immemorial—a commitment to protect the future generations of all life forms and the intricate, harmonious systems that sustain us. The DGR's potential for environmental contamination threatens the integrity of traditional sacred sites, cultural heritage, and the traditional knowledge that has been tirelessly sustained by, and is integral to, First Nations.

Significant concerns were expressed about the construction and operation of the DGR and its impact on



groundwater, particularly the Great Lakes and interconnected lakes throughout Ontario. Water holds profound cultural and spiritual significance for First Nations in Canada, symbolizing life, sustenance, and interconnectedness with the natural world. The potential contamination of these vital water sources threatens not only the environment but also the holistic well-being of First Nations.

These environmental risks are further heightened by the potential for unpredictable and unforeseen effects from natural disasters and climate change, such as earthquakes, melting permafrost, forest fires, flooding, and extreme weather events. These factors heighten concerns about the stability and long-term safety of the DGR and its potential impacts on local communities. They underscore the insufficiency of the current 70-year monitoring plan for the DGR, prompting calls for life-cycle monitoring and comprehensive safety assurances from the Canadian government. Ultimately, the introduction of nuclear waste storage on these lands raises fears of irreversible damage to ecosystems and the disruption of First Nations' ways of life for generations to come.

Consent and permission were paramount issues for First Nation participants concerning the DGR. There is a pressing need for meaningful dialogue that respects First Nations' land and water rights and jurisdiction. Many attendees felt that there has been a lack of transparency and perceived secrecy around the decision-making processes for the DGR site selection, which has undermined their trust in NWMO and the Adaptive Phase Management Plan. The absence of robust engagement and the need for clear, respectful communication are critical concerns. First Nations must be fully informed and have their permission obtained before any further action is taken, ensuring their sovereignty and rights are upheld.

Self-regulation and governance of the nuclear waste industry raised significant concerns among attendees, particularly regarding the need for independent oversight to ensure First Nations rights are respected. The NWMO is not the sole organization that will be responsible for nuclear waste. Attendees emphasized the need to have all industry, non-governmental agencies, and government bodies that are responsible, including, but not limited to, Transport Canada, Atomic Energy of Canada Limited, the Impact Assessment Agency of Canada, and the Canadian Nuclear Safety Commission, be actively involved in the planning and monitoring process. These organizations should conduct their engagements and consultations with First Nations before proceeding with any further actions. The legal and ethical implications of storing nuclear waste without First Nations' permission are profound, necessitating adherence to the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP).

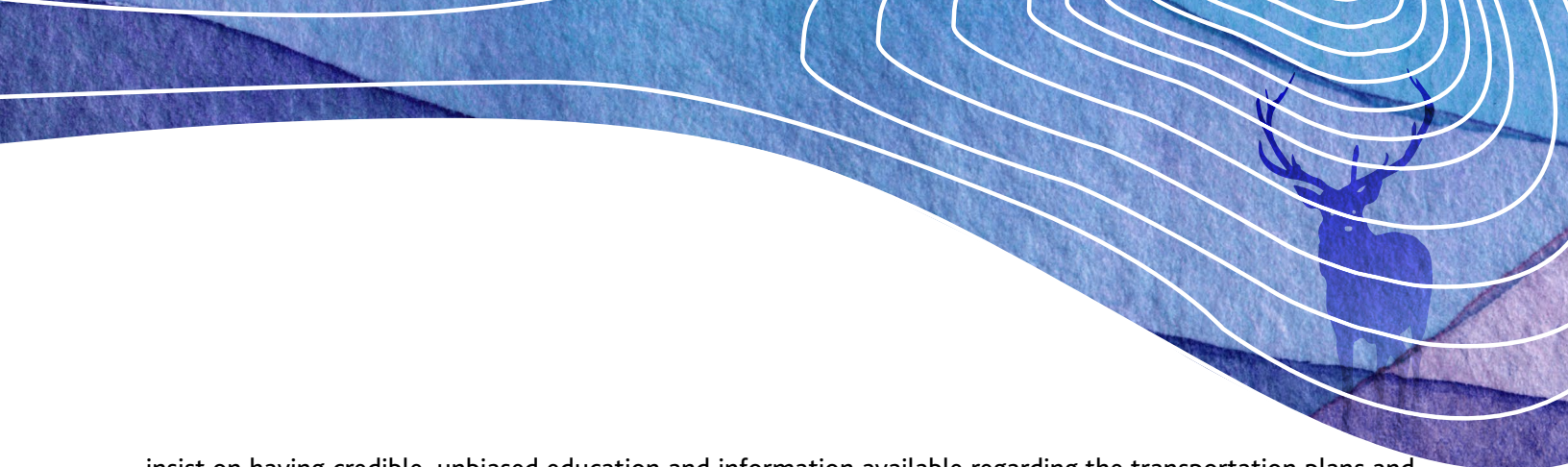


## Transportation

The transportation of nuclear waste through First Nations land in Canada has raised significant concerns about safety standards, particularly regarding current regulations, consultation requirements, and testing methods. Many dialogue participants expressed that the testing of transportation packages is outdated, relying heavily on scale models and simulations from decades past. This has prompted calls for updated legislation and more comprehensive regulations that require thorough consultation and engagement with all affected communities along the transportation routes. The AFN has conducted independent research on the number of First Nations who are along and in proximity to prospective transportation routes from the interim storage facilities to both Wabigoon-Ignace and Saugeen Ojibway-South Bruce areas. While this research is considered preliminary due to the confidentiality of exact route systems, the findings estimate that at least 210 First Nations communities could be affected by the transportation of nuclear waste through Canadian railways and primary highways. This research does not yet consider other important factors such as watershed systems and alternative means of transportation, like the potential utilization of non-primary highways; however, it does indicate the impact scope of this APM transportation plan on First Nations. These and any additionally affected communities must be informed about the hazardous waste potentially passing through their areas, understand the associated risks, and be fully prepared to manage any accidents or emergencies that may arise. Modernizing safety standards is essential to ensure the protection of their lands, waters, and people.

Accidents and emergency response plans are also a major concern for dialogue session attendees. The potential for spills and other accidents along remote highways and railways raises fears about the robustness of existing emergency plans and the possible impacts on First Nations, their homelands, sensitive areas, and waters. Many attendees voiced their concerns about the preparedness and effectiveness of current response measures, should an incident occur. They emphasize the need for robust, well-communicated, specific, and practiced emergency response strategies that account for the unique challenges and vulnerabilities of their lands; and that such strategies should be established before a site is selected for the proposed DGR and subsequent transportation routes.

A further significant issue raised regarding the transportation process is the lack of transparency and trust between the First Nations dialogue participants and authorities, such as the NWMO and the Canadian Nuclear Safety Commission (CNSC). Many attendees feel there is a substantial gap in transparent and consistent information sharing from these bodies, leading to deep-seated mistrust. To build trust, First Nations participants



insist on having credible, unbiased education and information available regarding the transportation plans and their potential impacts. This includes providing information on all potential future transportation routes for intermediate and high-level waste.

Community engagement and respect for First Nation rights are crucial aspects that many attendees felt were inadequately addressed in the current transportation plans. There is a strong call for meaningful consultation that respects unceded lands and incorporates First Nation voices and rights into decision-making processes and overall transportation plans. Among the First Nation participants in the dialogue sessions, many stressed the importance of nation-to-nation conversations, highlighting that shipping nuclear waste from one region to another without proper dialogue breaches protocols and fails to honour their sovereignty. They advocated for a First Nations-led dialogue to ensure that their concerns and rights are prioritized in any transportation plan involving their lands.

## Additional Considerations

First Nations participants expressed significant concerns about the transportation and storage of used nuclear fuel in Canada, emphasizing a range of perspectives. One critical issue is the distribution of benefits. While both northern and southern Ontario benefit from nuclear power, the southern regions—where nuclear energy production primarily occurs—receive a disproportionately larger share of these benefits. In contrast, northern regions bear the risks associated with the storage and transportation of nuclear waste but receive far less in return. This imbalance is viewed as unfair and unjust, exacerbating existing disparities and prompting calls for a more equitable distribution of both benefits and risks.

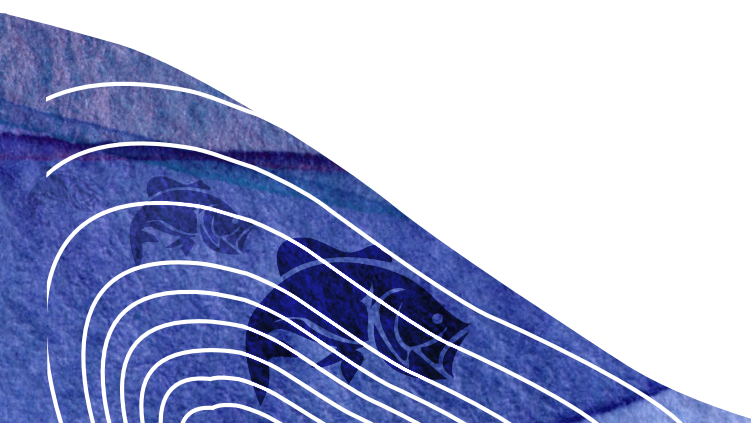
Another crucial concern is the economic viability of nuclear waste projects, including but not limited to the Deep Geological Repository. Participants have pointed out the lack of clear financial information regarding the costs associated with the storage, transportation, and infrastructure required for managing nuclear waste. Additionally, there are questions about the financial sustainability of such a large-scale project, particularly in light of unknown risks. Participants are particularly worried about whether sufficient resources will be available for all communities to ensure safety and sustainability over the centuries that the nuclear waste remains hazardous. Transparency in financial planning and guarantees of long-term funding are essential to addressing these concerns.

The long-term impact of a deep geological repository on First Nations is another critical issue, encompassing significant environmental, social and economic concerns. Attendees highlighted the need to think in terms of



generations, considering who will govern and operate these facilities and how their safety and sustainability will be ensured over time. First Nations worldviews promote the consideration of future generations in every decision and action – it is the understanding that our time on Earth inevitably has rippling effects on all lifeforms for generations to come; and so, it is our responsibility to make rational and cautious choices that ensures wellbeing far beyond our lifetime. Regarding the NWMO’s plan, participants urged that it should involve assessing the current health and resilience of communities, ensuring they are robust enough to manage such developments on their lands. Additionally, many attendees advocate for exploring alternative energy options, emphasizing renewable energy sources and conservation strategies as opposed to an increased reliance on nuclear energy – and thus, producing more waste for our future generations to shoulder. Attendees argue that nuclear energy, often marked as a clean alternative, carries significant environmental and safety risks, and is frequently greenwashed to obscure its true ecological impact and potential hazards. They call for a broader conversation on energy planning that includes the potential role of small modular reactors (SMRs) and their waste management, as well as addressing potential global proliferation issues and the risk of Canada becoming a dumping ground for other countries’ nuclear waste.

While attendees have expressed concerns about the NWMO’s proposed plan, they also emphasized the urgent need for a comprehensive strategy to manage the significant amounts of nuclear waste currently stored at interim facilities near major water bodies. The necessity for immediate action is evident due to the potential risks posed to these vital water bodies. It is imperative that we address this issue now, rather than leaving it to future generations. Participants pointed out that rejecting the current proposal does not eliminate the presence of nuclear waste on Turtle Island. Instead, it underscores the need for collaboration to find a viable solution. Any proposed actions must be well-informed and deliberate. Attendees stress that the dialogue surrounding this issue is only beginning, not concluding. They call for extensive engagement and consultation to ensure that all perspectives, particularly those of First Nations, are meaningfully considered. Decisions must be based on informed consent and a comprehensive understanding of the implications, rather than being driven by fear or incomplete information.





## Recommendations

### Recommendation 1

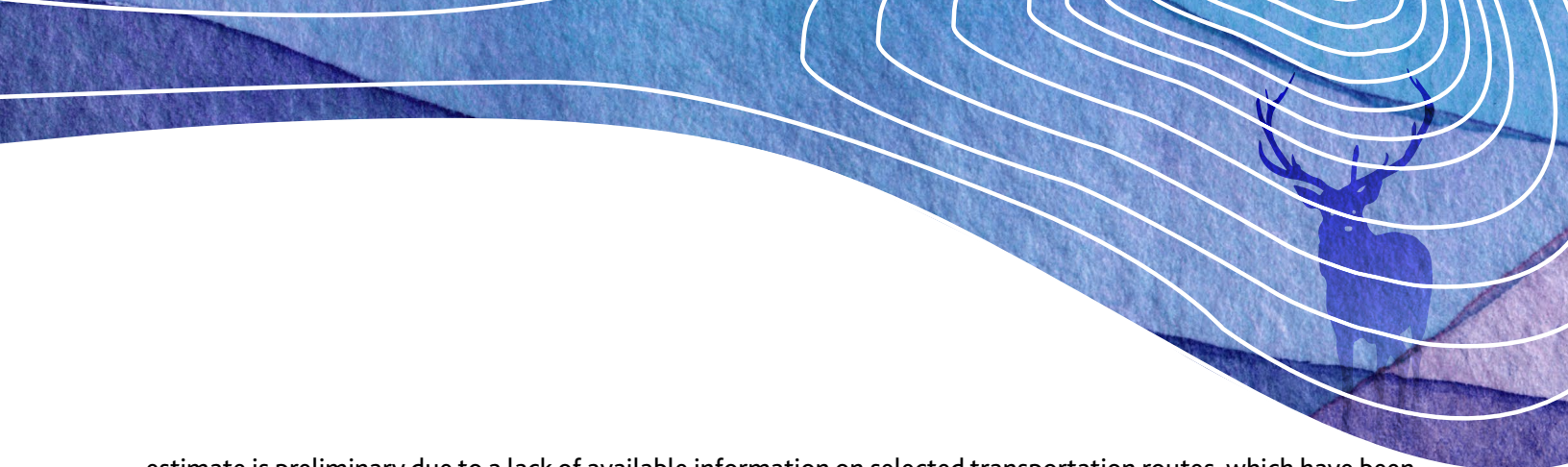
*The AFN respectfully urges that comprehensive and meaningful dialogue, consultation, and engagement be undertaken with all affected First Nations throughout the site selection process, and before any critical decisions are made regarding the Deep Geological Repository or transportation routes. It is essential that the perspectives of all First Nations who rely on the same watershed as the proposed site, as well as those along the transportation route, be respected and fully integrated, in a manner that honors their inherent right to self-determination. This approach will ensure a more inclusive and equitable process for all.*

The dialogue sessions underscored a critical need for meaningful engagement and a deep respect for First Nation land rights and jurisdiction, including the necessity of obtaining permissions from First Nations communities. Concerns were raised by participants regarding perceived secrecy in decision-making processes and a lack of transparency in communication with all affected communities. As a result, it is essential to enhance dialogue to ensure that all communities are thoroughly informed about the DGR and transportation plans.

Obtaining Free, Prior, and Informed Consent (FPIC) from all impacted First Nations is imperative. FPIC is not only vital for upholding First Nation rights and sovereignty but also for building trust, securing long-term cooperation, and preventing potential conflicts. Without FPIC, any decisions regarding the repository would lack legitimacy and could result in significant social, environmental, and legal challenges.

First Nations' inherent sovereignty means that each Nation has the right to make independent decisions about the use of their lands and resources, free from external pressure or imposed timelines. Upholding First Nation self-determination in the site selection process means ensuring that all affected Nations have the autonomy to decide how to proceed based on their own values, priorities and governance. This is particularly critical for those who share the same watershed, whose rights and responsibilities extend beyond geographic proximity to the DGR site. Furthermore, meaningful engagement is crucial—respecting unceded lands and incorporating First Nation voices and rights into the transportation decision-making process before selecting a site must be at the forefront.

The transportation of nuclear waste is projected to affect at least 210 First Nations communities through grade-level crossings and provincial highways that traverse their lands, depending on the site that is selected. This



estimate is preliminary due to a lack of available information on selected transportation routes, which have been labeled as classified within governmental agencies. Such secrecy has refused First Nations a complete understanding of their foreseeable risks and challenges their legally entrenched rights. First Nations must be granted sufficient time and information to study the issue and develop informed positions, irrespective of timelines imposed by the NWMO or other industry and governmental bodies. Additional dialogue and discussion at regional and local levels are necessary to ensure fully informed consent. Any final decisions must consider the unique circumstances of First Nations.


## Recommendation 2

***The AFN strongly urges that robust First Nations-led emergency response plans and communication systems be developed and implemented prior to site selection and the transportation of nuclear waste through First Nations lands. This includes comprehensive source water protection measures for First Nations.***

The construction and operation of a DGR entails significant geological and hydrological disturbances. Without proper safeguards, there is a risk of long-term environmental degradation, including the contamination of rivers, lakes, and aquifers that supply drinking water.

While non-First Nations communities benefit from protocols enforced under *The Clean Water Act, 2007*, following biological and chemical contamination events such as emergency spill response plans, these measures fall short of protecting First Nations. This leaves communities at an increased risk of contaminated freshwater sources and little to no accountability from responsible government and/or industrial parties. Establishing stringent First Nation-led water protection protocols can mitigate these risks and establish policies that address significant source and drinking water threats, ensuring the long-term sustainability of water resources for future generations. Transporting nuclear waste through First Nation lands that do not have such measures in place could lead to severe and irreparable damage to their water resources. This not only threatens the health and well-being of these communities but also undermines their rights and sovereignty. It is imperative to develop and enforce robust protection measures that are led by First Nations, ensuring their voices are central in decision-making processes that impact their lands and waters.

Furthermore, appropriate and timely communication following any accident on First Nation lands is essential. The NWMO has underscored the safety of transportation containers and the adherence to regulatory standards for transportation. Nevertheless, it is imperative that First Nations communities are adequately equipped and




thoroughly prepared to manage emergencies, irrespective of their likelihood. The remoteness of some communities may hinder quick responses, making the development of an emergency response communication system for First Nations critical. This system should ensure that all accidents are reported and addressed immediately, without delay, and provide up-to-date notification details. It should also facilitate nation-to-nation conversations, enabling communities to communicate effectively with one another after any incident and to efficiently implement emergency response protocols.

### Recommendation 3

*The AFN recommends the Nuclear Waste Management Organization include Public Health oversight in the Deep Geological Repository and Transportation planning process, both nationally and provincially, including First Nation Health Authorities.*

Nuclear waste and the establishment of a deep geological repository (DGR) alongside transportation pose significant potential risks to human health. Radioactive materials contained in nuclear waste emit ionizing radiation, which can cause severe health issues including cancer, genetic mutations, and other serious illnesses. If not properly contained, these radioactive substances can contaminate soil, water sources, and air, leading to long-term environmental and human health consequences. The construction and operation of a DGR involves handling and transporting these hazardous materials, increasing the risk of accidental releases or leaks, which can be human, climate, or technical. For example, mistakes in repository operation, maintenance, and oversight can lead to dangerous breaches. This can include improper handling of nuclear waste, inadequate training of personnel, or lapses in following stringent safety protocols. Administrative oversights, such as insufficient regulatory supervision or ineffective communication of safety procedures, can also contribute to accidental releases. Additionally, intentional acts of sabotage or unauthorized access by individuals pose a substantial threat to the integrity of the repository, potentially causing radioactive materials to escape into the environment.

Technological failures present another critical avenue for accidental spills and or leaks from the DGR. The deterioration or malfunction of containment systems, such as the corrosion or breach of waste containers, can result in the release of radioactive substances. Failures in critical infrastructure, including ventilation, monitoring, and alarm systems, can prevent the timely detection and mitigation of leaks. Technological issues may also arise from the degradation of engineered barriers over time due to unforeseen geological interactions or material fatigue.



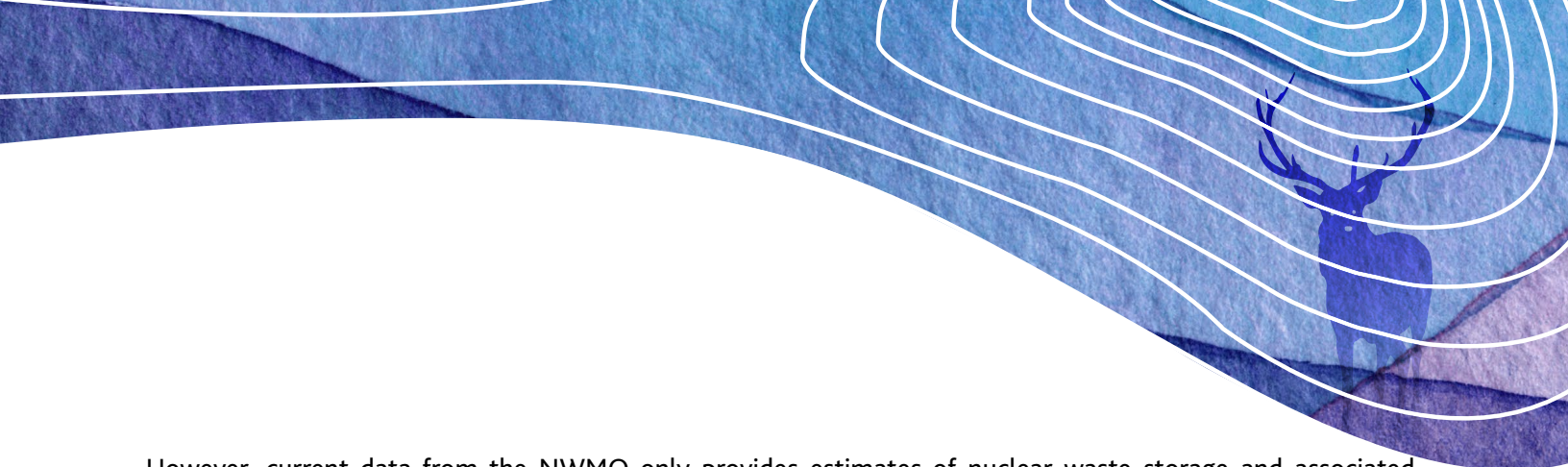
Climate-related events are another potential cause of accidents at a DGR. Natural disasters such as earthquakes, floods, or extreme weather can compromise the structural integrity of the repository. Seismic activity might cause fractures in the bedrock or damage engineered barriers, facilitating the escape of radioactive materials. Flooding, particularly in the context of climate change, can infiltrate the repository, spreading contaminants into groundwater and surrounding ecosystems. Extreme weather events, such as intense storms or wildfires, can disrupt surface facilities and access routes, hindering emergency response efforts and increasing the potential for accidents, spills and/or leaks. These climate-related risks necessitate comprehensive planning and adaptive strategies to ensure the DGR's long-term resilience and safety amidst evolving environmental conditions.

Meticulous planning, stringent safety protocols, and continuous monitoring are imperative to prevent adverse health outcomes for both current and future generations. The incorporation of public health oversight is essential in the NWMO's plan for a Deep Geological Repository (DGR) due to the potential long-term human health risks associated with nuclear waste from multiple possible avenues and sources. Integrating public health experts into the planning and operational stages will ensure that all potential health impacts are comprehensively evaluated and effectively mitigated. Integrating First Nations Health Authorities ensures the health challenges and vulnerabilities of First Nations specifically, especially those in remote regions with limited access to public health services, are equally prioritized in risk mitigation and management procedures.

## Recommendation 4

***The AFN strongly urges that prior to selecting a site, the NWMO create and publish a comprehensive document outlining nuclear waste storage and transportation projections over the next 70 years to better inform the public of the potential long-term implications of hosting a Deep Geological Repository and future transportation routes.***

Among First Nations who attended the dialogue sessions, many voiced concerns regarding the growing emphasis on Small Modular Reactors (SMRs) and the extensive reliance on nuclear energy across Turtle Island. Their primary worries center on the anticipated rise in nuclear waste generation and its impact on future generations. As the nuclear industry expands to meet increasing energy demands, particularly through the development of SMRs, it is crucial to consider these implications.



However, current data from the NWMO only provides estimates of nuclear waste storage and associated transportation based on present conditions. It does not offer projections for future increases or potential expansions into other provinces and First Nation lands. Additionally, participants noted that nuclear waste will continue to be generated well beyond NWMO's proposed 70-year monitoring plan for the DGR, thus a 70-year projection for nuclear waste storage and transportation may underscore the inefficiency and inadequacy of the proposed monitoring period as production will likely outpace the assumed plans for storing and monitoring the waste (see Recommendation 5). Offering detailed projections for nuclear waste storage and transportation of both intermediate and high-level waste would enhance transparency, ensuring that the public is well-informed about the long-term implications of hosting a DGR and the consequent increase in transportation routes.

## Recommendation 5

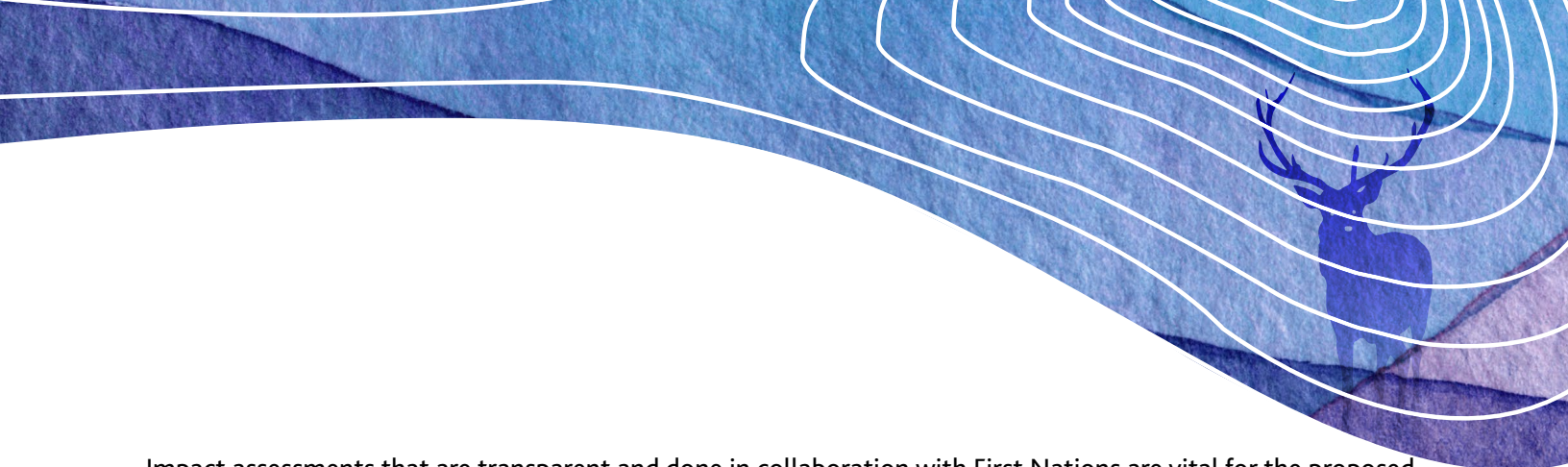
*The AFN strongly urges that the NWMO reassess and extend their proposed monitoring program for the DGR and clearly indicate what entity will be responsible for the waste following the closure of the DGR.*

Building on Recommendation 4, dialogue session attendees have expressed that the NWMO's 70-year monitoring plan is inadequate. The willing host community will have to contend with the waste indefinitely, and the post-closure monitoring phase must reflect that. Therefore, enhanced safety assurances and comprehensive life-cycle monitoring from either the NWMO and/or the Canadian Government are essential. Additionally, there must be a clear and transparent delineation of responsibility for the waste and for addressing any emergencies or accidents following "decommissioning and closure."

This includes developing a comprehensive plan and timeline for remediation activities in the event of any on-site accidents. Additionally, recognizing that the NWMO is not the sole organization involved in nuclear waste management, storage, and transportation, it is recommended that other responsible entities—such as Transport Canada, Atomic Energy of Canada Limited, the Impact Assessment Agency of Canada, and the Canadian Nuclear Safety Commission—be actively involved in the planning and monitoring process. These organizations should conduct their own engagement and consultation with First Nations before proceeding with any further actions.

## Recommendation 6

*The AFN strongly urges the NWMO to work with the Government of Canada to support First Nations-led Impact Assessments, ensuring that evaluations of likely economic, social, cultural, and environmental impacts are created and conducted with First Nations.*




Impact assessments that are transparent and done in collaboration with First Nations are vital for the proposed DGR and transportation plan, as they ensure that First Nations perspectives, knowledge, and rights are integral to the decision-making process. First Nations possess a profound connection to their land and water, encompassing an intricate understanding of local ecosystems and the potential impacts of large-scale projects. Their traditional knowledge offers unique insights into environmental stewardship and sustainability, which is essential when evaluating the long-term consequences of storing nuclear waste. By leading these impact assessments, First Nations can ensure their cultural values and ecological expertise are respected and incorporated, resulting in a more comprehensive and culturally relevant evaluation of the DGR project.


Furthermore, conducting impact assessments alongside First Nations is fundamental for upholding the principles of reconciliation and adhering to the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), which emphasizes the importance of free, prior, and informed consent. Collaborative assessments empower First Nations to actively engage in decision-making processes that directly affect their lands and communities. This collaborative framework promotes trust and transparency among First Nations, governmental entities, and the NWMO. By recognizing and respecting the sovereignty and governance structures of First Nations, these impact assessments can foster equitable and sustainable development, ensuring the DGR project does not undermine the well-being and rights of First Nations communities. First Nations must have the capacity to conduct and lead these assessments if they wish, with timelines established by the communities themselves and significant investments accompanying any agreements. This approach not only empowers the communities but also enhances the quality, relevance, and transparency of the assessments conducted.

## Recommendation 7

***The AFN strongly urges the NWMO to support and participate in a national First Nations engagement on nuclear energy, storage, and transportation.***

First Nation participants have underscored the necessity for more dialogue concerning nuclear waste storage and transportation, especially with an incorporation of diverse perspectives. As opposed to solely having brief, intimate sessions between First Nations and a particular stakeholder, a larger-scale dialogue can ensure that collaborative and viable solutions are achieved. Participants have emphasized the importance of including more stakeholders beyond the NWMO in these discussions. Consequently, we recommend establishing a national, multi-day engagement involving a wide array of experts from industry, government, non-governmental organizations, and First Nations. Furthermore, it is advisable that this engagement occur on an annual or semiannual basis to keep First Nations communities and leadership well-informed and up-to-date on matters





related to nuclear waste management, storage, and transportation across Turtle Island. This engagement should be structured to facilitate open discussions, comprehensively address concerns, and build mutual trust. By incorporating diverse voices and expertise, we can work towards equitable, transparent, and considerate solutions for all affected parties. In doing so, the NWMO can follow through on its reconciliation ambitions by respecting First Nations sovereignty and rights to be fully involved during every step of this project which deeply affects First Nation lands, people, and ways of life.

## Recommendation 8

*The AFN strongly urges the NWMO to publish a transparent document outlining alternative methods for nuclear waste storage that were considered, along with detailed information and evidence explaining why each alternative method was ruled out.*

Many participants have expressed interest in understanding the alternative methods for managing Canada's used nuclear fuel and why a DGR is considered the safest option. It is further recommended that the NWMO, in collaboration with the Impact Assessment Agency of Canada and relevant First Nations communities, conduct a strategic assessment of the DGR as a means for disposing of nuclear waste and that any Impact Assessment fairly, and unbiasedly considers alternatives to the project and alternative means of conducting the project.



## Conclusion

First Nations have articulated significant concerns regarding the Deep Geological Repository (DGR) project in Ontario, emphasizing the potential risks to land, water, and air. The potential for environmental contamination, particularly affecting sacred sites and essential water sources such as the Great Lakes, poses substantial threats to their spiritual practices, traditional knowledge, and ways of life. These concerns are further exacerbated by the potential impacts of natural disasters and climate change, which highlight the perceived inadequacy of the proposed 70-year monitoring plan. This underscores the urgent need for comprehensive, long-term life-cycle monitoring and robust safety assurances from the Government of Canada to prevent irreversible damage and disruption to First Nation lands, lives, and water—today and for generations to come. As a national advocacy organization, the AFN is not a rights-holder and instead focuses its advocacy on safeguarding First Nations' free, prior, and informed consent and their active, early, and informed involvement in decisions about used nuclear fuel, management, and transportation across their lands and waters.

In addressing these concerns, adherence to the principles of duty to consult, Free, Prior, and Informed Consent (FPIC), and reconciliation is imperative. Article 29(2) of the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP) specifically mandates that no storage or disposal of hazardous material shall take place in the lands or territories of Indigenous peoples without their free, prior and informed consent. Therefore, First Nations must be meaningfully engaged and consulted throughout the planning and implementation stages of the DGR and Transportation plan to ensure their sovereignty and rights are respected. Transparent, inclusive engagement, coupled with thorough impact assessments done in collaboration with First Nations, is essential for addressing these issues equitably and effectively, ensuring that First Nation perspectives are fully integrated into decision-making processes.

The path to a responsible nuclear waste management strategy lies in adopting the recommendations put forth by First Nations and their related advocacy organizations. This approach will ensure that First Nations' invaluable knowledge and indisputable rights guide every aspect of this complex, long-term process. By prioritizing collaboration and respecting the deep connections that First Nations have with their lands, this plan can pave the way for a more equitable and environmentally conscious approach to managing nuclear waste—one that honours both the present and future needs of all communities involved.



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[www.afn.ca](http://www.afn.ca)

Mary Veltri  
118 McComber Cres.  
Thunder Bay, On P7A 7E8

February 20, 2024

Dear Mayor Boshcoff and Thunder Bay City Councillors,

I am writing to urge Thunder Bay City Council to take a vocal stand against the Nuclear Waste Management Organization's (NWMO's) proposal to transport all of Canada's stockpile of high level radioactive nuclear waste through our community to be buried in the Revell Lake site, near Wabigoon Lake Ojibway Nation between Dryden and Ignace. In doing so you would be reaffirming the Thunder Bay plebiscite result of 1997 opposing nuclear waste being buried in the Thunder Bay area and Council's resolution in 2000 expressing concern with transportation of nuclear waste through our city. As you are undoubtedly aware, the waste we are talking about can remain radioactive for thousands of years and short periods of direct exposure can be fatal.

There is considerable resistance to the NWMO's Deep Geological Repository (DGR) proposal in Northeastern Ontario and Northwestern Ontario among communities along the route. Many First Nations, including Fort William First Nation, Saugeen First Nation and Ojibways of Onigaming First Nation have expressed their opposition to transporting and burying nuclear waste in Northwestern Ontario. The DGR model for long term storage of nuclear waste has not yet been implemented anywhere in the world. Many of NWMO's claims about the safety of their proposal have not actually been tested but are simply based on mathematical models. There are many concerns about the possibility of the storage materials eroding over time and the waste leaking into the soil and water table, potentially contaminating the surrounding areas and harming human and wild life populations long into the future. Leading experts in the field of nuclear safety, such as Dr. Gordon Edwards and Dr. Gordon Johnson, have recommended that the waste be stored close to the sites where it is created in Hardened On Site Storage structures that can be replaced as they age. In this way, the radioactive waste can be continually monitored and accessed if a safer disposal method is developed in the future.

Currently, the majority of Canada's nuclear waste is being produced and stored in Southern Ontario which relies heavily on nuclear energy for their electricity needs. By contrast, Northwestern Ontario produces enough clean electricity to meet its energy needs without reliance on nuclear power. Our electricity comes from hydro, biomass, solar and wind. It is not fair that we in Northwestern Ontario should bear the responsibility and suffer the long-term consequences of having to store the nuclear industry's toxic waste from Southern Ontario forever. This violates a fundamental principle of climate justice.

The NWMO is supposed to establish willingness on the part of communities impacted by the DGR proposal. They have not, however, engaged in dialogue with the citizens of Thunder Bay about the transportation issue to ascertain our "willingness". Clearly, communities such as ours that are situated along the transportation route would be significantly impacted by the cumulative exposure to radiation from the trucks carrying the waste as they pass through our city twice a day for 50 years. The risk could potentially be catastrophic if there was an accident. In addition, the constant movement of highly radioactive nuclear waste over a thousand kilometers by road or by rail would be extremely vulnerable to potential attack should there be a war or act of terrorism.

Thunder Bay Council's Intergovernmental Affairs Committee has now heard from three separate groups who are opposing the siting of the DGR in Revell Lake. The Chair of the Committee, Kristin Oliver, has tried to focus very narrowly on the proximity principle which she says is ambiguous and therefore has little weight. City Council is not limited to endorsing the proximity principle; numerous reasons have been presented to council that should cause alarm about the proposal to locate the DGR at Revell Lake. Council has the power to express opposition to the transportation and burial of nuclear waste in Northwestern Ontario for multiple reasons, including the flawed process that the NWMO has adopted by ignoring the views of communities along the transportation route. Councillor Oliver has also suggested in the press that Thunder Bay's opposition to the NWMO proposal would not matter to the decision-making process as this matter falls within the jurisdiction of the Federal Government. However, the NWMO and the government have stated on numerous occasions that social acceptability and willingness are essential components to going ahead with the DGR proposal. I would suggest that City Council has a responsibility to communicate our concerns to the Federal Government and convey the lack of social acceptance in our community to this proposal. In a recent poll on this issue conducted by TBNewsWatch for one day, 2394 people participated. 67% of the respondents said they were opposed to nuclear waste being buried in Ignace. The majority of folks in our community are clearly not willing. I urge you to speak up on this issue for the health and welfare of Thunder Bay residents and on behalf of future generations.

Thanks for your attention to this very important matter.

This is Exhibit "D" referred to in the  
Affidavit of Mary Veltri  
affirmed before me over video teleconference  
this 4th day of February, 2026.  
The affiant, Mary Veltri, located in Thunder Bay,  
Ontario, and the commissioner, Jenna Brunt, located in  
Thunder Bay, Ontario.

*Jenna Brunt*

A Commissioner, etc.

Jenna Brunt  
Law Society of Ontario #94333B  
705.471.3509

Yours truly,

Mary Veltri

C.C. Patty Hajdu, Minister of indigenous Services, M.P. Thunder Bay-Superior North  
Lise Vaugeois, M.P.P. Thunder Bay- Superior North



Hon. Marcus Powloski,  
Member of Parliament for Thunder Bay-Rainy River  
3B-905 Victoria Avenue East  
Thunder Bay, Ontario  
P7C 1B3

January 11, 2026

Dear Dr. Powlowski:

Re: Concerns about NWMO's Impact Assessment Initial Project Description

We are writing on behalf of three organizations based in Thunder Bay and a coalition organization to which we all belong. As you may be aware, you that the Impact Assessment for the Nuclear Waste Management Organization's proposed DGR has commenced. The initial project description (IPD) was posted on the Impact Assessment Agency's public registry on January 5, 2026. The IPD sets out the general scope of the assessment including the project's core elements, purpose, location and activities. There is now an opportunity for the public to comment on whether the IPD adequately identifies all the concerns that matter to the affected communities. The deadline to respond is February 4, 2026.

As we feared, the NWMO has excluded the transportation of high-level nuclear waste from their project description. This is very troubling, as the transportation component of the project has been the most important concern for residents in your riding as well as in other communities and First Nations in northwestern Ontario and along the transportation route more generally.

You may recall that during the site selection process, we persistently voiced our specific concerns about the risk of transporting nuclear waste over such a long distance for such a long duration. This issue was raised at public meetings and rallies, in petitions to Parliament and to the Ontario Legislature and in deputations to municipal councils. Even though our community is directly impacted by the NWMO plan, we were not consulted and our objections were ignored in the site selection decision. While our objections were not considered in the siting process, it was our understanding that we would have an opportunity to have our concerns addressed in the Impact Assessment. Now that the NWMO plan is at this stage, they are still trying to ignore our concerns by suggesting that the impact of transporting this unprecedented volume of high-level radioactive

waste over such a long distance need not be assessed by the Impact Assessment Agency. Transportation is clearly an integral part of the NWMO plan and has been featured in their Adaptive Phased Management plan for 20 years. It is unconscionable that they should try to leave out their proposed transportation plan from the impact assessment.

We are writing to request that you participate in the impact assessment process to ensure that the concerns of your constituents regarding the risks and hazards associated with transportation of nuclear waste are adequately addressed. We are also asking that you amplify our voice by conveying our concerns to the Minister of Energy and Natural Resources and the Minister of the Environment and Sustainability. Public input is an essential component of impact assessments in Canada. We would like assurance that our input is not being unreasonably limited by narrowly scoping the assessment to exclude the NWMO's transportation plan.

Please let us know whether you will speak up on this matter by adding your comments to the public registry and relaying our concerns to Minister Hodgson and Minister Dabrusin. For your convenience, here is the link to the Impact Assessment Agency's public registry: <https://iaac-aeic.gc.ca/050/evaluations/proj/88774?culture=en-CA>. You can also find more information about the review process and resources to support public participation at <https://wethenuclearfreenorth.ca/impacts/>.

We thank you for your attention to this matter and are hopeful that you will take action on behalf of your constituents.

**Yours truly,**

Mary Veltri, Environment North

Wendy O'Connor, Nuclear Free Thunder Bay

Diane Swiatlowski, We the Nuclear Free North

Paul Berger, Citizens United for a Sustainable Planet

cc. The Honourable Tim Hodgson, Minister of Energy and Natural Resources

The Honourable Julie Dabrusin, Minister of the Environment and Climate Change



Lise Vaugeois  
MPP Thunder Bay-Superior North  
272 Park Ave.  
Thunder Bay, ON P7B 1C5.

January 15, 2026

Dear Lise:

Re: Concerns about NWMO's Impact Assessment Initial Project Description

We are writing on behalf of three organizations based in Thunder Bay and a coalition organization to which we all belong. As you may be aware, the Impact Assessment for the Nuclear Waste Management Organization's proposed DGR has commenced. The initial project description (IPD) was posted on the Impact Assessment Agency's public registry on January 5, 2026. The IPD sets out the general scope of the assessment including the project's core elements, purpose, location and activities. There is now an opportunity for the public to comment on whether the IPD adequately identifies all the concerns that matter to the affected communities. The deadline to respond is February 4, 2026.

As we feared, the NWMO has excluded the transportation of high-level radioactive nuclear waste from their project description. This is very troubling, as the transportation component of the project has been the most important concern for residents in your riding as well as in other communities and First Nations in northwestern Ontario and along the transportation route more generally.

You may recall that during the site selection process, we persistently voiced our specific concerns about the risk of transporting nuclear waste over such a long distance for such a long duration. This issue was raised at public meetings and rallies, in petitions to Parliament and to the Ontario Legislature and in deputations to municipal councils. Even though our community is directly impacted by the NWMO plan, we were not consulted and our objections were ignored in the site selection decision. While our objections were not considered in the siting process, it was our understanding that we would have an opportunity to have our concerns addressed in the Impact Assessment. Now that the NWMO plan is at this stage, they are still trying to ignore our concerns by suggesting that the impact of transporting this unprecedented volume of high-level radioactive waste over such a long distance need not be assessed by the Impact Assessment Agency. Transportation is clearly an integral part of the NWMO plan and has been featured in their Adaptive Phased Management plan for 20 years. It is unconscionable that they should try to leave out their proposed transportation plan from the impact assessment.

We are writing to request that you participate in the impact assessment process to ensure that the concerns of your constituents regarding the risks and hazards associated with transportation of nuclear waste are adequately addressed. We are also asking that you amplify our voice by conveying our concerns to the Federal Minister of Energy and Natural Resources and Federal Minister of the Environment and Sustainability. Public input is an essential component of impact assessments in Canada. We would like assurance that our input is not being unreasonably limited by narrowly scoping the assessment to exclude the NWMO's transportation plan.

Please let us know whether you will speak up on this matter by adding your comments to the public registry and relaying our concerns to Minister Hodgson and Minister Dabrusin. For your convenience, here is the link to the Impact Assessment Agency's public registry: <https://iaac-aeic.gc.ca/050/evaluations/proj/88774?culture=en-CA>. You can also find more information about the review process and resources to support public participation at <https://wethenuclearfreenorth.ca/impacts/>.

We thank you for your attention to this matter and are hopeful that you will take action on behalf of your constituents.

**Yours truly,**

Mary Veltri, Environment North

Wendy O'Connor, Nuclear Free Thunder Bay

Diane Swiatlowski, We the Nuclear Free North

Paul Berger, Citizens United for a Sustainable Planet



Environment North  
PO Box 10307  
Thunder Bay, On P7B 6TB

Chief Wilfred King  
Kiashke Zaaging Anishinaabek - Gull Bay First Nation  
General Delivery, Gull Bay, ON P0T 2J0

January 26, 2026

Dear Chief King,

As you may recall, I am on the Board of Environment North and have been actively involved in the campaign to oppose the NWMO's plan to transport, bury and abandon high-level radioactive nuclear waste in Northwestern Ontario. You may be aware that the Impact Assessment for the proposed DGR in the Wabigoon Lake Ojibway Nation-Ignace area is now underway with a 30-day time limit to respond to the initial project description ending February 4, 2026.

Environment North and We the Nuclear Free North will be posting comments on the Impact Assessment registry in response to the Initial Project Description. We are very concerned about the NWMO's attempt to exclude transportation issues from the project description. By leaving out transportation from the impact assessment, the nuclear industry wants to remove radioactive exposure from the transport containers, accident risks, routing decisions, and emergency preparedness from public review and planning – denying hundreds of communities along potential transportation corridors any meaningful opportunity to understand or weigh in on the risks they may face.

We are also concerned that the NWMO has failed to meet its obligations to consult with and obtain consent from all the impacted First Nations as they are required under the United Nations Declaration on the Rights of Indigenous Peoples and Canadian law.

I am writing to encourage you to participate in the Impact Assessment to voice your concerns if you have not already done so. Someone has posted the ***“Assembly of First Nations Final Report on the 2024 Dialogue Sessions and Recommendations to the Nuclear Waste Management Organization (NWMO)”*** on the Impact Assessment Registry. The AFN’s concerns and recommendations would likely be strengthened if individual First Nations also posted comments. You can read a Summary of the AFN report and recommendations [here](#).

You can review the NWMO’s initial project description titled “Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project” on the Impact Assessment Agency of Canada’s website [here](#). You can submit your comments on the Impact Assessment Registry [here](#).

Finally, you may be interested in an upcoming webinar sponsored by We the Nuclear Free North on January 28<sup>th</sup> at 7 pm EST. You can [register here](#) for the webinar ***“Now or Never: Preparing Comments for the Impact Assessment of NWMO’s Nuclear Waste Project”***.

Thanks for your attention to this.

Sincerely,

Mary Veltri, Board Secretary  
on behalf of  
Environment North



Environment North  
PO Box 10307  
Thunder Bay, On P7B 6TB

Mr. Paul Greenwood, CAO  
Shuniah Municipality  
420 Leslie Avenue  
Thunder Bay, ON P7A 1X8

January 26, 2026

Dear Mr. Greenwood,

As you may be aware the Impact Assessment Agency of Canada is now conducting its review of the Nuclear Waste Management Organization's (NWMO's) nuclear waste project. The NWMO is proposing to transport all of Canada's high-level nuclear fuel waste from nuclear reactor sites in southern Ontario, Quebec and New Brunswick for processing, burial and eventual abandonment at a site between Ignace and Dryden.

The initial project description (IPD) is now available for public viewing and comment on the Impact Assessment Registry. The IPD sets out the general scope of the assessment including the project's core elements, purpose, location and activities. The public is invited to comment on whether the IPD adequately identifies all the concerns that matter to the affected communities. Unfortunately, **the NWMO has explicitly stated that they do not intend to include transportation of the nuclear waste in the impact assessment.** This is very troubling, as the transportation component of the project has been a major concern for many communities and First Nations along the north shore of Lake Superior. It is worth noting that transportation has been included in the NWMO project description as an integral part of implementing their plan for more than 20 years. Many municipalities along the transportation corridor who were not included in the NWMO consultation process expected that their safety plan would be subject to the rigorous standards of review upheld by Canada's Impact Assessment Agency.

We are writing to ascertain whether the Municipality of Shuniah will be participating in the impact assessment process to ensure that the concerns that many residents have been voicing for several years regarding the risks and hazards associated with transportation of nuclear waste are adequately addressed. As a municipality located along the route where the nuclear fuel waste will be transported for a minimum of 50 years, on a twice daily basis, Shuniah will be subjected to a significant risk of radioactive exposure with serious consequences to the environment and human health. This is particularly worrisome as highway accidents involving transport trucks in Northwestern Ontario are occurring at an ever-increasing rate, according to MTO statistics. In addition, the casks carrying the nuclear fuel waste will be vulnerable to sabotage and terrorist attack. These risks directly affect the residents of Shuniah. A comprehensive impact assessment should require that all of the transportation risks are adequately addressed and measures taken to mitigate the harm.

Municipalities play a key role in impact assessments in addressing issues relating to emergency response planning and the project's impact on the health and safety of the community and the environment. For these reasons, we urge your municipality to participate in the NWMO Impact Assessment by posting your comments on the Registry. We would hope that you would protect the interests of your residents to ensure that the impact of transporting the waste from the nuclear reactor sites where the waste is currently stored to the proposed disposal site is included in the impact assessment. As the impact assessment process unfolds, you would then have an opportunity to ask questions and raise concerns about all matters affecting your town and its residents including the adequacy of the transport containers and the emergency measures that are in place when there are radioactive releases into the environment.

You can review the NWMO's initial project description on the Impact Assessment Agency of Canada's website [here](#). You can submit your comments on the Impact Assessment Registry [here](#),

I thank you for your attention to this matter and remain.

Yours truly,

Mary Veltri, Board Secretary  
on behalf of  
Environment North

---

**AFFIDAVIT OF DORIS LEGASSICK**

---

I, **DORIS LEGASSICK**, of the Municipality of Oliver Paipoonge in the Thunder Bay District in the Province of Ontario, **MAKE OATH AND SAY**:

1. My legal name is Doris LeGassick. I am commonly known as “Dodie” to everyone, including the Nuclear Waste Management Organization (“**NWMO**”). I currently serve as the Nuclear Lead for Environment North, an environmental organization based in Thunder Bay.
2. I make this affidavit to share my background, my experience in public education and advocacy related to nuclear issues, and my concerns regarding the NWMO’s Initial Project Description (“**IPD**”) for the proposed Deep Geological Repository (“**DGR**”) for Canada’s used nuclear fuel.

**I. BACKGROUND INFORMATION**

3. I currently live in Oliver Paipoonge, Ontario, and have lived in Northwestern Ontario since approximately 1977. I chose to remain in this region and raise my family here in part because it was not associated with nuclear development. Over the decades, this region has become my home.
4. I am a retired secondary school teacher. I taught for many years in Thunder Bay, including at Westgate Collegiate Institute, where I primarily taught English and, earlier in my career, geography.

5. I am now 75 years old, and I remain actively engaged in public issues affecting my community and the broader region. As I have grown older, I have become increasingly mindful of how long-term environmental decisions made today may affect future generations.

## II. MY EXPERIENCE IN NUCLEAR-RELATED ADVOCACY

6. My interest in nuclear waste issues dates back to the late 1970s, when I became aware of proposals to locate nuclear waste in the Atikokan area of Northwestern Ontario. At that time, while teaching geography, I experienced direct institutional pushback in response to classroom discussions of nuclear issues. During this period, representatives of government and industry were permitted and are still permitted to present exclusively pro-nuclear perspectives in schools.
7. These early experiences left a lasting impression on me and shaped my understanding of how information about nuclear projects is presented to the public.
8. My direct involvement in nuclear-related advocacy with Environment North began around 2010. At this time, I learned that the Town of Ignace had agreed to participate in the NWMO's site selection process for a DGR. This development marked a turning point for me, where I began actively engaging in public education and advocating related to nuclear waste management:
  - a. I have helped organize and participated in rallies, and delivered multiple public presentations at libraries, community centres, and other public venues (including in Toronto and Ottawa), and I regularly engage with members of the public through information tables at community events, including summer markets. A copy of a representative media is attached as **Exhibit 'A'**.

- b. I have participated in media engagements, including interviews with newspapers, radio, and television, to explain concerns about nuclear waste and transportation.
  - c. I have drafted various letters to the editors, municipal councils (including the City of Thunder Bay and the Conmee Township council), and Members of Parliament. Copies of representative materials are attached collectively as **Exhibit 'B'**.
  - d. I have drafted postcards, media releases, newspaper articles, collected thousands of petition signatures, and made formal deputations to the city of Thunder Bay, and surrounding municipalities, including Dryden and Ignace, raising concerns about transportation risks and the **proximity principle**. Copies of representative materials are attached collectively as **Exhibit 'C'**.
  - e. I have travelled to communities involved in the DGR process, including Ignace and Dryden, and I have visited the Revell Lake area many times.
9. Through these activities, I have engaged directly with members of the public, local decision-makers, NWMO representatives, and communities participating in the DGR process. My views regarding the proposed DGR are informed by my long-standing involvement and experience in public education and anti-nuclear advocacy.

### **III. MY CONCERNS REGARDING THE PROPOSED DEEP GEOLOGICAL REPOSITORY**

#### **A. The Transportation of Used Nuclear Fuel**

10. The proposed DGR matters to me primarily because of the transportation risks associated with the movement of 5.9 million used nuclear fuel bundles.

11. For more than a decade, I have reviewed collision statistics obtained from the Ontario Ministry of Transportation from Pickering to Ignace and extending westward toward Manitoba, as a case study. My review included total collisions as well as transport truck collisions. Based on this work, I observed that the stretch of highway between Nipigon and Ignace consistently appears as the third most dangerous area for transport truck collisions in Ontario. A copy of highway collision statistics from my review is attached as **Exhibit 'D'**.
12. In Northwestern Ontario, serious collisions frequently result in extended highway closures, sometimes lasting many hours, which heightens the concerns associated with emergency response, access, and public safety. I am concerned about the consequences of a transportation accident involving used nuclear fuel bundles, including train derailments or transport truck collisions, particularly where there are communities and high-density populations and/or remote regions where access to emergency response resources may be limited or non-existent.
13. I am also concerned about the container testing for the transportation of used nuclear fuel bundles. Based on my review of the publicly available information, I understand that much of the testing is out-dated from the 1980s and that the tests were based on one-seventh and one-half-scale models or computer modelling rather than full-scale testing. There has also been no crash testing of the Used Fuel Transportation Packages and Dry Storage Containers.
14. I am concerned that the public may assume that modern, full-scale testing and crash testing has been conducted in Canada, when this is not the case.

**B. The Site-Selection Process and the “Informed and Willing Host”**

15. I am concerned about the socio-economic context in which potential host communities are asked to make decisions about the DGR.
16. Based on my observations, communities that were participating in the siting process were all facing economic challenges, including aging populations and limited employment opportunities. In this context, the introduction of significant financial incentives can carry considerable weight and raise ethical concerns. I am concerned that, when communities are under economic pressure, financial incentives may influence community decision-making in ways that make it more difficult to fully consider the long-term risks and impacts associated with hosting a project of this nature.
17. I am also concerned about environmental justice issues. In particular, I question why the long-term risks associated with the nuclear waste would be concentrated in regions that did not proportionately benefit from nuclear power generation.
18. In addition, I am concerned that the public seems unaware of how private insurance and compensation would not provide coverage in the event of an accident involving the used nuclear fuel bundles.

**C. The Importance of Meaningful Public Participation**

19. Meaningful public participation in the context of large-scale, long-term projects, particularly involving nuclear waste, matters to me.

20. In my experience, meaningful participation involves open, accessible public meetings where people can hear information, ask questions, and compare differing perspectives. Based on my experience, the approach taken by the NWMO does not reflect these principles.
21. I invited NWMO representatives to participate in public forums where different perspectives could be presented side by side, but they declined. I am concerned when participation with NWMO is encouraged through incentives or gifts rather than through transparent, balanced information sharing.
22. In my view, the public should be able to hear both supportive and critical perspectives and decide for themselves. Based on my experience, I do not believe the current process ensures that communities are fully informed to enable truly independent decision-making.

#### **IV. CLOSING**

23. Based on my experience and long-term involvement in nuclear issues, I believe the proposed DGR raises serious and unethical concerns that warrant a comprehensive and transparent assessment, including full consideration of transportation risks, public participation, and intergenerational impacts.
24. I make this affidavit in support of meaningful public scrutiny of the proposed DGR and for no improper purpose.

AFFIRMED remotely by video conference by **Doris LeGassick** of the Municipality of Oliver Paipoonge in the Thunder Bay District of the Province of Ontario, before me at the City of Thunder Bay in the Thunder Bay District in

the Province of Ontario on February 4, 2026 in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely.

Jenna Brunt

Jenna Brunt, LSO #94333B

Doris "Dodie" LeGassick

Doris "Dodie" LeGassick

# Concerns with NWMO's Proposal to Transport Nuclear Fuel Waste to a Deep Geological Repository in NW Ontario

by **Dodie LeGassick**  
**Nuclear Lead for Environment North**

Oliver Road Community Centre  
November 2, 2023



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We the Nuclear Free North



This is **Exhibit "A"** referred to in the

Affidavit of Doris LeGassick

affirmed before me over video teleconference

this 4th day of February, 2026.

The affiant, Doris LeGassick, located in Thunder Bay,  
Ontario, and the commissioner, Jenna Brunt, located in

Thunder Bay, Ontario.

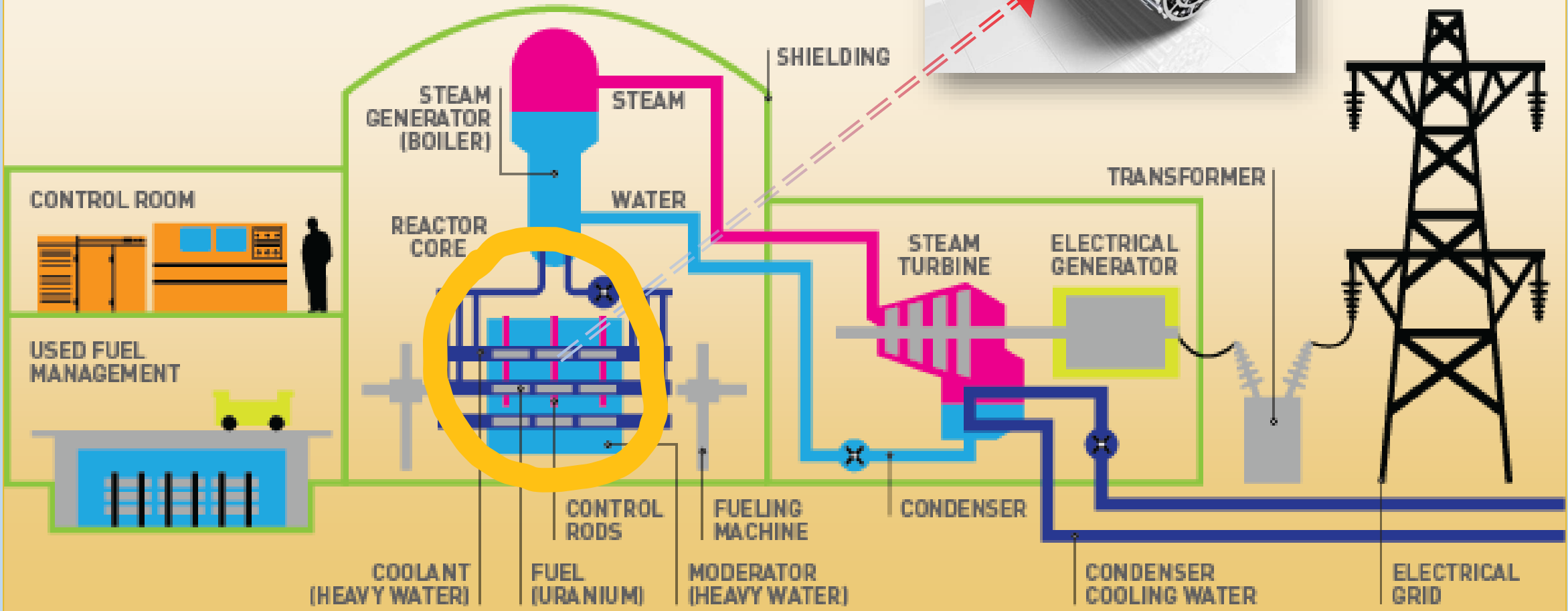
*Jenna Brunt*

A Commissioner, etc.

Jenna Brunt  
Law Society of Ontario #94333B  
705-471-3509

# What is to be transported?

## CANDU REACTOR SCHEMATIC



# Used Nuclear Fuel Pellet Characteristics

**Pellets do not come out of the reactor the same way they went in.**

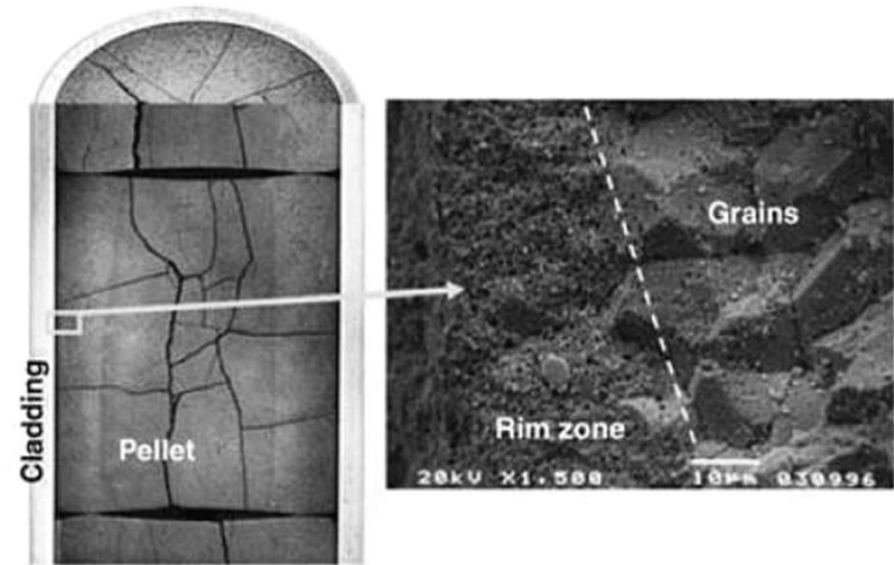
“The pellet undergoes transformations in the reactor due to the effects of external radiation and fission reactions.”

“At microscopic scale, the pellet is embrittled at the grain boundaries by the accumulation of pressurized fission gas bubbles and metallic precipitates, and restructured zones of high porosity appear at the periphery of the pellet.”

“At macroscopic scale, the pellet is fragmented into about ten to fifteen pieces.”

The following changes occur in the physical state of the spent fuel pellet on removal from the reactor:

- At macroscopic scale, the pellet is fragmented into about ten to fifteen pieces (Fig. 14.8).







14.8. State of the fuel pellet and fuel microstructure after irradiation in the reactor (spent  $\text{UO}_2$  fuel, burnup: 60 GWd/t).

# A List of 211 Selected Radionuclides in Irradiated Nuclear Fuel

Standard Chemical Symbol	Common Name of element	Atomic Mass Number	F.P. Fission Product	F.I.A.P. Activation Product	Z.A.P. Activation Product	Actinide (includes progeny)
H (T)	⚠ Hydrogen (Tritium)	3	YYY	Y	Y	
Be	Beryllium	10		Y	Y	
C	Carbon	14		YYY	YYY	
Si	Silicon	32		Y	Y	
P	Phosphorus	32		Y	Y	
S	Sulphur	35		Y		
Cl	Chlorine	36		Y		
Ar	Argon	39		Y	Y	
Ar	Argon	42		Y	Y	
K	Potassium	40		Y		
K	Potassium	42			Y	
Ca	Calcium	41		Y		
Ca	Calcium	45			Y	
Sc	Scandium	46		Y		
Standard Chemical Symbol	Common Name of element	Atomic Mass Number	F.P. Fission Product	F.I.A.P. Activation Product	Z.A.P. Activation Product	Actinide (includes progeny)
V	Vanadium	50			Y	
Mn	Manganese	54		Y	YYY	
Fe	Iron	55		YYY	YYY	
Fe	Iron	59			Y	
Co	Cobalt	58		Y	Y	
Co	Cobalt	60		YYY	YYY	
Ni	Nickel	59		Y	YYY	
Ni	Nickel	63		YYY	YYY	
Zn	Zinc	65		Y	Y	
Se	Selenium	79	YYY			
Kr	Krypton	81	Y			
Kr	Krypton	85	YYY			
Rb	Rubidium	87	Y			
Sr	Strontium	89	Y		Y	
Sr	⚠ Strontium	90	YYY	Y	Y	
Y	Yttrium	90	YYY	Y	Y	

<b>Y</b>	Yttrium	91	¥		¥	
<b>Zr</b>	Zirconium	93	¥¥¥	¥	¥¥¥	
<b>Zr</b>	Zirconium	95	¥	¥	¥	
<b>Standard Chemical Symbol</b>	<b>Common Name of element</b>	<b>Atomic Mass Number</b>	<b>F.P. Fission Product</b>	<b>F.I.A.P. Activation Product</b>	<b>Z.A.P. Activation Product</b>	<b>Actinide (includes progeny)</b>
<b>Nb</b>	Niobium	92			¥	
<b>Nb</b>	Niobium	93m	¥¥¥	¥	¥¥¥	
<b>Nb</b>	Niobium	94	¥	¥	¥¥¥	
<b>Nb</b>	Niobium	95	¥	¥	¥	
<b>Nb</b>	Niobium	95m	¥		¥	
<b>Mo</b>	Molybdenum	93		¥	¥	
<b>Tc</b>	Technetium	99	¥¥¥	¥	¥	
<b>Ru</b>	Ruthenium	103	¥			
<b>Ru</b>	Ruthenium	106	¥¥¥			
<b>Rh</b>	Rhodium	103m	¥			
<b>Rh</b>	Rhodium	106	¥¥¥			
<b>Pd</b>	Palladium	107	¥¥¥			
<b>Ag</b>	Silver	108	¥	¥	¥	
<b>Ag</b>	Silver	108m	¥	¥¥¥	¥	
<b>Ag</b>	Silver	109m	¥	¥	¥	
<b>Ag</b>	Silver	110	¥	¥	¥	
<b>Ag</b>	Silver	110m	¥	¥	¥	
<b>Cd</b>	Cadmium	109	¥	¥	¥	
<b>Cd</b>	Cadmium	113	¥		¥	
<b>Cd</b>	Cadmium	113m	¥¥¥		¥	
<b>Cd</b>	Cadmium	115	¥			
<b>Standard Chemical Symbol</b>	<b>Common Name of element</b>	<b>Atomic Mass Number</b>	<b>F.P. Fission Product</b>	<b>F.I.A.P. Activation Product</b>	<b>Z.A.P. Activation Product</b>	<b>Actinide (includes progeny)</b>
<b>In</b>	Indium	113m			¥	
<b>In</b>	Indium	114	¥	¥	¥	
<b>In</b>	Indium	114m			¥	
<b>In</b>	Indium	115			¥	
<b>Sn</b>	Tin	113			¥	
<b>Sn</b>	Tin	117m	¥	¥	¥	
<b>Sn</b>	Tin	119m	¥¥¥		¥¥¥	
<b>Sn</b>	Tin	121m	¥		¥¥¥	
<b>Sn</b>	Tin	123	¥		¥	

Sn	Tin	125	YYY		Y	
Sn	Tin	126				
Sb	Antimony	124	Y		Y	
Sb	Antimony	125	YYY		YYY	
Sb	Antimony	126	Y		Y	
Sb	Antimony	126m	YYY			
Te	Tellurium	123	Y		Y	
Te	Tellurium	123m	Y		Y	
Te	Tellurium	125m	YYY		YYY	
Te	Tellurium	127	Y		Y	
Te	Tellurium	127m	Y		Y	
I	 Iodine	129	Y		Y	
Standard Chemical Symbol	Common Name of element	Atomic Mass Number	F.P. Fission Product	F.I.A.P. Activation Product	Z.A.P. Activation Product	Actinide (includes progeny)
Cs	 Cesium	134	Y			
Cs	 Cesium	135	YYY			
Cs	 Cesium	137	YYY			
Ba	Barium	137m	YYY			
La	Lanthanum	138	Y			
Ce	Cerium	142	Y			
Ce	Cerium	144	YYY			
Pr	Praseodymium	144	YYY			
Pr	Praseodymium	144m	YYY			
Nd	Neodymium	144	Y			
Pm	Promethium	147	YYY			
Sm	Samarium	147	Y			
Sm	Samarium	148	Y	Y		
Sm	Samarium	149	Y			
Sm	Samarium	151	YYY			
Eu	Europium	152	YYY	Y		
Eu	Europium	154	YYY	Y		
Eu	Europium	155	YYY	Y		
Standard Chemical Symbol	Common Name of element	Atomic Mass Number	F.P. Fission Product	F.I.A.P. Activation Product	Z.A.P. Activation Product	Actinide (includes progeny)
Gd	Gadolinium	152	Y	Y		
Gd	Gadolinium	153	Y	Y		
Tb	Terbium	157		Y		

Tb	Terbium	160		¥		
Dy	Dysprosium	159		¥		
Ho	Holmium	166m	¥	¥		
Tm	Thulium	170		¥		
Tm	Thulium	171		¥		
Lu	Lutetium	176			¥	
Lu	Lutetium	176			¥	
Lu	Lutetium	176			¥	
Hf	Hafnium	175			¥	
Hf	Hafnium	181			¥	
Hf	Hafnium	182			¥	
Ta	Tantalum	180			¥	
Ta	Tantalum	182			¥	
Standard Chemical Symbol	Common Name of element	Atomic Mass Number	F.P. Fission Product	F.I.A.P. Activation Product	Z.A.P. Activation Product	Actinide (includes progeny)
W	Tungsten	181			¥	
W	Tungsten	185			¥	
W	Tungsten	188			¥	
Re	Rhenium	187			¥	
Re	Rhenium	188			¥	
Os	Osmium	194			¥	
Ir	Iridium	192			¥	
Ir	Iridium	192m			¥	
Ir	Iridium	194			¥	
Ir	Iridium	194m			¥	
Pt	Platinum	193			¥	
Tl	Thallium	206			¥	
Tl	Thallium	207				¥
Tl	Thallium	208				¥
Tl	Thallium	209				¥
Pb	Lead	204			¥	
Pb	Lead	205			¥	
Pb	Lead	209				¥
Pb	Lead	210				¥
Pb	Lead	211				¥
Pb	Lead	212				¥
Pb	Lead	214				¥
Standard	Common Name of	Atomic Mass	F.P.	F.I.A.P.	Z.A.P.	Actinide

Chemical Symbol	element	Number	Fission Product	Activation Product	Activation Product	(includes progeny)
Bi	Bismuth	208			☒	
Bi	Bismuth	210			☒	☒
Bi	Bismuth	210m				☒
Bi	Bismuth	211				☒
Bi	Bismuth	212				☒
Bi	Bismuth	213				☒
Bi	Bismuth	214				☒
Po	Polonium	210			☒	☒
Po	Polonium	211				☒
Po	Polonium	212				☒
Po	Polonium	213				☒
Po	Polonium	214				☒
Po	Polonium	215				☒
Po	Polonium	216				☒
Po	Polonium	218				☒
At	Astatine	217				☒
Standard Chemical Symbol	Common Name of element	Atomic Mass Number	F.P. Fission Product	F.I.A.P. Activation Product	Z.A.P. Activation Product	Actinide (includes progeny)
Rn	Radon	219				☒
Rn	Radon	220				☒
Rn	Radon	222				☒
Fr	Francium	221				☒
Fr	Francium	221				☒
Ra	Radium	223				☒
Ra	Radium	224				☒
Ra	Radium	225				☒
Ra	⚠ Radium	226				☒
Ra	Radium	228				☒
Ac	Actinium	225				☒
Ac	Actinium	227				☒
Ac	Actinium	228				☒
Th	Thorium	227				☒
Th	Thorium	228				☒
Th	Thorium	229				☒
Th	Thorium	230				☒
Th	Thorium	231				☒
Th	Thorium	232				☒

Th	Thorium	234				YYY
Standard Chemical Symbol	Common Name of element	Atomic Mass Number	F.P. Fission Product	F.I.A.P. Activation Product	Z.A.P. Activation Product	Actinide (includes progeny)
Pa	Protactinium	231				Y
Pa	Protactinium	233				YYY
Pa	Protactinium	234				Y
Pa	Protactinium	234m				YYY
U	Uranium	232				Y
U	Uranium	233				Y
U	Uranium	234				YYY
U	⚠ Uranium	235				Y
U	Uranium	236				YYY
U	Uranium	237				YYY
U	Uranium	238				YYY
U	Uranium	240				Y
Np	Neptunium	237				YYY
Np	Neptunium	238				Y
Np	Neptunium	239				YYY
Np	Neptunium	240				Y
Np	Neptunium	240m				Y
Pu	Plutonium	236				Y
Pu	Plutonium	238				YYY
Pu	⚠ Plutonium	239				YYY
Pu	Plutonium	240				YYY
Pu	Plutonium	241				YYY
Pu	Plutonium	242				YYY
Pu	Plutonium	243				Y
Pu	Plutonium	244				Y
Standard Chemical Symbol	Common Name of element	Atomic Mass Number	F.P. Fission Product	F.I.A.P. Activation Product	Z.A.P. Activation Product	Actinide (includes progeny)
Am	Americium	241				YYY
Am	Americium	242				YYY
Am	Americium	242m				YYY
Am	Americium	243				YYY
Am	Americium	245				Y
Cm	Curium	242				YYY
Cm	Curium	243				YYY

Cm	Curium	244				¥¥¥
Cm	Curium	245				¥
Cm	Curium	246				¥
Cm	Curium	247				¥
Cm	Curium	248				¥
Cm	Curium	250				¥
Bk	Berkelium	249				¥
Bk	Berkelium	250				¥
Cf	Californium	249				¥
Cf	Californium	250				¥
Cf	Californium	251				¥
Cf	Californium	252				¥
Standard Chemical Symbol	Common Name of element	Atomic Mass Number	F.P. Fission Product	F.I.A.P. Activation Product	Z.A.P. Activation Product	Actinide (includes progeny)

¥ indicates that the radionuclide is present in the designated category  
 ¥¥¥ indicates an activity level of more than a million becquerels per kilogram

This list of 211 radionuclides  
 contained in irradiated nuclear fuel  
 is by no means complete. (AECL)

# Canada's Interim Storage Sites for Used Nuclear Fuel Waste

Concern: these sites are up to 2,540 kms from the proposed DGR – much too far for safe transport



# PROXIMITY PRINCIPLE

The **Proximity Principle** directs that waste should be managed as close to the point of generation as is technically feasible. The Proximity Principle has been embedded in the European Community's Strategy for Waste Management since the 1990s.

*We asked the City of Thunder Bay Council to request the Province of Ontario Legislature to adopt the Proximity Principle.*

# MAJOR CONCERN

Quote from NWMO's: "Progress Through Collaboration - Triennial Report 2014-2016", pg. 43

"Provision for optional temporary shallow storage at the central site if needed.\*"

\*Temporary shallow storage at the deep geological repository is optional and not currently included in the Nuclear Waste Management Organization's implementation plan.

If this provision, which continues to appear in **NWMO** documentation, is implemented, it may allow for **shallow storage** of high-level nuclear waste at the central site before the DGR is even constructed.

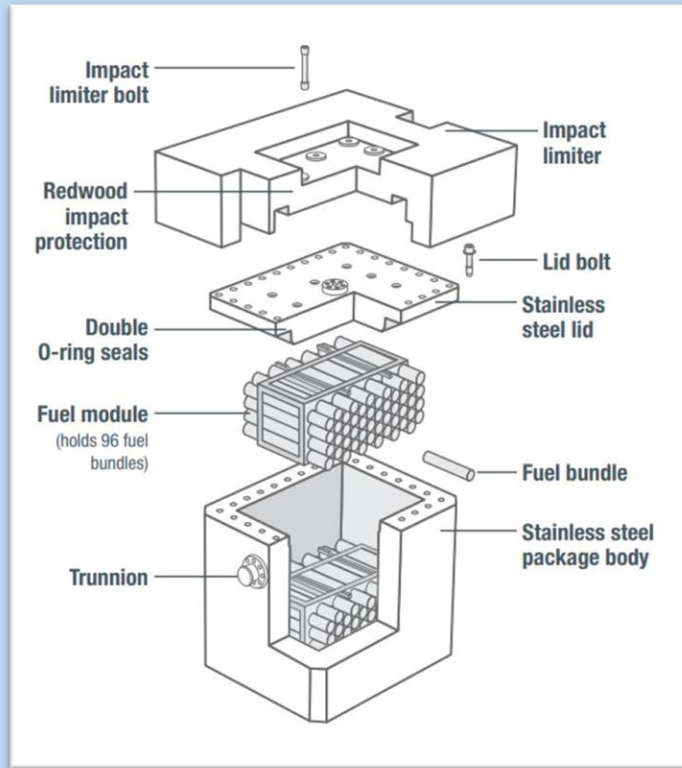
**Truck Proposed for the Transport of BTPs and UFTP (UFTP depicted without weather cover)**



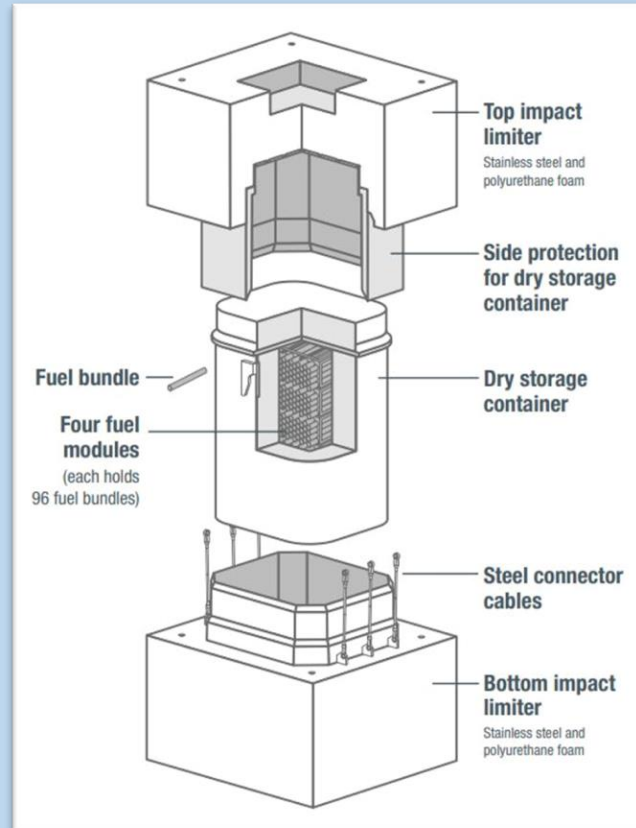
Source: NWMO 2021 Transportation LTE Design Report

# Proposed Transportation Containers

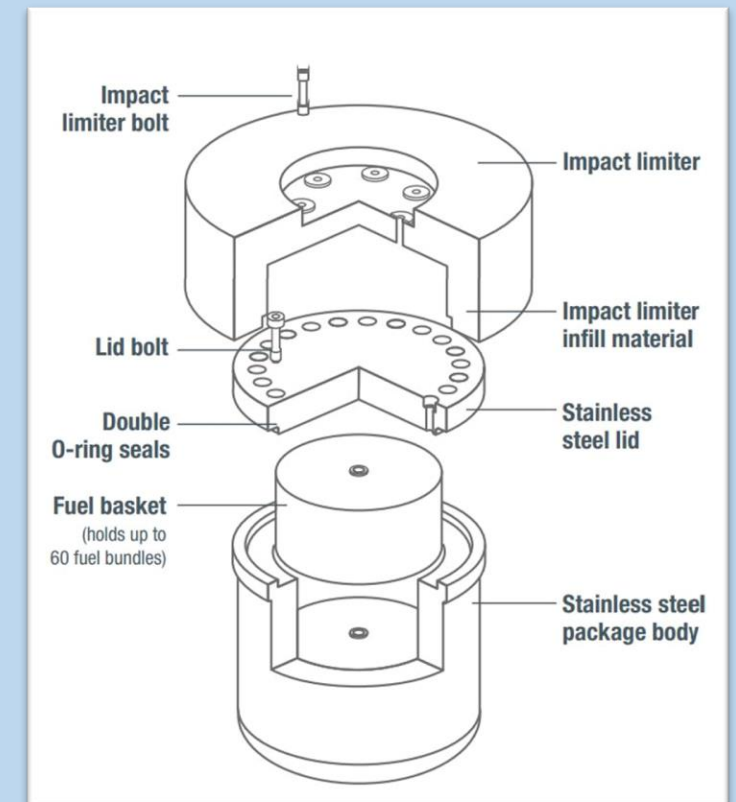
\* “superload”



**Used Fuel Transportation Package (UFTP)**  
35 tonnes loaded  
192 used fuel bundles



**Dry Storage Container Transportation Package (DSC-TP)** – 100 tonnes loaded,  
384 used fuel bundles



**Basket Transportation Package (BTP)** (under development)  
28 tonnes loaded,  
120 used fuel bundles



# Tests Performed on Transportation Packages

## Free-Drop Test



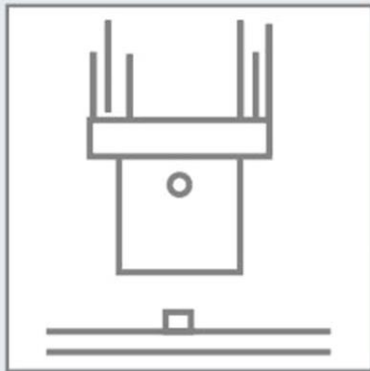
The package is dropped from nine metres (30 feet) onto a flat, unyielding surface (such as a steel-reinforced concrete pad), striking the surface in the orientation that will result in the most damage to the package.

## Thermal Test



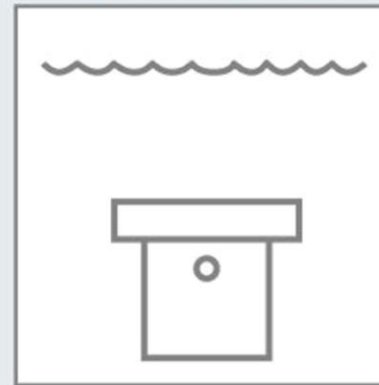
The same package used in the drop and puncture tests is then subjected to a fully engulfing petroleum fire. The fire temperature must reach 800 degrees Celsius (1,475 degrees Fahrenheit) for 30 minutes.

## Puncture Test



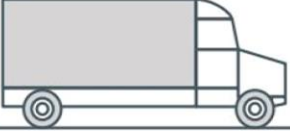
After the drop test, the same package is subjected to a one-metre (40-inch) free drop onto a 15-centimetre (six-inch) diameter steel bar at least 20 centimetres (eight inches) long.

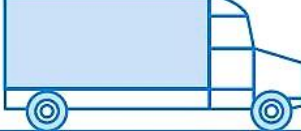


## Immersion Test



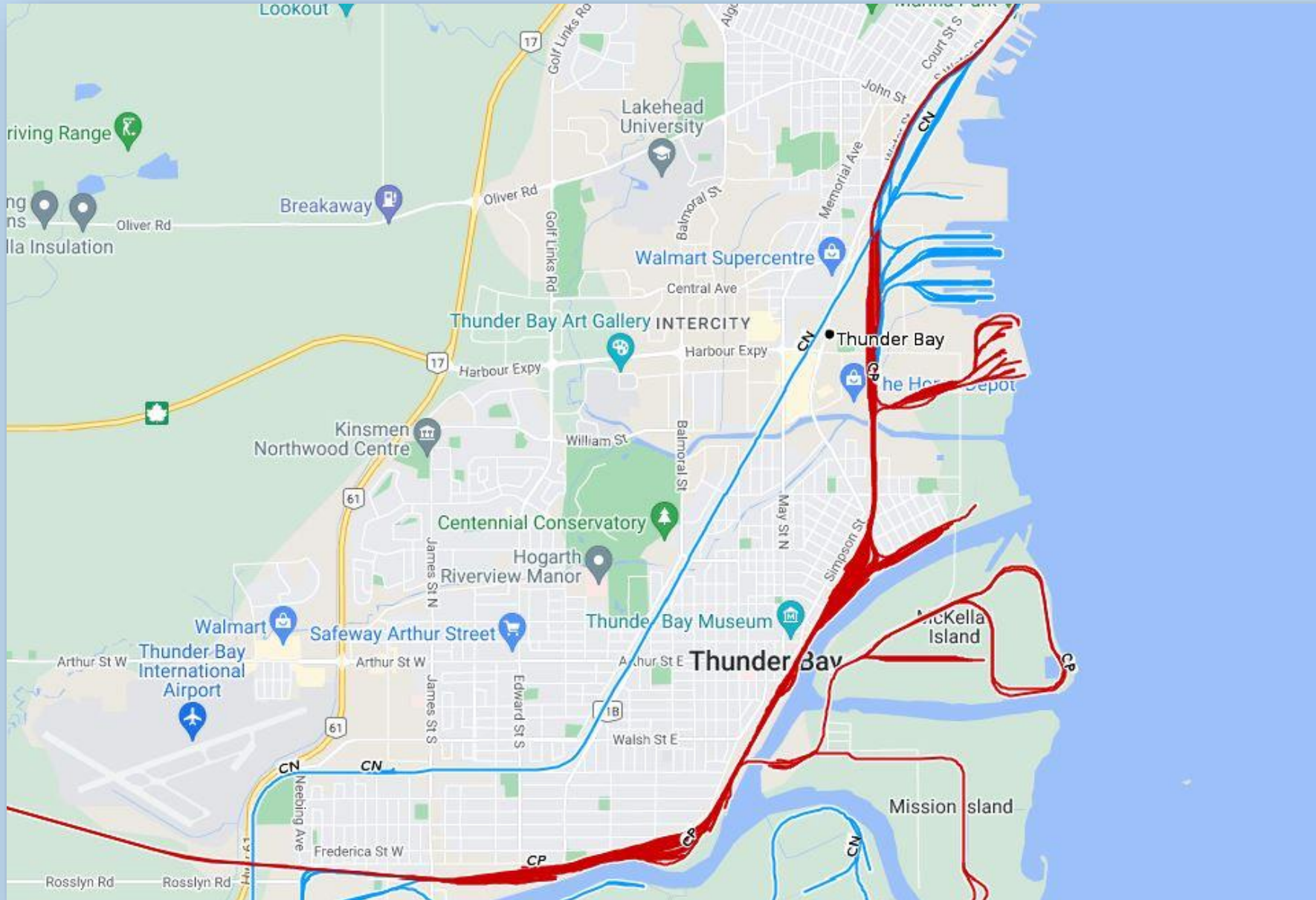
Using either computer analysis or physical testing methods, the package is subjected to external pressure that is the same as if it were immersed under 15 metres (50 feet) of water for at least eight hours to test for leakage. The package is also subjected to an enhanced water immersion test at 200 metres (650 feet) to test its ability to withstand extreme external pressures.

# Packages/Shipments per Year by Road and Rail

All road (reference case)	Both sites
Truck	
	576 UFTPs/year – 1 package/truck 78 BTPs/year – 1 package/truck
Total: 654 shipments/year	

Road/rail alternative	South Bruce	Ignace area
Truck		
	78 BTPs/year 1 package/truck	78 BTPs/year 1 package/truck
Superloads		
	288 DSC-TPs/year 1 package/truck	165 DSC-TPs/year 1 package/truck
Rail		
	25 DSC-TPs/year 5 packages/train	22 DSC-TPs/year 14 packages/train
Total: 391 shipments/year		Total: 265 shipments/year

# CP Rail through Thunder Bay (red)



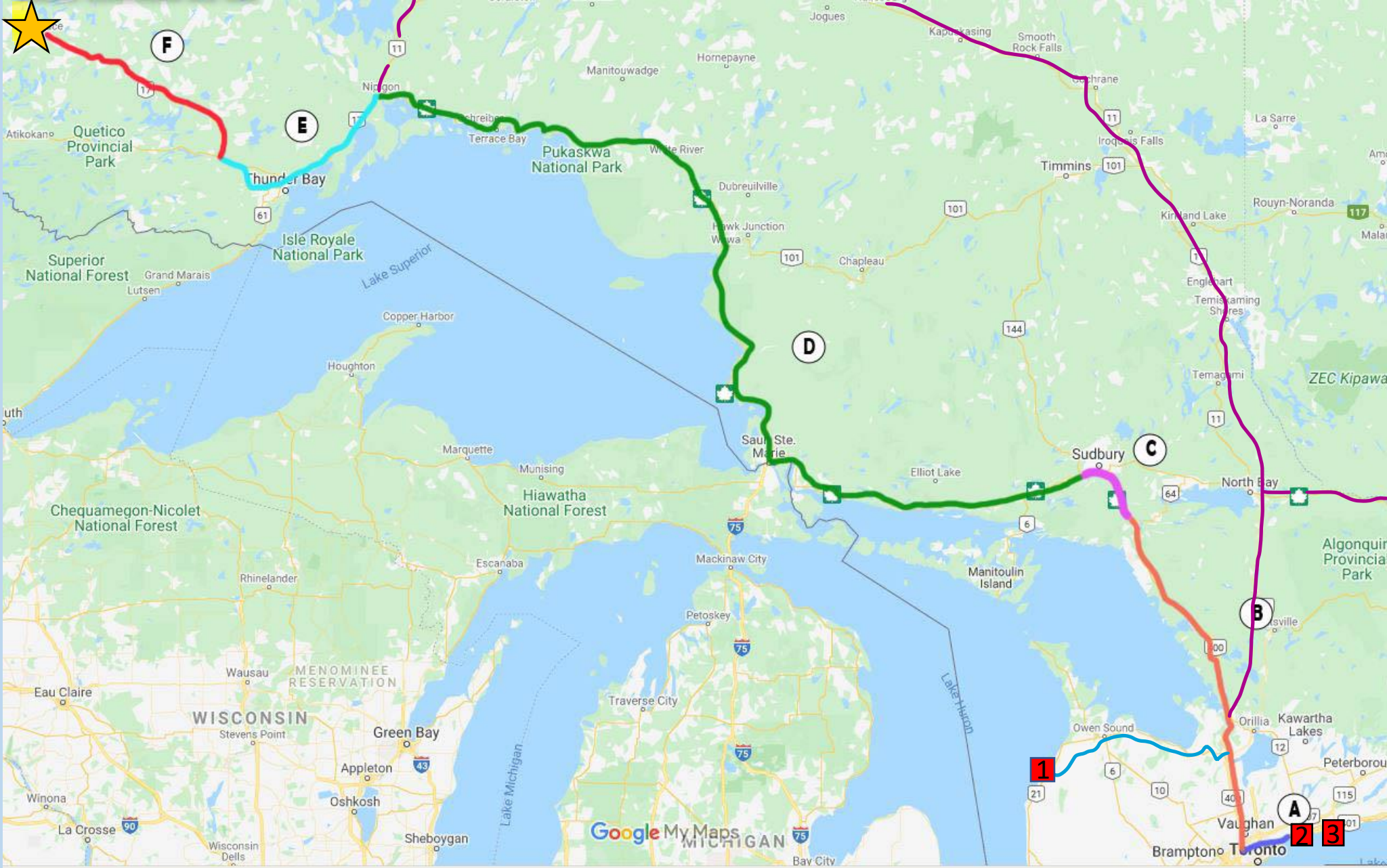
# Dangers of rail transport

**Ice-Jacking:**



**Sun-Kinking:**





**Potential highway route for nuclear fuel waste from:**

- (1) Bruce Nuclear Generating Station,**
- (2) Pickering Nuclear Generating Station and**
- (3) Darlington Nuclear Generating Station**

**to the Revell Lake site** ★ **40 km west of Ignace**



# First Nations Communities on the Proposed Trucking Route

*"[We] vehemently oppose the NWMO's concept of a DGR near Ignace, Ontario due to many health and safety concerns, the potential for devastating impacts to the environment, and the lack of consent from NAN communities and members."* – Nishnawbe Aski Nation Chiefs-in-Assembly, August 2022



## ONTARIO HIGHWAY COLLISIONS - PICKERING TO IGNACE: 2015 - 2020

Highway Section Description	Truck Collisions	All Collisions	% Truck Collisions
A. Hwy 401, from Brock Rd. Pickering TO Hwy 400 North York	3,450	25,337	13.6%
B. Hwy 400 at 401 Ramp North York, TO End of Hwy 400	1,855	14,533	12.7%
C. End of Hwy 400, south of Sudbury, TO Hwy 17 near Sudbury	200	1,112	17.9%
D. Hwy 69/Hwy 17 near Sudbury, TO Hwy 11 E. Jct. at Nipigon	820	4,124	19.8%
E. Hwy 17 at Nipigon, TO Hwy 17 Shabaqua	318	1,636	19.4%
F. (End of overlap of Hwy 17/Hwy. 11 W. Jct.) at Shabaqua, TO East Street in Ignace	<u>367</u>	<u>712</u>	51.5%
<b>TOTALS: Pickering to Ignace</b>	<b>7,010</b>	<b>47,454</b>	

Source: Ontario Ministry of Transportation, via Freedom of Information Act request

## HIGHWAY 17 - SHABAQUA TO IGNACE ONLY

	# Truck	# All	% Truck
Year	Collisions	Collisions	Collisions
2015	55	119	46%
2016	54	119	46%
2017	50	118	42%
2018	49	94	52%
2019	98	149	66%
2020	<u>61</u>	<u>113</u>	54%
Total	367	712	

**Average percent Truck Collisions 2015-2020 = 52%**



Do I want to be one of the small handful of people who decided for the first time in Canadian history, that it is perfectly good practice to abandon long-lived human-made radioactive waste materials?

Do I truly believe that our present knowledge of science, technology and nature is sufficient for me to be certain of the validity of this course of action for the next 100,000 to 1,000,000 years?

~ Dr. Gordon Edwards,  
President, Canadian Centre for Nuclear Responsibility

# Transporting waste is a regional issue

ON DEC. 21, Anishinabek Nation clearly expressed their opposition to the Nuclear Waste Management Organization's (NWMO) plan to dispose of Canada's used nuclear fuel bundles. They stated they are not convinced by testing of containers for nuclear waste, saying that "transportation across our territories is a risk to both our people and the environment."

NWMO's plan is to send two, probably three, transport trucks a day, each carrying one UFTP filled with 192 used nuclear fuel bundles to a nuclear waste dump site, 40 kilometres west of Ignace. They have said that they may also transport used nuclear fuel bundles by train every five days.

Imagine if one of these transport trucks has an accident or a loaded train derails along the transportation corridor. What happens when the truck or train crashes down the Canadian Shield rock embankment, is punctured several times by the rock and settles into the water, such as a bay in Lake Superior?

NWMO just tests for a single puncture. How many hours will it take for NWMO's response team to arrive with the much-needed heavy equipment, like a crane? Their immersion tests only allow for one to two hours immersion in water depths.

What if ice-jacking or kinking results in a derailment or a collision with another train carrying dangerous fuel, like oil or gas? Their thermal test allows a fire at 800 degrees Celsius for 30 minutes. The test after days of fire for their train disaster the one-minute test means not

NWMO's free drop test, puncture test, immersion and thermal tests do not consider the real damage and the time it will take to attend to the recovery of the load and

the contamination of the environment and water.

Over the past 50 years, according to NWMO's transportation document, Canada has transported an average of five high-level waste shipments per year. They do not point out that these have usually been very small shipments and that the distances travelled do not compare to the thousands of miles that they are proposing. Their plan is to ship two to three truckloads per day (600 to 900 shipments per year) for 45 years, depending on the tonnage of used fuel bundles. This cannot be compared to the five shipments per year that have happened in the past.

Also noteworthy are ministry of transportation statistics over the past 10 years regarding transport truck collisions compared to all collisions. Transport truck collisions accounted for 41 per cent of all collisions in 2010. That number has jumped to 51.5 per cent in 2020. Given the number of recent accidents, we may be higher again.

Between the Pickering reactor site and Ignace, there were 7,010 transport truck collisions from 2015 to 2020.

This is Exhibit "B" referred to in the

Affidavit of Doris LeGassick

affirmed before me over video teleconference

this 4th day of February, 2026.

The affiant, Doris LeGassick, located in Thunder Bay, Ontario, and the commissioner, Jenna Brunt, located in

Thunder Bay, Ontario.

*Jenna Brunt*

A Commissioner, etc.

Jenna Brunt  
Law Society of Ontario #94333B  
705-471-3509

Dodie Legassick  
KAKABEKA FALLS



Mayor and Council  
Conmee Township  
19 Holland Rd W  
Kakabeka Falls, ON P0T 1W0

Jan. 19, 2026

Dear Mayor Maxwell and Conmee Twp. Councillors,

cc: Karen Paisley, Clerk

You may recall our deputation to Conmee Council in June of 2024, to bring awareness of the transportation dangers of the Nuclear Waste Management Organization's proposal to ship all of Canada's nuclear fuel waste to a site between Ignace and Dryden, at 2-3 loads a day for 50 years, along Hwy 11/17.

Thank you again for the opportunity to make that deputation, and for your ensuing Resolution on Aug. 27, 2024 in favour of the management of such wastes in the vicinity of the reactor sites, precluding the need for long-distance transport.

As you may be aware, the Impact Assessment for the Nuclear Waste Management Organization's (NWMO's) proposed Deep Geological Repository (DGR) has commenced. The initial project description (IPD) was posted on the Impact Assessment Agency's public registry on Jan. 5, 2026. The IPD sets out the general scope of the assessment including the project's core elements, purpose, location and activities. There is now an opportunity for the public to comment on whether the IPD adequately identifies all the concerns that matter to the affected communities. **The deadline to respond during this initial comment period is Feb. 4, 2026.**

Startlingly, **the NWMO has excluded the transportation of the high-level radioactive nuclear waste from their project description.** This is very troubling, as the transportation component of the project has been the most important concern for residents in Conmee as well as in other communities and First Nations in northwestern Ontario and along the transportation route more generally.

Transportation is clearly an integral part of the NWMO's proposed project, and has been featured in their *Adaptive Phased Management* plan for 20 years. It is unconscionable that they should try to leave out their proposed transportation plan from the impact assessment.

We are writing to request that Conmee Township participate in the impact assessment process to ensure that the concerns of Conmee residents regarding the risks and hazards associated with transportation of nuclear waste are adequately addressed. **We encourage all those who comment during this initial comment period to demand that the Impact Assessment Agency include a full examination of transportation as part of their assessment, and that they conduct a full Impact Assessment process with a public hearing.**

We also suggest that you amplify these concerns by conveying them to the Federal Minister of Energy and Natural Resources, and Federal Minister of the Environment and Sustainability. Public input is an essential component of impact assessments in Canada, and municipal government often participate.

For your convenience, here is the link to the Impact Assessment Agency's webpage concerning the Assessment of the NWMO project: <https://iaac-aeic.gc.ca/050/evaluations/proj/88774?culture=en-CA>. You will also find more information about the review process and resources to support public participation at <https://wethenuclearfreenorth.ca/impacts/>.

If Conmee Twp. does not choose to comment to the IAAC at this time, we suggest that the township request to be placed on the IAAC's email list for this assessment, to receive notices on assessment updates and any future comment periods. The request may be emailed to the Agency at [nuclearwaste-dechetsnucleaires@iaac-aeic.gc.ca](mailto:nuclearwaste-dechetsnucleaires@iaac-aeic.gc.ca).

We thank you for your attention to this matter, and are hopeful that you will take action on behalf of your residents.

Yours sincerely,



Dodie LeGassick – Nuclear Lead, Environment North (environmentnorth@gmail.com)



Wendy O'Connor – Member, We the Nuclear Free North (nuclearfreenorth@gmail.com)

## MEDIA RELEASE

For immediate release

From: Environment North  
We the Nuclear Free North



### Two Organizations Present to City's Inter-governmental Nuclear Fuel Waste

**February 15, 2024** - At the City of Thunder Bay's Inter-governmental meeting yesterday, Dodie LeGassick of Environment North gave a 10-minute presentation on transportation concerns around the nuclear industry's proposed waste at a site between Ignace and Dryden. Wendy O'Connor presented for We the Nuclear Free North on regulatory and ethical issues around the proposed project.

Both of yesterday's deputations, as well as a December 2023 deputation by Charles Faust of Nuclear Free Thunder Bay, are intended to inform the Committee before it makes an anticipated recommendation to City Council on supporting a Proximity Principle with regards to nuclear fuel waste. Such a principle, if adopted by the Provincial government, would preclude the waste's transportation and burial in Northwestern Ontario.

"Transporting and burying this waste is fraught with risks, and we want to dispel the notion that Northwestern Ontario has benefitted from the last 50+ years of nuclear power production in Southern Ontario and Eastern Canada, or has an obligation to receive the resulting waste," said LeGassick. "Even today, when we turn on a light switch in Northwestern Ontario, we are getting 86% hydro and biomass power, produced in our region. Other sources are wind power, and hydro power from Manitoba."

Wendy O'Connor added that informed consent is a problem for the two small communities the Nuclear Waste Management Organization (NWMO) has designated as having decision-making power over whether the project proceeds. "Residents in the Twp. of Ignace and in Wabigoon Lake Ojibway Nation are being asked to express willingness before essential questions are addressed – before there is an Environmental Assessment, before the NWMO has many basic aspects of the design finalized, and before they can possibly have robust, long-term data about seismic activity, as one example. That citizens along the transportation route and in the extensive watersheds of the proposed project, who would also bear significant risks, are excluded from the decision makes the nuclear industry's siting process that much more scandalous."

Around 50 local residents who oppose the transportation of nuclear fuel waste through Thunder Bay and its burial in Northwestern Ontario were present at City Hall for the deputations.

This is **Exhibit "C"** referred to in the

Affidavit of Doris LeGassick

affirmed before me over video teleconference

this 4th day of February, 2026.

The affiant, Doris LeGassick, located in Thunder Bay, Ontario, and the commissioner, Jenna Brunt, located in Thunder Bay, Ontario.

*Jenna Brunt*

A Commissioner, etc.

Jenna Brunt  
Law Society of Ontario #94333B  
705-471-3509

**Deputation to Township of Council**  
**April 23, 2024**  
**by**  
**Dodie LeGassick and Mary Veltri**

**on Behalf of**

**We the Nuclear Free North and Environment North**

**RE: Concerns About Nuclear Waste in Northwestern Ontario**

---

Thank you for allowing us to speak to you this evening about a matter that could have serious negative impacts on your community – its residents and the surrounding environment - for generations to come. We represent WTNFN, an alliance of people and groups, including Environment North, who oppose a Deep Geological Repository for nuclear waste in Northern Ontario. We are also board members of Environment North, an NGO in operation since 1972, which conducts research, education and community advocacy to promote sustainability, protection of the environment and community engagement in decisions impacting the environment.

We, along with a growing number of communities and First Nations and most recently, the Council of Canadians, oppose the transport, burial and abandonment of radioactive nuclear waste in our northern watersheds, as proposed by NWMO. We continually challenge the NWMO to honestly address the risks associated with this proposal and to adopt a broader consultation process that would include all of the communities along the transportation route in their assessment of “willingness”.

We are here today to address our concerns about the NWMO process to establish a deep geological repository (DGR) at Revell Lake located in the Wabigoon Lake Ojibway Nation- Ignace area in northwestern Ontario and the risks associated with transportation of used nuclear fuel waste through your community. We are asking you to consider passing a resolution that supports our campaign to stop the NWMO from proceeding with their northwestern Ontario option.

I would like to first address our concerns with the NWMO and its site selection process. Dodie will be addressing the transportation issues.

**1. The Nuclear Waste Management Organization Prioritizes Nuclear Industry Interests**

The Nuclear Waste Management Organization has been mandated to design, construct and operate a repository, as well as design and implement a site selection process. It was established in 2002 under the **Nuclear Fuel Waste Act**. The Nuclear Industry founded the NWMO and the NWMO’s Board members and advisory council are all appointed by the three

nuclear energy corporations (Ontario Power Generation Inc., Hydro-Quebec and New Brunswick Power Corporation).

Prior to the establishment of the NWMO, the federal government had established an expert panel to oversee an environmental assessment of the Geologic Disposal Concept for High Level Radioactive Waste. In 1998, after a 10-year review of evidence and submissions from public hearings, the Panel concluded that the Canadian public did not support the concept of burying nuclear waste and recommended that a neutral, nuclear fuel waste management agency be created, at arm's length from the utilities and AECL (Atomic Energy of Canada Ltd.)

The federal government ignored this key recommendation and instead tasked the industry-controlled Nuclear Waste Management Organization with the responsibility to design and implement a plan for the long-term storage of high-level radioactive waste.

Currently, Canada's active and decommissioned nuclear power plants, located in Ontario, New Brunswick, Quebec and Manitoba, have produced over the past 60 years a stockpile of approximately 3.3 million spent nuclear fuel bundles that increases at a rate of about 90,000 bundles per year (NWMO). If all the currently operating plants live out their licensed lifetimes, they will have to dispose over 6 million fuel bundles. With the NWMO's ever changing plans, it is expected that the high-level radioactive waste from Small Modular Reactors will also be added to the proposed DGR.

Naturally, the industry-led NWMO is keen to bury and abandon the nuclear waste in a remote place so that they can proceed with their plans for expansion of nuclear power despite all the negative impacts caused by the nuclear fuel chain.

Rather than holding wide public consultations, the NWMO's process has been fundamentally unfair and exceedingly partial to what the industry wants. Given the long-term health and environmental risks associated with nuclear waste, we believe broader more inclusive consultation must take place, one that respects the principles of free, prior and informed consent for Indigenous people and includes all potentially impacted people.

## **2. Inadequacy of Canadian Nuclear Safety Commission**

The Canadian Nuclear Safety Commission is the licensing body that is ostensibly in place to regulate the nuclear industry and ensure public safety. Once the NWMO completes its site selection process, it will need to apply for a license from the CNSC. However, the CNSC has repeatedly come under criticism for allowing nuclear operators to violate safety standards and their licence requirements.

One might expect that the NWMO's plans concerning the transportation of nuclear fuel waste, the containers, the repository design are vetted and scientifically vetted and overseen. The Canadian Nuclear Safety Commission (CNSC) is the regulator, so one would think that it carefully reviews the NWMO's technical plans, and uses its power to say yes or no to them. However, this is not the case.

The CNSC follows the nuclear industry's lead. Rather than setting safety standards, the Commission merely reviews whether the industry is following its own rules. And even when the industry breaks its own rules, as was on the news recently in the case of the Canadian Nuclear

Laboratories buried reactor at Pinawa, CNSC will issue relatively small fines. CNSC has never withheld a licence to a nuclear facility. As a result, the CNSC is often referred to as a “captured regulator”.

This unfettered delegation of power to the NWMO, without government oversight, has enabled the NWMO to design its own processes for consultations, determination of “willingness” and definition of “host community. We therefore suspect that the CNSC licensing process will simply be a rubber stamping of the NWMO decision

### **3. Lack of Consultation with Communities Directly Affected by the Proposal**

Environmental justice requires that the people who are affected by a decision ought to be consulted. Despite living along the transportation route where Schreiber residents will have daily exposures of gamma radiation from the transports or train cars carrying nuclear waste, your community, has not been directly engaged in a consultation process. Your community will also be exposed to the risk of catastrophic harm resulting from an accident or military attack. It is not fair that residents along the route have been excluded from the willingness process, not informed of the risks, nor given a say in the process.

It is only Ignace and Wabigoon Lake Ojibway Nation who will decide for all of us in northwestern Ontario whether there is willingness to have the DGR sited in our region. Interestingly, the Revell Lake site is not even within the town boundaries of Ignace nor within its watershed. Communities closer to the proposed site and living downstream have also been excluded from the consultation process.

We believe a proposal with the potential for this magnitude of regional impacts should not proceed without regional input, particularly from communities along the transportation route and downstream from the proposed site.

### **4. Willingness Process**

The NWMO has stated that they will only proceed in an area with “willing and informed hosts.” Willingness suggests consent is freely given. However, the power imbalance between the nuclear industry and the small, regionally-isolated and economically-marginalized community of Ignace with a population of 1,200 is huge. This raises many ethical questions.

The NWMO has deep pockets (funded by utility ratepayers) and has been trying to buy consent by pouring cash into Ignace to engage and seek their support. In 2023 alone Ignace received \$1.7 million for local projects and infrastructure as part of their funding agreement. To date, they have received an estimated \$10 million with millions more promised with the signing of the hosting agreement.

Similarly, “informed” implies that the community has received information about the risks and benefits of being a host community. However, the NWMO materials do not address any of the risks associated with their proposal or the harms associated with radioactive exposure and contamination. The NWMO plan to transport, process and bury high-level nuclear waste is not a complete plan. It includes a number of ‘concepts’ which are still being developed, and there are large gaps in the information. How can the residents be informed about a plan that lacks concrete details and material facts?

### **5. Environmental Justice**

A fundamental principle of environmental justice is that environmental benefits and burdens should be equitably distributed among all persons, rather than allowing the majority of adverse

impacts to be unfairly imposed upon visible minorities, Indigenous and/or marginalized communities. We oppose the imposition of a repository for all of Canada's nuclear waste in northwestern Ontario because we do not rely on nuclear energy as a source of electricity. Northwestern Ontario's energy supply comes from hydro, biomass, solar and wind. It is Southern Ontario and New Brunswick that have relied on and reaped the benefits from nuclear energy. In keeping with the proximity principle, and environmental justice, the nuclear waste ought to be stored as close to the site of generation as possible.

Finally, there are many uncertainties about the whether the repository will be able to prevent radioactive materials leaking out into the water and earth over the hundreds of thousands of years for which they will remain hazardous. There are many unanswered questions about the properties of the fuel over such immense time frames, the behaviour of the geological formations, the ability of human technology to withstand environmental pressures over decades, much less thousands and hundreds of thousands of years and the possibility of cataclysmic events. While our generation may not experience the negative consequences of this plan, it is an intergenerational injustice to burden people not yet born with the impacts caused by burying radioactive waste.

**Deputation to Terrace Bay Town Council**

**May 21, 2024**

**By**

**Dodie LeGassick and Mary Veltri**

**On Behalf of:**

**We the Nuclear Free North and Environment North**

**RE: Concerns About Nuclear Waste in Northwestern Ontario**

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**Introduction:**

Thank you for allowing us to speak this evening about a matter that could have serious consequences for our community and all of Northwestern Ontario. We represent WTNFN, an alliance of people and groups, including Environment North, who are opposing a Deep Geological Repository for nuclear waste in Northwestern Ontario. We are also board members of Environment North, an NGO in operation since 1972, which conducts research, education and community advocacy to promote sustainability, protection of the environment and community engagement in decisions impacting the environment.

**Background:**

1. The Nuclear Waste Management Organization (NWMO) is in the process of trying to secure a “willing host” where they can dispose of Canada’s high level radioactive waste in a deep geological repository (DGR).<sup>1</sup> This process is scheduled to be completed this year. Two potential sites are under consideration: Teeswater, located in the Saugeen Ojibway Nation- South Bruce area and the Revell site in the Wabigoon Lake Ojibway Nation-Ignace area.
2. There is growing opposition to siting the proposed DGR at the Revell site for a number of reasons. Today we wish to focus on two major concerns directly impacting the residents of Terrace Bay:
  - the lack of fairness in excluding communities along the north shore from the “willingness” process; and
  - the environmental impact of transporting nuclear waste

**Lack of Consultation with Communities Directly Affected by the Proposal**

3. The NWMO, a body created by the nuclear industry, has devised a very narrowly-scoped engagement strategy that serves the industry’s interests but ignores the views of the

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<sup>1</sup> By the end of their lifespans, Canada’s existing nuclear reactors are projected to produce more than 5.6 million bundles of fuel waste, weighing over 100,000 tonnes. As of 2023, Canada’s existing inventory is about 3.3 million used nuclear fuel bundles. If stacked like cordwood, this high level radioactive waste could fit into about nine NHL hockey rinks from the ice surface to the top of the boards. The NWMO expects these projections to increase with the addition of new nuclear reactors and SMR’s. Nuclear Waste Management Organization Nuclear Fuel Waste Projections in Canada -2023 Update

majority of people impacted by their decision. Their consultation process has failed to engage or seek consent from the residents of Terrace Bay and other communities along the transportation route even though they will be directly affected by the shipments of high-level radioactive waste by rail or by road for a period of 50 years.

4. The necessity of having “**broad public support**”, to ensure the acceptability of any disposal method for managing nuclear fuel wastes, has been a guiding principle for the nuclear industry in Canada since the Seaborn Panel completed their independent environmental assessment of the DGR concept in 1998.<sup>2</sup> International norms for the siting of nuclear waste disposal have continued to include a decision-making process that embodies **procedural fairness and public acceptance**.<sup>3</sup>
5. Despite paying lip service to the principle of ensuring there is “willingness” for their decision, NWMO has unilaterally decided to seek consent from only two small communities in Northwestern Ontario – Ignace and Wabigoon Lake Ojibway Nation - with a combined population of about 1,360 residents. Meanwhile the rest of us in Northwestern Ontario have been shut out from the consultation process. The Revell site is not in Ignace boundaries.
6. We believe a project of this magnitude, with an environmental footprint and risk to our health and safety of this scale, should at the very least be a regional decision. The consultation process NWMO has followed is a far cry from gaining broad public support as recommended by the Seaborn Panel.

### **Willingness Process**

7. The NWMO states that they will only proceed in an area with “willing and informed hosts.” “Willingness” suggests consent is freely given. However, the power imbalance between the nuclear industry and the small, regionally-isolated and economically-marginalized communities of Ignace and Wabigoon Lake Ojibway Nation is huge. The recently completed voting process in Ignace was not at all straightforward. Rather, a consultant was hired to study community willingness using an online poll to the willingness engagement committee who will in turn make a recommendation to council on whether to proceed or withdraw as a potential host community for an underground nuclear waste repository.
9. The NWMO has deep pockets (funded by utility ratepayers) and has been trying to buy consent by pouring cash into these communities to seek their support. To date, Ignace has received an estimated \$10 million with millions more promised upon the signing of the hosting agreement.
10. Similarly, “informed” implies that the community has received objective information about the risks and benefits of being a host community. However, the NWMO either avoids or downplays the economic, social and environmental costs of managing radioactive waste.

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## **2**

Environmental Assessment Report on AECL's Geologic Disposal Concept for High Level Radioactive Waste, Executive Summary ([http://www.ccnr.org/hlw\\_fearo\\_summary.html](http://www.ccnr.org/hlw_fearo_summary.html))

<sup>3</sup> Yokoyama, M., Ohnuma, S., Osawa, H. *et al.* Public acceptance of nuclear waste disposal sites: a decision-making process utilising the ‘veil of ignorance’ concept. *Humanit Soc Sci Commun* **10**, 623 (2023). <https://doi.org/10.1057/s41599-023-02139-2>

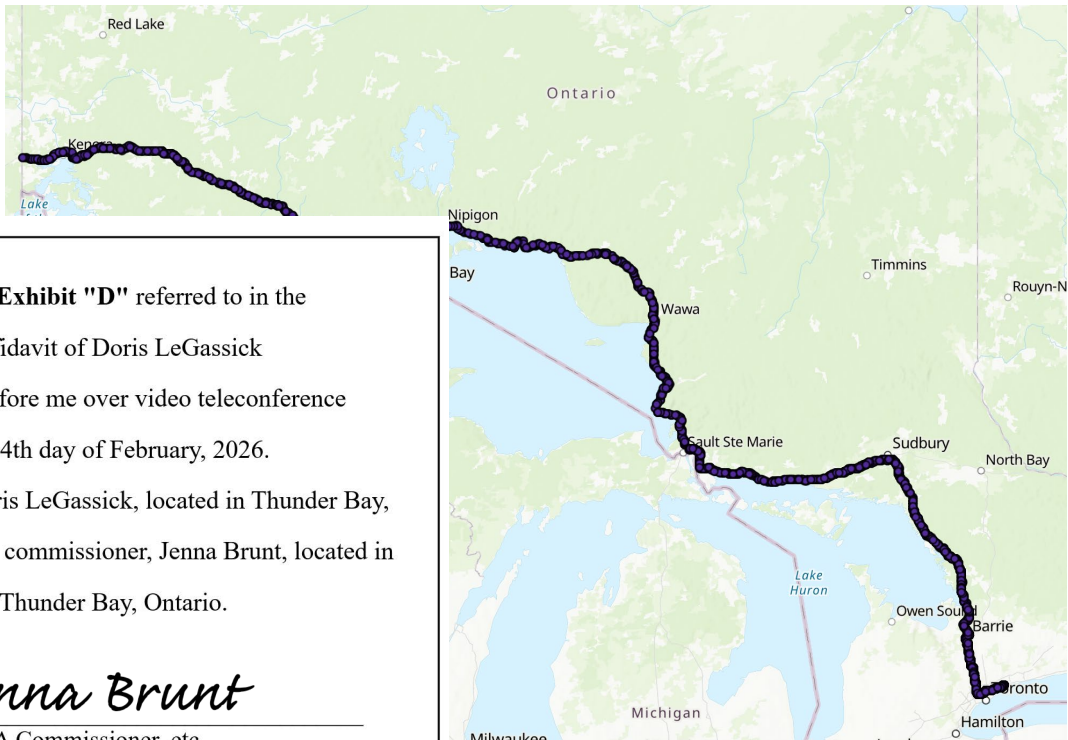
11. The plan to transport, process and bury high-level nuclear waste is not a complete plan. It includes a number of 'concepts' which are still being developed, and there are large gaps in the information. How can the residents be informed about a plan that lacks concrete details and material facts?

### **Environmental Justice**

12. A fundamental principle of environmental justice is that environmental benefits and burdens should be equitably distributed among all persons, rather than unfairly imposing the majority of adverse impacts upon Indigenous and/or marginalized communities. We do not benefit from nuclear energy in Northwestern Ontario so why should we bear the burden of storing its waste? Our energy supply comes from hydro, biomass, solar and wind. It is Southern Ontario and New Brunswick that have relied on and reaped the benefits from nuclear power. In keeping with the proximity principle, and environmental justice, nuclear waste ought to be stored as close to the site of generation as possible.
13. There are many technical challenges to claims that the repository will be able to prevent radioactive materials leaking out into the water and earth over the hundreds of thousands of years for which they will remain hazardous. There are uncertainties about the properties of the fuel, the behaviour of the geological formations and the ability of the technology to withstand environmental pressures over such an immense time frame as well as the possibility of cataclysmic events. While our generation may not experience the negative consequences of this plan, it is an intergenerational injustice to burden people not yet born with the impacts caused by burying radioactive waste.
14. Multiple First Nations in Robinson Superior and Treaty 3 territories, as well as municipalities along the transportation route such as Red Rock and Nipigon or downstream from the proposed site such as Grassy Narrows and LaVallee have expressed opposition to the NWMO proposal. By joining these communities, Terrace Bay will be speaking up for the environment and telling the NWMO that they oppose their unreasonable scheme to make Northwestern Ontario the dumping ground for all of Canada's high level nuclear waste.

# All Vehicle Collisions

YEAR	HWY	Fatal Injury	Intentional	Non-Fatal Injury	Non-Reportable	Other	Property Damage Only	Total
<b>Total</b>		<b>65</b>	<b>3</b>	<b>2027</b>	<b>2</b>	<b>1</b>	<b>19329</b>	<b>21427</b>
⊖ <b>2022</b>	<b>Total</b>	<b>24</b>		<b>809</b>	<b>1</b>	<b>1</b>	<b>7370</b>	<b>8205</b>
	102	1		4			25	30
	11	1		14	1	1	147	164
	17	12		135			941	1088
	17A			2			14	16
	400	4		194			2078	2276
	401	3		433			4004	4440
	404						1	1
	69	3		27			160	190
⊖ <b>2023</b>	<b>Total</b>	<b>29</b>	<b>3</b>	<b>861</b>	<b>1</b>		<b>8291</b>	<b>9185</b>
	102	1		2			24	27
	11	7		7			121	135
	17	15	1	147			812	975
	17A			3			20	23
	400	3	1	235	1		2350	2590
	401	2	1	442			4802	5247
	404			2			2	4
	69	1		23			160	184
⊖ <b>2024</b>	<b>Total</b>	<b>12</b>		<b>357</b>			<b>3668</b>	<b>4037</b>
	102			4			11	15
	11			3			49	52
	17	7		53			416	476
	17A	1					9	10
	400	2		94			1005	1101
	401	2		192			2096	2290
	404						1	1
	69			11			81	92



This is **Exhibit "D"** referred to in the Affidavit of Doris LeGassick affirmed before me over video teleconference this 4th day of February, 2026.

The affiant, Doris LeGassick, located in Thunder Bay, Ontario, and the commissioner, Jenna Brunt, located in Thunder Bay, Ontario.

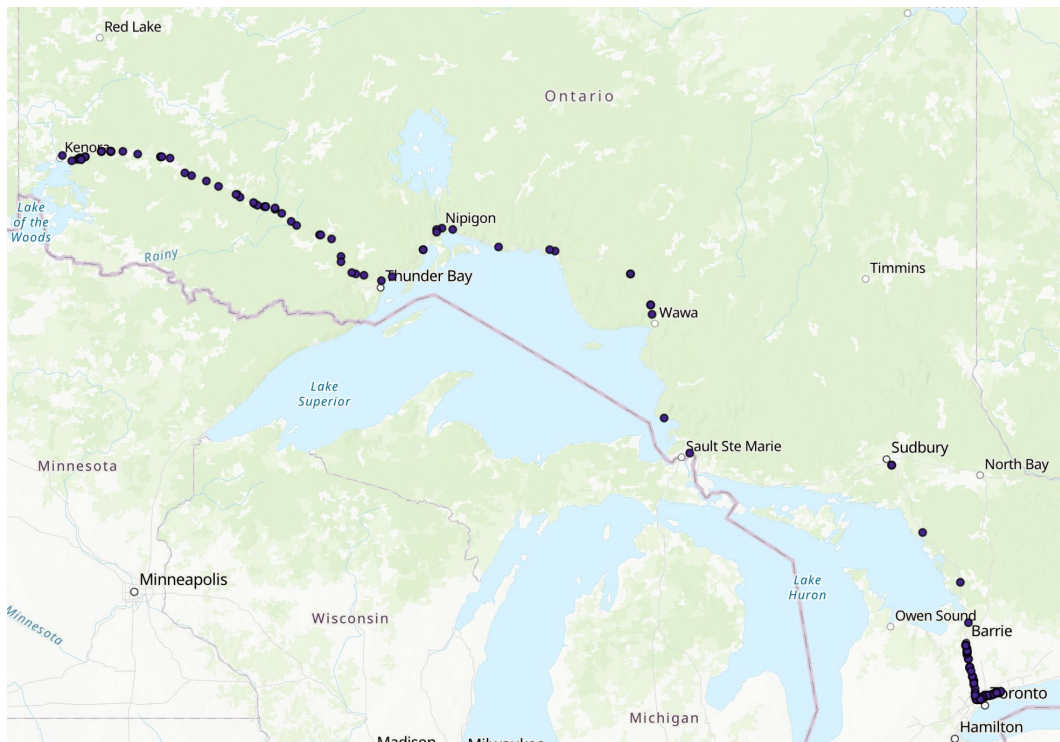
*Jenna Brunt*

\_\_\_\_\_  
A Commissioner, etc.

Jenna Brunt  
Law Society of Ontario #94333B  
705-471-3509

# Truck-Involved Collisions

YEAR	HWY	Fatal Injury	Intentional	Non-Fatal Injury	Other	Property Damage Only	Total
<b>Total</b>		<b>31</b>	<b>2</b>	<b>398</b>	<b>1</b>	<b>3228</b>	<b>3660</b>
2022	<b>Total</b>	<b>10</b>		<b>174</b>	<b>1</b>	<b>1325</b>	<b>1510</b>
	102	1		4		8	13
	11			3	1	58	62
	17	6		35		286	327
	17A			1		3	4
	400	1		41		300	342
	401			87		639	726
	69	2		3		31	36
2023	<b>Total</b>	<b>14</b>	<b>2</b>	<b>157</b>		<b>1319</b>	<b>1492</b>
	102			1		13	14
	11	5		1		39	45
	17	9	1	35		213	258
	17A			2		6	8
	400			39		289	328
	401		1	74		729	804
	404			1			1
	69			4		30	34
2024	<b>Total</b>	<b>7</b>		<b>67</b>		<b>584</b>	<b>658</b>
	102			2		6	8
	11			1		12	13
	17	5		11		114	130
	17A	1				3	4
	400			13		123	136
	401	1		38		303	342
	404					1	1
	69			2		22	24



<b>HIGHWAY 17 - SHABAQUA TO IGNACE</b>			
<b>Year</b>	<b># Truck Collisions</b>	<b># All Collisions</b>	<b>% Truck Collisions</b>
2015	55	119	46%
2016	54	119	46%
2017	50	118	42%
2018	49	94	52%
2019	98	149	66%
2020	61	113	54%
<b>Total</b>	<b>367</b>	<b>712</b>	
Average percent Truck Collisions 2015-2020 = 52%			
Source: Ontario Ministry of Transportation, via Freedom of Information req.			
Material shipped from South Bruce would merge onto Hwy 400 after 13 turns and 107.91 km. Approximate driving time to Ignace: 17 hours			

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**AFFIDAVIT OF GRAHAM SAUNDERS**

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I, **GRAHAM SAUNDERS**, of the Municipality of Neebing in the Thunder Bay District in the Province of Ontario, **MAKE OATH AND SAY:**

1. My name is Graham Saunders. I am a member of the Board of Directors for Environment North, an environmental organization founded in 1972, and I currently serve as Board President.
2. I make this affidavit to share my background, my experience in public education and advocacy related to nuclear issues, and my concerns regarding the Nuclear Waste Management Organization's ("NWMO") Initial Project Description ("IPD") for the proposed Deep Geological Repository ("DGR") for Canada's used nuclear fuel.

**I. BACKGROUND INFORMATION**

3. I was born in Sydney, Australia and grew up primarily in Canada. I have lived in both Australia and Canada. I currently reside in Neebing, Ontario, and have lived in this community for many years.
4. I first became interested in environmental issues while I was in high school and university. During my university years, I became aware of the pollution in Lake Superior, including the discharge of bleach and other pollutants from paper mills into the lake. Over time, I also became familiar with the environmental impacts of mining and of issues related to nuclear waste management.

## II. MY EXPERIENCE IN NUCLEAR WASTE ADVOCACY

5. I first became involved in nuclear issues in the late 1960s and early 1970s when I became aware of nuclear weapons testing being conducted by France in the South Pacific Ocean. In or around 1969, I travelled by ship across the Pacific Ocean and spent time in Tahiti. During this travel, I became aware of concerns regarding the environmental effects of nuclear weapons testing, including concerns about radioactive contamination of fish and aquatic environments.
6. Upon returning to Canada, I became involved in advocacy related to nuclear waste disposal in Northern Ontario. My sustained involvement began in the late 1970s, following the release of a 1977 Federal report commissioned by the Department of Energy, Mines, and Resources, known as the “Hare Report,” which proposed the disposal of nuclear waste in the northwestern region of Ontario. I was particularly concerned by statements in that report suggesting that large areas of Northern Crown land were “not peopled at all.” In my view, this language ignored the presence, land use, and rights of Indigenous peoples, including those within Treaty 3, Treaty 9, and Robinson Superior Treaty Territories.
7. Around this time, the governments of Canada and Ontario directed Atomic Energy of Canada Limited (“AECL”) to develop the concept of deep geological disposal of nuclear waste, and the Federal government requested that the Standing Committee on National Resources and Public Works hold hearings on the Hare Report. In response, I prepared a submission and testified before the Standing Committee in or around 1980. A copy of a

representative media, titled “An Assessment of the Management of Canada’s Nuclear Wastes (The Hare Report)” is attached as **Exhibit ‘A’**.

8. For several decades, I have remained actively involved in nuclear waste advocacy. My involvement has included public education, presentations, conferences, classroom teaching, written submissions, and participation in policy discussions related to nuclear waste, nuclear energy, and environmental protection:

a. Around 1977-1978, I became involved with Citizens’ Committee Studying Nuclear Waste, an organization affiliated with Environment North. Through this work, I participated in public engagement efforts and assisted in drafting and distributing public information materials, including bulletins and newsletters, regarding proposed nuclear waste disposal in Northwestern Ontario. A copy of a representative media is attached as **Exhibit ‘B’**.

b. In July 1979, I participated in and observed public opposition in Atikokan, Ontario, to proposed test drilling associated with nuclear waste disposal. This included a peaceful demonstration by residents of Atikokan and other Northwestern Ontario communities after petitions calling for public hearings and a referendum before test drilling were not acted upon. A copy of a representative media is attached as **Exhibit ‘C’**.

c. In the 1980s, I was actively involved in public discussions concerning nuclear waste management in Northwestern Ontario. This included participating in public debates and televised discussions in communities such as Kenora and Thunder Bay, Ontario, alongside representatives of Atomic Energy of Canada Limited and

Ontario Hydro, with a focus on the safety and long-term implications of nuclear waste disposal.

- d. In 1985, I was involved in public engagement activities related to a municipal Plebiscite Question placed on the ballot in Thunder Bay, asking whether the City should be declared a nuclear weapons-free zone. In October 1986, Thunder Bay passed a municipal resolution declaring the City a nuclear weapons-free zone. I was involved in public education and engagement efforts leading up to and surrounding this resolution. A copy of the related by-law and this resolution is attached as **Exhibit ‘D’**.
- e. Between the 1990s and early 2000s, I participated in and observed open houses, workshops, videos, scoping meetings, and public hearings conducted by the Seaborn Panel, including proceedings held in Thunder Bay. I also made oral and written submissions during public hearings and participated in community-based discussions and municipal processes related to proposed nuclear waste disposal and plebiscites. A copy of an early resolution, where a majority of people were not in favour of nuclear waste disposal in the region, is attached as **Exhibit ‘E’**.
- f. In 2002, the *Nuclear Fuel Waste Act* came into force, and the NWMO was formed. In 2005, the NWMO selected an approach known as “Adaptive Phased Management” for long-term management of nuclear waste. I followed these developments closely.
- g. Between 2010 and 2018, my ongoing involvement with Environment North on nuclear waste issues continued through sustained public monitoring, education,

and engagement, including the preparation of annual reports documenting developments in nuclear waste management in Northwestern Ontario.

- h. From approximately 2019 to present, during a period when the NWMO's site selection process became increasingly focused on Northwestern Ontario communities, I have remained involved in public engagement and education related to nuclear waste management. This involvement includes, but is not limited to, organizing and attending public speaking events, participating in public discussions concerning site selection and transportation of nuclear waste, and contributing to written materials such as media communications, postcards, and resolutions. A representative media release dated in 2023 concerning the transportation of nuclear fuel through Thunder Bay is attached as **Exhibit "F."**
9. Taken together, my long-standing involvement in nuclear waste issues – though not exhaustively described here – has allowed me to observe and identify recurring issues relating to siting, transportation, and long-term management of nuclear waste.

### **III. MY CONCERNS REGARDING THE PROPOSED DEEP GEOLOGICAL REPOSITORY**

#### **A. The Transportation of Used Nuclear Fuel**

10. Based on my experience, the transportation of nuclear waste has long been recognized as a significant risk that cannot be ignored or treated as incidental. For example, derailments, highway accidents, and human error are well documented, particularly in Northern Ontario, where major rail lines and highways connect communities.

11. I am aware that earlier studies and reports, including those dating back several decades, identified transportation as a key issue requiring careful consideration. I have observed a pattern in which transportation risks are deferred or excluded from assessment, with the suggestion that these issues will be addressed at a later stage. In my experience, deferring consideration of transportation risks limits the public's understanding of the full scope of potential impacts associated with nuclear waste disposal.
12. Meaningful public participation, in my experience, requires that transportation risks be addressed openly and transparently, rather than postponed or minimized.

#### **B. The Importance of Meaningful Public Participation and Consultation**

13. Based on my experience, I have observed a significant change over time in how governments and proponents approach public participation in relation to nuclear projects.
14. Earlier processes emphasized broad, visible public participation. Commissions and hearings travelled from city to city and town to town, including communities across Northern Ontario, and heard directly from members of the public. These processes allowed people to express their views publicly, hear differing perspectives, and participate in collective scrutiny of proposed projects. In some cases, sustained public participation contributed to halting or significantly altering nuclear initiatives.
15. In contrast, I have observed that contemporary nuclear waste decision-making is conducted by highly resourced institutions with dedicated professional staff whose role is to advance projects and manage opposition.

16. In my experience, current engagement processes rely less on open public hearings and more on targeted consultations, negotiations with leadership structures, and financial incentives.
17. I have observed that consultation is often directed toward Chiefs and Councils rather than toward community members as a whole. In my view, this differs from earlier processes that sought consent through direct engagement with affected people.
18. I am concerned that the use of financial incentives can create pressure within communities, particularly where economic hardship exists, and can contribute to division within families and communities.
19. As a result, participation today often feels constrained and less capable of influencing outcomes. While formal opportunities to participate still exist, they do not replicate the openness, independence, or public accountability of earlier processes.
20. These concerns are directly relevant to the proposed DGR. In my view, meaningful public participation is essential for a project of this scale, duration, and risk.
21. Meaningful participation, in my experience, involves public forums where people can hear a full range of perspectives, ask questions openly, and understand how their input may influence decisions.
22. Based on my observations over several decades, I do not believe that the current process described in the IPD reflects the level of openness, independence, or public scrutiny that characterized earlier nuclear decision-making.

#### **IV. CLOSING**

23. I make this affidavit to place my experience and concerns on the record for consideration in decisions regarding whether the proposed DGR should proceed through further stages of assessment and review.

AFFIRMED remotely by video conference by **Graham Saunders** of the Municipality of Neebing in the Thunder Bay District of the Province of Ontario, before me at the City of Thunder Bay in the Thunder Bay District in the Province of Ontario on February 4, 2026 in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely.

*Jenna Brunt*

---

Jenna Brunt, LSO #94333B

*Graham Saunders*

---

Graham Saunders

**AN ASSESSMENT OF  
THE MANAGEMENT OF CANADA'S  
NUCLEAR WASTES**

**(The Hare Report)**

SUBMISSION TO THE  
STANDING COMMITTEE ON NATIONAL RESOURCES  
AND PUBLIC WORKS

This is **Exhibit "A"** referred to in the  
Affidavit of Graham Saunders  
affirmed before me over video teleconference  
this 4th day of February, 2026.  
The affiant, Graham Saunders, located in Thunder Bay,  
Ontario, and the commissioner, Jenna Brunt, located in  
Thunder Bay, Ontario.

*Jenna Brunt*

A Commissioner, etc.

Jenna Brunt  
Law Society of Ontario #94333B  
705-471-3509

presented by

CITIZEN'S COMMITTEE STUDYING NUCLEAR  
WASTE WITH ENVIRONMENT NORTH

**PREPARED BY: GRAHAM SAUNDERS**

# BULLETIN

from The Citizen's Committee  
Studying  
Nuclear Waste

May 1/78

The Citizen's Committee Studying Nuclear Waste, Thunder Bay, has now gathered over 15,000 signatures in its appeal for full regional public hearings into the safe disposal of nuclear waste.

Before adjourning for a recess, the Standing Committee on Resources recommended in its interim report continue to study the recommendations of the Hare Report.

The newly formed Committee on Nuclear Issues is holding a series of information meetings across the province which will take place at 7:30 p.m., May 8, at Thunder Bay.

Functioning under the auspices of the Science and Technology Committee is intended to be independent and unbiased on this issue. Committee co-chairman J.M. Harrison, Ontario Minister of Energy, Mines and Resources, will be the main speaker at the Thunder Bay meeting.

The Hare Report advocates permanent disposal of hardrock formations and names N.W. Ontario as the best site.

Only one of the Hare Report's authors, Keith Hare, is not of the nuclear industry. J.M. Harrison, a co-author, was once a deputy minister in the department of Energy, Mines and Resources, while A.M. Aikin, another co-author, is a former vice-president of A.E.C.L..

The Federal government is pro-nuclear. It grants \$100 million annually to A.E.C.L. to produce and sell the CANDU reactor. In contrast, only \$7 million is allocated to researching renewable energy. It isn't too surprising that A.E.C.L. hasn't responded positively to our request for hearings.



Despite no action on our hearings request, we have been effective in our effort to expose A.E.C.L.'s drilling plans. In fact A.E.C.L. has backed off and now intends to drill only at its research establishments this summer.

A.E.C.L. intends to sell 65 CANDU reactors to Ontario Hydro by the year 2,000. To do this without a proven method of safely disposing of nuclear waste is folly.

The real danger to us is in the fact that A.E.C.L., the producer and seller of CANDU, is also the chief researcher into the safe disposal of nuclear wastes. Clearly it is to its advantage to find a "safe" disposal method. Just as clearly, this constitutes a conflict of interest!

The Citizen's Committee Studying Nuclear Waste advocates that:

\*neutral scientists, not AECL, conduct the study into safe waste disposal.

\*in the interim, there be no expansion of the nuclear industry.

\*research and development money be re-directed into renewable resources and technology.

WRITE TO YOUR M.P.'s

Have your group pass resolutions in support of us. Send us a copy so you can add to the weight of public response.

The Citizen's Committee is happy to address any group on this topic. The Citizen's Committee will help in the formation of groups of similar interest.

Financial support is needed: cheques can be made payable to:

This is Exhibit "B" referred to in the

Affidavit of Graham Saunders

affirmed before me over video teleconference

this 4th day of February, 2026.

The affiant, Graham Saunders, located in Thunder Bay,

Ontario, and the commissioner, Jenna Brunt, located in

Thunder Bay, Ontario.

*Jenna Brunt*

A Commissioner, etc.

Jenna Brunt

Law Society of Ontario #94333B  
705-471-3509

PASS IT ON

Next General meeting - 7:30 P.M. Nov.29  
Wesley United Church, Brodie St.

PORTER COMMISSION REPORTS ON NUCLEAR POWER

The Royal Commission on Electrical Power Planning ( Porter Commission ) submitted an interim report on nuclear power to the Ontario government in October. Contained in the report are several recommendations which, while they do not go far enough are a step in the right direction. These recommendations should be pushed with the Ontario Government so they don't get lost in the shuffle. They are:

-Spent fuel reprocessing and advanced fuel cycles should not be part of Ontario Hydro's system planning to the year 2000. Hence, there is no need for a central interim storage facility for spent fuel. All spent fuel should be stored at nuclear generating sites, either in circulating water storage bays or in "dry storage" if this proves feasible.

-Suitable sites for the ultimate disposal of spent fuel and other high-level radioactive wastes should be identified on the basis of both technical and social acceptability. These sites should satisfy the most rigorous geological and ecological criteria. Research and demonstration to these ends should be of the highest priority. Ontario citizens who may be affected in any way should be consulted during all stages of the process.

- An independant review committee should be established to report to the Atomic Energy Control Board on progress on waste disposal research and demonstration. If the committee is not satisfied with progress by 1985, a Moratorium on additional nuclear power stations would be justified.

-The maximum number of additional nuclear stations to the year 2000 should be three.

There are many other important recommendations in the report which should be discussed at the upcoming general meeting.

CITIZEN'S COMMITTEE NUCLEAR INFORMATION TOUR --- Oct. 16 to Oct 26, 1978.

Meetings were organized through local people in the communities of Sioux Lookout, Red lake, Kenora, Fort Frances, Atikokan, Nipigon, Schreiber, and Marathon. In most cases, AECL had been there before us. The people who were present at both meetings stated that ours was much more open and beneficial to the public than AECL's.

Through the use of a slide show and speaking presentation, evidence was presented showing serious technical problems with the present proposals; that nuclear energy is uneconomic, unnecessary and dangerous. Examples of reasonable alternatives were given. The talks were kept as brief as possible, and productive discussion followed, including questions and plans for future strategy.

There was good local coverage in all places( newspaper and/or radio) as well as follow-up in Thunder Bay media.

In Kenora we addressed three high-school classes on public participation in governmental decisions, and in Marathon the meeting was video-taped with a long interview following.

Some results of the tour include: documentary information dispersement, Gordon Edwards appearance at Atikokan, video-tapes for our office, and new contacts in the region.

AGENDA FOR NEXT MEETING -- Wed, Nov. 29, 7:30 p.m.

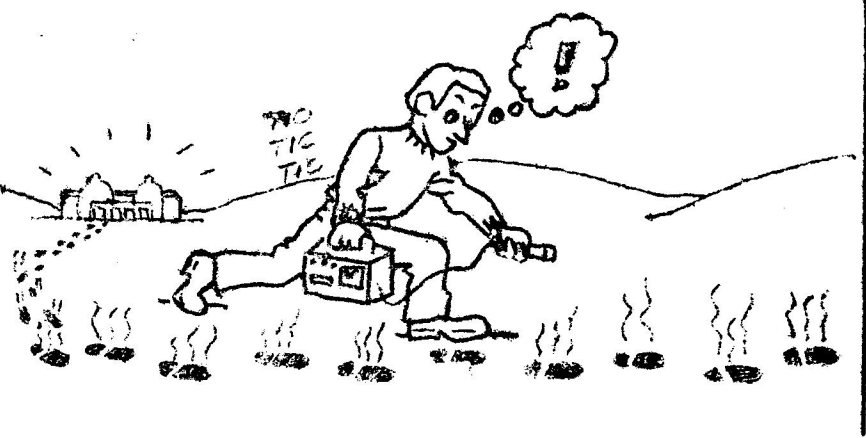
SCOTT ROOM, Wesley United Church, Brodie St. TBF

-Reports on recent activities...questionnaire to candidates, Gordon Edwards at Atikokan.

-office procedures...library, insulation project etc.

-finances... use of money, new funding ...

future program suggestions study sessions Porter commission



An energy-scarce future has led government winner. But what if the winner is also a lot of questions, questions without satisfactory answers. Atikokan put everyone on notice that public opinion is running out.

This is Exhibit "C" referred to in the

Affidavit of Graham Saunders

affirmed before me over video teleconference

this 4th day of February, 2026.

The affiant, Graham Saunders, located in Thunder Bay, Ontario, and the commissioner, Jenna Brunt, located in

Thunder Bay, Ontario.

*Jenna Brunt*

A Commissioner, etc.

Jenna Brunt  
Law Society of Ontario #94333B  
705-471-3509

# "Atikokan is Everywhere"

BY RANDLE W. NELSEN AND GRAHAM SAUNDERS

Until last summer, few people in this country were aware there even was a town in Northwestern Ontario called Atikokan, let alone that it was being chosen to play an important and controversial role in the development of Canada's nuclear industry.

Controversial, because people in northern Ontario today know, from past experience, what can result from close involvement with the nuclear industry. For example, there are the statistics from a study of 90 Elliot Lake uranium miners who died of lung cancer; their average length of work was only three-and-a-half years, and 61 of them had less than the maximum allowable radiation dose according to existing government standards. People pay attention to facts like that.

Then there are more general facts about the industrial-government-crown corporation triangle which currently represents the nuclear industry. Ontario Hydro has overbuilt — 3,400 megawatts of surplus power, 20

percent of the utility corporation's total capacity. Even with current deferrals and cancellations, estimates regarding the cost of Hydro's building plans to its customers run to more than \$7 billion from now until 1983. We have already experienced Hydro rates that have increased by 84 percent during the past five years. What further increases can we expect by the year 2,000, implementing plans for more, unnecessary reactors?

And with what consequences for the people involved? In the case of Elliot Lake, what will the next 20 years of AECL-Hydro partnership bring? There are still no plans to clean up the town — no plans to safely dispose of over 100 million tons of uranium mill tailings which have accumulated there.

It's no wonder that, when the residents of Atikokan heard the term 'nuclear waste and disposal site' being applied to them, they began to react.



THE CORPORATION OF THE CITY OF THUNDER BAY

BY-LAW NUMBER: 240... 1985.....

A By-law to authorize submitting to the vote of the electors at the November, 1985, election the question regarding a nuclear weapons free zone.

WHEREAS the Council of The Corporation of the City of Thunder Bay desires to submit to the vote of the electors the question regarding a nuclear weapons free zone.

NOW THEREFORE THE COUNCIL OF THE CORPORATION OF THE CITY OF THUNDER BAY ENACTS AS FOLLOWS:

1. THAT the following question be placed on the 1985 ballot for the municipal election in November of 1985:

"Are you in favour of declaring the City of Thunder Bay a nuclear weapons free zone?"

2. This By-law shall come into force and take effect upon the final passing hereof.

This is Exhibit "D" referred to in the Affidavit of Graham Saunders affirmed before me over video teleconference this 4th day of February, 2026. The affiant, Graham Saunders, located in Thunder Bay, Ontario, and the commissioner, Jenna Brunt, located in Thunder Bay, Ontario. Jenna Brunt A Commissioner, etc. Jenna Brunt Law Society of Ontario #94333B 705-471-3509

A.D. 1985, as witnessed by the Seal of the Corporation

Handwritten signatures of Martin M. Jasef (Mayor) and D. J. Smith (City Clerk)

Read a First time this 24th day of September, A.D. 1985... Read a Second time this 24th day of September, A.D. 1985... Read a Third time and finally passed this 24th day of September, A.D. 1985...

CITY COUNCIL  
SEPTEMBER 24, 1985

WHEREAS the United Nations has consistently supported the declaration of Nuclear Weapons Free Zones by municipal as well as provincial and federal governments, and

WHEREAS the development of Nuclear Weapons Free Zones has received unanimous support from the Manitoba Legislature, and from the leaders of the major churches in Canada, and

WHEREAS many municipalities in our province and in many countries around the world have adopted the status of Nuclear Weapons Free Zones, and

WHEREAS 81% of the Thunder Bay electorate called for mutual and verifiable nuclear disarmament in the 1982 municipal election, and

WHEREAS 2500 Thunder Bay citizens endorsed a petition requesting that Canada be declared a Nuclear Weapons Free Zone, and

#### REPORTS OF COMMITTEES

##### Corporate and Administrative Services

(Continued)

WHEREAS each and every individual has a right to make known his views on such an important issue,

THEREFORE BE IT RESOLVED that the following question appear on the ballot for the 1985 municipal election:

"Are you in favour of declaring the City of Thunder Bay a nuclear weapons free zone."

CARRIED

WEDNESDAY, OCTOBER 15, 1986 - CITY COUNCIL

THAT the Minutes of the Administrative Services Committee meeting held on September 22, 1986 relative to the Nuclear Weapons Free Zone issue be amended to delete Section two(2) of the resolution regarding referral to the 1987 budget process;

AND THAT the following be added "and that the costs regarding signage be borne by the Peace Coalition," after the word decision in the first paragraph.

MOVED BY	Alderman P. Krause
SECONDED BY	Alderman A. Laakkonen

THAT the Minutes be amended by deferring the resolution pertaining to a Nuclear Weapons Free Zone pending receipt of the solicitors opinion as to its affect on possible businesses coming to Thunder Bay.

LOST

REPORTS OF COMMITTEES (Continued)

Administrative Services Committee (Continued)

MOVED BY Alderman B. Kennedy  
SECONDED BY Alderman D.

Hamilton

THAT the resolution in the Administrative Services Committee Minutes of September 22, 1986 relative to the Nuclear Weapons Free Zone issue be amended to delete Section two(2) of the resolution regarding referral to the 1987 budget process;

AND THAT the following be added "and that the costs regarding signage be borne by the Peace Coalition," after the word decision in the first paragraph.

CARRIED

It was requested that the resolution pertaining to declaring the City of Thunder Bay a Nuclear Weapons Free Zone be voted on separately and that a recorded vote be taken.

MOVED BY Alderman B. Kennedy  
SECONDED BY Alderman D.

Hamilton

THAT the Council of the Corporation of the City of Thunder Bay concur with the wishes of the Plebiscite of 1985 held on Nuclear Weapons and declare the City of Thunder Bay a "Nuclear Weapons Free Zone" and post the appropriate signage at the boundaries of our city to declare this decision;

AND THAT funding for Nuclear Free signage be referred to the 1987 Capital Budget for consideration;

AND THAT the Administrative report on City Signage include recommendations on Nuclear Free sign-posting;

AND THAT the City Solicitor advise on the legality of placing such signage;

AND THAT no nuclear weapons be produces, stored or disposed with city limits.

CARRIED

A recorded vote was requested on the above resolution, the result of which are as follows:

YEA

Alderman D. Hamilton  
Alderman B. Kennedy  
Alderman S. Lysnes  
Alderman D. Miller  
Alderman J. D. Polhill  
Alderman L. Timko  
Alderman J. Vander Wees

NAY

Mayor J. Masters  
Alderman A. Laakkonen  
Alderman J. Ranta

**September 22, 1986 – (ADMINISTRATIVE SERVICES COMMITTEE)**

Nuclear Weapons Free Zone

Mrs. L. MacLeod, Messrs. C. Rose and W. Kent of the Committee to make Thunder Bay a Nuclear Weapons Free Zone appeared before Committee with respect to declaring Thunder Bay a Nuclear Weapons Free Zone.

Various correspondence in support of the deputation to declare Thunder Bay a Nuclear Weapons Free Zone.

A letter from Mr. E. Epp, M.P. relative to the above noted was distributed to the members of Committee for their information.

MOVED BY	Alderman D. Hamilton
SECONDED BY	Alderman D. Miller

THAT the Council of the Corporation of the City of Thunder Bay concur with the wishes of the Plebiscite of 1985 held on Nuclear Weapons and declare the City of Thunder Bay a "Nuclear Weapons Free Zone" and post the appropriate signage at the boundaries of our City to declare this decision;

AND THAT no nuclear weapons be produced, stored or disposed within city limits.

MOVED BY	Alderman D. Hamilton
SECONDED BY	Alderman P. Krause

THAT the resolution regarding funding for Nuclear Free Signage be amended by referring it to the 1987 Capital Budget for consideration;

AND THAT the Administrative report on City Signage include recommendations on Nuclear Free sign-posting;

AND THAT the City Solicitor advise on the legality of placing such signage.

CARRIED

DEPUTATIONS (Continued)

Nuclear Weapons Free Zone (Continued)

MOVED BY	Alderman D. Hamilton
SECONDED BY	Alderman D. Miller

THAT the Council of the Corporation of the City of Thunder Bay concur with the wishes of the Plebiscite of 1985 held on Nuclear Weapons and declare the City of Thunder Bay "Nuclear Weapons Free Zone" and post the appropriate signage at the boundaries of our city to declare this decision;

AND THAT funding for Nuclear Free signage be referred to the 1987 Capital Budget for consideration;

AND THAT the Administrative report on City Signage include recommendations on Nuclear Free sign-posting;

AND THAT the City Solicitor advise on the legality of placing such signage.

AND THAT no nuclear weapons be produced, stored or disposed within city limits.

CARRIED

Alderman A. Laakkonen requested that he be recorded as opposed to the above resolution.

Transportation of Nuclear Waste through Thunder Bay

Memorandum from Mayor K. Boshcoff containing a resolution relating to the transportation of nuclear waste through Thunder Bay, Ontario, noted was placed on Members' desks.

MOVED BY Mayor K. Boshcoff  
SECONDED BY Councillor J. Vander Wees

WHEREAS the citizens of Thunder Bay have expressed their opinion by plebiscite, on November 10, 1997, that they are in favour of nuclear waste disposal in the Thunder Bay area;

AND WHEREAS the City of Thunder Bay, by adoption of By-law No. 201-1997, designated Truck Routes for the transportation of Dangerous Goods through the City via Highway 11/17, Highway 61, Highway 102, Thunder Bay Expressway and the Harbour Expressway;

BE IT RESOLVED THAT the Council of the City of Thunder Bay affirm its concern with the transportation of nuclear waste through the City of Thunder Bay;

AND THAT the Federal Ministers of Transport and Environment, MP's and MPP's be advised accordingly.

CARRIED

This is Exhibit "E" referred to in the Affidavit of Graham Saunders affirmed before me over video teleconference this 4th day of February, 2026.

The affiant, Graham Saunders, located in Thunder Bay, Ontario, and the commissioner, Jenna Brunt, located in Thunder Bay, Ontario.

*Jenna Brunt*

A Commissioner, etc.

Jenna Brunt  
Law Society of Ontario #94333B  
705-471-3509

# MEDIA RELEASE

April 11, 2023

From: Environment North  
[environmentnorth.ca](http://environmentnorth.ca)

## Postcard Warns of Proposed Radioact Transportation Through Thunder Bay

**THUNDER BAY** – Local environmental protection group Er postcards to Thunder Bay postal addresses during the first proposed nuclear fuel waste transport through the city.

“We carefully targeted the postal delivery routes for this mailing,” said Scott Harris, President of Environment North. “If you receive a postcard, it means your home is very near either the proposed highway or railway route for the nuclear fuel waste.”

The postcard campaign is in response to the Nuclear Waste Management Organization’s (NWMO’s) proposal to transport and bury all of Canada’s radioactive nuclear fuel waste at a site south of the TransCanada Highway, 45 km west of Ignace, in the coming years.

The NWMO is a corporation comprised of and controlled by nuclear power companies. The organization proposes to move a projected 120,000 tonnes of radioactive nuclear fuel waste to a deep geological repository site over the course of 50 years – which would involve 2-3 loads a day.

There is no other operating deep geological repository for nuclear fuel waste in the world, and the scale of the proposed transport of the waste is unprecedented.

“I can’t overstate the risks of transporting this highly radioactive waste,” said Dodie LeGassick, Nuclear Lead for Environment North. “Although the loads will travel in strong containment casks, gamma radiation will be emitted constantly. If there is an accident causing a breach of a cask or its immersion in water, the results could be catastrophic. Computer-modelled predictions won’t help those who could be affected.”

Environment North opposes plans proposed by the Nuclear Waste Management Organization to bury all of Canada’s nuclear fuel waste in Northwestern Ontario. The NWMO intends to make its siting decision for the deep geological repository in 2024. Two sites remain in the running: the site in NW Ontario, and a site in South Bruce near Teeswater, Ontario.

More information is available on the websites [environmentnorth.ca](http://environmentnorth.ca) and [nuclearfreenorth.ca](http://nuclearfreenorth.ca).

- 30 -

**Contact:** Scott Harris, President of Environment North, 628-5252

Dodie LeGassick, Environment North Nuclear Lead, 473-9608

This is **Exhibit "F"** referred to in the

Affidavit of Graham Saunders

affirmed before me over video teleconference

this 4th day of February, 2026.

The affiant, Graham Saunders, located in Thunder Bay, Ontario, and the commissioner, Jenna Brunt, located in

Thunder Bay, Ontario.

*Jenna Brunt*

A Commissioner, etc.

Jenna Brunt  
Law Society of Ontario #94333B  
705-471-3509

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**AFFIDAVIT OF KERSTIN MUTH**

---

I, **KERSTIN MUTH**, of the Municipality of Neebing in the Thunder Bay District in the Province of Ontario, **MAKE OATH AND SAY**:

1. My name is Kerstin Muth. I currently perform research and administrative tasks for Environment North, an environmental organization based in Thunder Bay, Ontario.
2. I make this affidavit to share my background, my experience in public education and advocacy related to nuclear issues, and my concerns regarding the Nuclear Waste Management Organization's ("NWMO") Initial Project Description ("IPD") for the proposed Deep Geological Repository ("DGR") for Canada's used nuclear fuel.

**I. BACKGROUND INFORMATION**

3. I was born in Toronto, Ontario, and have lived in both southern and northern Ontario. I am currently based in Neebing, Ontario.
4. My interest in environmental issues began at a young age. I recall becoming aware of pollution and environmental issues while in elementary school, including through educational materials such as the film *Paddle to the Sea*, which left a lasting impression on me. Spending time in nature and later witnessing environmental degradation contributed to the development of my environmental values.

5. I became more actively involved in environmental advocacy after moving to Thunder Bay and, in particular, after meeting my husband in 1995, at which time I began engaging more directly with issues related to nuclear waste management and environmental decision-making.

## **II. MY EXPERIENCE IN NUCLEAR WASTE ADVOCACY**

6. Since becoming a member of Environment North, I have participated in environmental protection and nuclear waste advocacy, primarily in a behind-the-scenes capacity. My work has included research, administrative support, editing, creating posters, newsletters, and media content, and preparation of materials, though at times my work has also been more public-facing.
7. In the mid-1990s, I became involved in public education and advocacy concerning Atomic Energy of Canada Limited's proposed DGR for nuclear waste. At that time, the Seaborn Panel was conducting an environmental assessment of the DGR concept, including public hearings across Ontario, some of which were held in Thunder Bay. I was concerned by the prospect of constructing or operating nuclear power plants without a clear, proven, and publicly accepted solution for the long-term management of nuclear waste.
8. Around this time, a group of individuals who had previously been involved in nuclear waste advocacy in the 1970s and 1980s (many from Environment North) came together to raise public awareness. This group was known, at different times, as People for Nuclear Responsibility or People for Atomic Responsibility. Through this group, I participated in a range of advocacy activities, including preparing posters, assisting with

press releases, writing letters to government officials, and appearing in short informational segments aired on local television stations. True copies of letters dated in March 1999, September 1999, and November 2004 are attached collectively as **Exhibit ‘A’**.

9. One of the group’s key initiatives was advocating for a question to be placed on the municipal election ballot in Thunder Bay regarding public approval of a nuclear waste disposal site in the area. In that plebiscite, approximately 95% of respondents indicated that they did not support a nuclear waste disposal site in the Thunder Bay region. The outcome of that plebiscite reflected the effectiveness of public education and engagement efforts undertaken by community members, rather than a process driven by government or industry outreach. A copy of the related resolution and plebiscite questions are attached collectively as **Exhibit ‘B’**.

10. Over the years, while public attention to the nuclear waste issue has fluctuated, the underlying problems have remained, and new concerns have continued to emerge. This has motivated me to remain engaged in this work. For example, in 2008, I co-authored an article examining the feasibility of nuclear energy in Ontario. In 2011, through Environment North, I submitted comments relating to the Darlington New Nuclear Power Plant Project. A copy of each submission is attached as **Exhibit ‘C’** and **Exhibit ‘D’**, respectively.

### **III. MY CONCERNS REGARDING THE PROPOSED DEEP GEOLOGICAL REPOSITORY**

11. The proposed DGR for Canada's used nuclear fuel matters deeply to me because of the long-term risks it poses to the environment and future generations.
12. My primary concern is that, at some point in the future—whether hundreds, thousands, or tens of thousands of years from now—the repository could fail and result in contamination of the environment. The waste is required to be isolated from the biosphere for extremely long timeframes, yet the IPD does not adequately convey the magnitude of these temporal risks.
13. I am also concerned by how the project is framed as “safe.” While research has improved our understanding of certain issues, significant uncertainties remain, including issues related to corrosion and long-term containment. Safety is a subjective concept, and I am not confident that all risks are being fully communicated to affected communities.
14. The IPD also suggests that the DGR will support climate change mitigation by enabling the continued operation and expansion of the nuclear industry. In my view, this framing is problematic. Addressing the climate crisis requires rapid reductions in greenhouse gas emissions, and the existence of a waste repository should not be used to justify the expansion of nuclear power without a broader public debate.
15. I find it frustrating that discussions about nuclear waste management are consistently separated from discussions about the nuclear energy lifecycle as a whole. Hearings about waste exclude discussion of where the waste comes from and whether more waste should be produced, while hearings about new nuclear facilities exclude discussion of waste. This fragmentation prevents the public from understanding the full scope of impacts and risks.

## **A. The Transportation of Used Nuclear Fuel**

16. The exclusion of transportation from the project's scope is deeply concerning to me.
17. Transportation of used nuclear fuel poses real risks to communities along transportation corridors, particularly in northern Ontario, where routes are limited, weather conditions are severe, and infrastructure can be vulnerable to washouts and closures.
18. By excluding transportation from the scope of the project, communities along these routes are denied meaningful opportunities to understand the risks, identify gaps in planning, and voice their concerns through a transparent and accessible process.
19. While transportation may be reviewed by other regulatory bodies, those processes do not provide the same level of public participation, scrutiny, and holistic assessment as the impact assessment process.

## **B. The Site-Selection Process and the "Informed and Willing Host"**

20. The NWMO describes the project as community-driven and emphasizes the importance of an "informed and willing host." I am not convinced that this standard has been met.
21. In my view, communities are primarily told that the project is safe, without a full and balanced presentation of risks, uncertainties, and long-term consequences. I am concerned about the use of financial incentives and the extent to which they may influence community decision-making. These incentives risk shaping perceptions and contributing to divisions within communities.
22. Further, the focus on only two host communities fails to account for the many other communities that may be affected by the project, particularly those along transportation

routes, who do not have equivalent opportunities to provide input and participate in decision-making.

23. I am aware of an example from Sweden where a host community insisted on receiving comprehensive information about both the benefits and the risks before agreeing to proceed. I am not confident that a comparable level of transparency and critical engagement has occurred here.

### **C. The Importance of Meaningful Public Participation**

24. Meaningful public participation is very important to me and, in my experience, is essential to building trust in environmental decision-making.

25. The Seaborn Panel process, as discussed above, inspired a level of trust because it included independent scientific review, written and oral submissions, and in-person hearings in multiple communities, allowing members of the public to hear a range of perspectives.

26. Public hearings allow people not only to express their own views but also to hear the concerns, critiques, and insights of others. This collective process helps identify gaps, improve project design, or, in some cases, demonstrate that a project cannot meet acceptable standards and should not proceed.

27. In my view, meaningful public scrutiny can strengthen projects where appropriate or prevent harmful projects from moving forward where necessary. Limiting scope and participation undermines these objectives.

## **IV. CLOSING**

28. Based on my experience, I do not believe the current process adequately enables informed decision-making, meaningful public participation, or a full assessment of the long-term social and environmental risks associated with the proposed DGR.

29. I make this affidavit in good faith to share my experience, concerns, and perspectives regarding the proposed DGR and the process through which it is being advanced.

AFFIRMED remotely by video conference by **Kerstin Muth** of the Municipality of Neebing in the Thunder Bay District of the Province of Ontario, before me at the City of Thunder Bay in the Thunder Bay District in the Province of Ontario on February 4, 2026 in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely.

*Jenna Brunt*

---

Jenna Brunt, LSO #94333B

*Kerstin Muth*

---

Kerstin Muth

March 1, 1999

**Kerstin Muth**  
**People for Nuclear Responsibility**  
2-77 College Street  
Thunder Bay, Ontario P7A 5J3  
Fax (807) 767-2490

**Uranium and Radioactive Waste Division**  
**Natural Resources Canada**  
580 Booth Street, Ottawa, Ontario  
Fax (613) 995-0087  
E-mail waste@nrca.gc.ca

### Options for Federal Oversight

Members of our local citizen's organisation, People for Nuclear Responsibility, attended the public hearing regarding "Options for Federal Oversight" held in Thunder Bay, on February 11. We appreciated the opportunity to discuss this and related topics directly with representatives from NRC in the small informal setting.

We agree with the Government of Canada that federal legislation can be the most effective means of ensuring that the three objectives are met. This ensures a more transparent process, considerable public debate and input and increased awareness of the issues amongst members of parliament. The relative strength and longevity of legislation are well worth the time and cost of this process. We briefly discuss the three objectives and recommend additional legislation and review mechanisms to ensure accountability and public confidence.

(1) Dedicated Fund for Waste Management: In order to contribute to the fund nuclear energy producers need to be operating and generating an income. Considering the fact that nuclear energy has been generating nuclear waste for many years, establishment of such a fund is overdue. Such funds should be independently controlled and audited. An annual report should be publicly available. We support the "polluter pays" principle and the government's initiative to establish a secure source of income. The producers and owners require assurance that the fund remains exclusively for the long-term management of nuclear fuel waste. Any private companies interested in taking over the nuclear energy industry in the future would need to be aware of and ready to accept the specific terms of these financial obligations.

This is **Exhibit "A"** referred to in the

Affidavit of Kerstin Muth

affirmed before me over video teleconference

this 4th day of February, 2026.

The affiant, Kerstin Muth, located in Thunder Bay,  
Ontario, and the commissioner, Jenna Brunt, located in

Thunder Bay, Ontario.

*Jenna Brunt*

A Commissioner, etc.

Jenna Brunt  
Law Society of Ontario #94333B  
705-471-3509

(2) Reporting Relationship: A reporting relationship specifically to Environment Canada, the federal Auditor General, and an all party Standing Committee should be included in the legislation. The public should also have access to the information.

Unfortunately, this objective which includes that establishment of a public participation plan, has already excluded the public by ignoring, what we feel to be, the main recommendation of the Environment Assessment Panel. The Panel recommended that the nuclear fuel waste management agency be appointed by the federal government, operate at arm's length from the utilities and have an overall commitment to safety. The Panel recommended this to ensure public confidence, necessary for the approval of a waste disposal plan. The Panel found that little confidence exists among the public in AECL, Ontario Hydro and the AECB in keeping the public well informed and placing safety issues foremost. An independent agency (with safeguards to ensure that it is truly independent) would contribute to ensuring these objectives.

The representation and purpose of the waste management organisation are critical to the entire process. This should be a decision placed before parliament.

3) Federal review and approval mechanism: In this as well as the other objectives we believe the Auditor General has an opportunity to provide accountability. In particular the establishment and management of the dedicated fund for long-term disposal of nuclear waste should be subject to review by the Auditor General. Access to funds should require approval of both an independent agency and the federal Auditor General. There should be legal restrictions on access and use of funds. Funds should be restricted to use for waste management research and long-term management of waste only.

In summary, the success of the management of nuclear fuel waste will depend on public acceptance of a disposal plan. Public confidence in the process will occur if decisions are made with safety as the foremost concern. Legislation of the federal overview mechanisms will assist in establishing confidence. However, if there is conflict of interests public confidence will be drastically diminished. A nuclear waste management organisation representative of the industry will not be viewed as independent and having an exclusive commitment to safety. The federal government wishes to resolve the nuclear waste issue in order to support nuclear energy in particular the Candu option. There cannot be a such a link: the acceptance of a disposal plan does not imply that there is a "solution" to the nuclear waste issue nor does it imply support of nuclear energy.

Sincerely,



Kerstin Muth  
People for Nuclear Responsibility

People for Nuclear Responsibility  
2-77 College St.  
Thunder Bay, ON P7A 5J3

Mayor Ken Boshcoff  
City Hall  
P.O. Box 800  
Thunder Bay, ON P7C 5K4

September 27, 1999

Dear Mayor Boshcoff:

In the next few months Minister Ralph Goodale will be announcing the federal government's strategy for implementing the goals outlined in their policy framework regarding radioactive waste. Legislation of oversight mechanisms is one of the options being considered by the Ministry to ensure the appropriate management of nuclear waste.

People for Nuclear Responsibility, a citizen's group in Thunder Bay, have sent a letter to Minister Goodale (copy enclosed) which outlines our current concerns regarding the management of nuclear waste. We would like to share those concerns with you. In particular, we draw your attention to a key recommendation of the Nuclear Fuel Waste Management and Disposal Concept Environment Assessment Panel, also known as the Seaborn Panel, which has not been met.

Sincerely

Kerstin Muth  
People for Nuclear Responsibility

People for Nuclear Responsibility  
2-77 College St.  
Thunder Bay, ON P7A 5J3

The Honourable Ralph Goodale  
Minister of Natural Resources Canada  
Sir William Logan Building  
Ottawa, ON K1A 0A4

September 27, 1999

Dear Minister Goodale:

In the near future you will be announcing the preferred option for a federal oversight mechanism regarding nuclear waste management. We represent People for Nuclear Responsibility, a citizen's group in Thunder Bay, concerned with nuclear issues. At this time we are primarily concerned with the storage of nuclear waste.

Nuclear issues are not new to many citizens of Northwestern Ontario and they have frequently rejected the associated risks:

- In 1980-81, over 20,000 members of the public in the regions around Atikokan and Thunder Bay signed a petition indicating their disapproval of a potential nuclear waste site to be built near Atikokan.
- 72 % of Thunder Bay citizens participating in a 1985 plebiscite voted in favour of declaring Thunder Bay a Nuclear Weapons Free Zone: this disallows the manufacture, transportation, storage or deployment of nuclear weapons or their components in or through the city.
- The majority of presentations made to the Seaborn Panel in Thunder Bay did not support AECL's proposal to bury waste. This is likely similar to the public hearings held in other locations.
- 1997 plebiscite in Thunder Bay: 95 % did not support burial of nuclear waste in the Thunder Bay area.
- The Anishinabe first nation has indicated that they are not in favour of the storage of nuclear waste on their land.
- Earlier this year, Kenora city council voted against permitting the transport of MOX nuclear fuel through the region.
- Mayors of Sault St. Marie and Sudbury have requested public hearings regarding the transport of MOX nuclear fuel.

In this letter we wish to focus on two major concerns regarding nuclear waste:

- 1) public confidence in the management of nuclear waste and
- 2) the link established by the federal government between resolving the issue of nuclear waste and support of nuclear energy.

The success of a plan for the storage of nuclear fuel waste will depend on public acceptance. The thorough and objective analysis of AECL's disposal concept conducted by the Seaborn Panel outlined the steps necessary in order to establish public confidence in the management of nuclear waste. However, the government has rejected a key recommendation of the Panel. The Panel advised that the nuclear fuel waste management agency be appointed by the federal government, be representative of key stakeholders (e.g. government, electrical utilities and the engineering, science and social science communities) and operate at arm's length from the utilities. Instead your Ministry will permit the producers and owners of nuclear waste to appoint the panel which is to be representative of themselves. The Seaborn Panel found that little confidence exists among the public in AECL, Ontario Hydro and the AECB. A nuclear waste management organization (WMO) representative of the industry will not be viewed as independent and will not inspire public confidence. In addition, the WMO itself is to establish the 'strong and active' advisory council. People for Nuclear Responsibility would like to know the specific terms of reference, including how the council will be selected and what course of action would take place should members of the advisory council and waste management organization disagree?

The supportive position of the federal government toward nuclear energy is apparent. Your Ministry's news release on December 3, 1998, stated that "taking steps to resolve the nuclear waste issue would further support nuclear energy, and particularly the Candu option, as a sustainable supply option for electricity". The following events illustrate how this support is resulting in misrepresentation of information and apparent fast-tracking of one possible storage plan.

On February 10, 1999, Senator Lois Wilson publicly announced that the government has misrepresented one of the Panel's key conclusions. The Panel's conclusion "From a technical perspective, safety of the AECL concept has been on balance adequately demonstrated for a conceptual stage of development..." has been transformed into "the Panel ... found the nuclear fuel waste disposal concept developed by AECL to be technically safe ... but lacks public support". This simplification gives the impression that the disposal plan is safe and merely requires acceptance from the public.

We would like to recommend additional legislation and review mechanisms to ensure accountability and public confidence:

- 1) We believe the Auditor General has an opportunity to provide accountability. In particular, the dedicated fund for long-term storage of nuclear waste should be subject to review by the Auditor General.
- 2) A reporting relationship of the WMO specifically to Environment Canada, the federal Auditor General, and an all party Standing Committee should be included in the legislation. The public should also have access to this information.
- 3) The selection process and representation of the waste management organization are critical to the entire process. This should be debated in parliament.

We would appreciate a response to our concerns as soon as possible.

Sincerely,

People for Nuclear Responsibility

*Kerith M. M. M.* 2-77 College St., Thunder Bay, P7A 5J3

(continued on photocopy)

cc: Honourable David Anderson, MP  
 Honourable David Collenette, MP  
 Honourable Robert Nault, MP  
 Honourable Pierre Pettigrew, MP  
 Honourable Allan Rock, MP  
 Reginald Belair, MP Timmins – James Bay  
 Joe Comuzzi, MP Thunder Bay – Superior North  
 Stan Dromisky, MP Thunder Bay – Atikokan  
 Jocelyne Bujold, MP, Bloc Quebecois Party critic for the Ministry of Environment  
 Rick Casson, MP, Reform Party critic for the Ministry of Environment  
 Serge Cardin, MP, Bloc Quebecois Party critic for the Ministry of Natural Resources  
 David Chatters, MP, Reform Party critic for the Ministry of Natural Resources  
 Yvon Godin, MP, New Democratic Party critic for the Ministry of Environment  
 John Herron, MP, Conservative Party critic for the Ministry of Environment  
 Gerald Keddy, MP, Conservative Party critic for the Ministry of Natural Resources  
 Rick Laliberte, MP, New Democratic Party critic for the Ministry of Natural Resources  
 Mike Gravelle, MPP, Port Arthur  
 Lynn McLeod, MPP, Fort William  
 Ken Boshcoff, Mayor, Thunder Bay

A CTV newscast (Sunday, March 7, 1999) reported that the government plans to "fast-track" the geological disposal plan. This fast-track policy goes against all of the claims of transparency and public participation. The most surprising part of the CTV report was the apparent intention of the government to launch a multi-billion dollar business of storing nuclear waste from other countries. We have had assurances from government representatives including those we spoke with personally at a hearing in Thunder Bay on February 11, 1999, that there is no intention to store nuclear waste from other countries!

Although it is a given that some type of storage plan will be chosen since we have nuclear waste, the government has connected the issue of nuclear waste disposal and support of nuclear energy. There cannot be such a link: the acceptance of a storage plan does not imply that there is a "solution" to the nuclear waste issue nor does it imply support of nuclear energy. For your ministry, resolving the nuclear waste issue supports nuclear energy and promotes many current or future nuclear industries: nuclear energy production in Canada, foreign sales of Candu reactors, sale of nuclear power to the United States (with Canada storing the waste) and storage of nuclear waste from other countries. Our organization believes that the necessity of accepting a plan to manage nuclear waste does not imply support of nuclear energy.

Like the production of nuclear power itself, the role of nuclear energy in our society is complex. This role is changing because of economic reasons and changes in the relationship between society and industry. Nuclear power has not become a normal marketable commodity largely because of the cost and safety issues. Our economic systems cannot easily cope with a system requiring management of such complex technological and public risks. Nevertheless the problems which nuclear energy creates for society has contributed to the introduction of 'long-term sustainability' into public debate. Sustainable development includes the discussion of social choices, making energy resources bear their total social costs, dismantling all industrial and energy installations at the end of their life-cycle and managing wastes for the very long term. At this time there is no proven solution for nuclear waste. We continue to burden our country and other countries (by selling more reactors) with nuclear waste. Instead let us leave a different legacy: of energy conservation, of greater energy efficiency, of continued research into a better solutions for nuclear waste and of greater use of energy derived from renewable resources.

We anticipate your announcement in the coming weeks. We agree with the Government of Canada that federal legislation can be the most effective means of ensuring that the objectives the policy framework are met. This enables a more transparent process, increased awareness of the issues amongst members of parliament and more opportunities for public input.

People for Nuclear Responsibility  
R.R. #1  
South Gillies, ON P0T 2V0

November 15, 2004

Elizabeth Dowdeswell  
President  
Nuclear Waste Management Organization  
49 Jackes Avenue First Floor  
Toronto, Ontario M4T 1E2

Dear Elizabeth Dowdeswell:

Our organization, People for Nuclear Responsibility, is a citizens group in Thunder Bay concerned with nuclear issues. Some of our current members have been involved with nuclear issues for some time. Activities have included a submission to the Government regarding the Hare Report, testimony given at Queen's Park and opposition organized to the test drilling in Atikokan. More recently, our activities have included presentations to the Seaborn Panel in 1997, letters to members of the Federal Government and attending meetings and lectures such as your presentation at Lakehead University earlier this year.

We would like to inform you of our current concerns regarding the storage of nuclear waste produced by nuclear power plants. These include:

#### 1. Amount of Nuclear Waste

Without knowledge of the amount of nuclear waste involved it is difficult to assess the merits of different storage mechanisms. We were glad to see in the Nuclear Waste Management Organization's (NWMO) publication *Understanding the Choices* that other members of the public were concerned about how the volume of waste affects the assessment of choices.

The geological disposal concept presented by AECL to the Seaborn Panel had over ten times the capacity of our own nuclear waste generated to date. I understand that the new proposal made by the Joint Waste Owners is much smaller and has the capacity to hold the proposed amount of nuclear waste, given planned decommissioning, generated by our own nuclear power plants.

Adaptability of any storage/repository option for larger amounts of nuclear waste would imply extensive refurbishing of existing nuclear power plants, new nuclear power plants and/or importing nuclear waste from other countries. We are not in

favour of any developments that would increase the amount of waste that needs to be handled.

The potential import of nuclear waste remains a concern. We would like to see a commitment from the Federal Government that nuclear waste from other countries will not be stored here.

## 2. Problems with Deep Geological Disposal

It is our impression that the Federal Government seems to favour the deep geological repository option. We have a number of concerns regarding the safety of this particular proposal.

The Seaborn Panel concluded that,

“The geological disposal option presented by AECL has been demonstrated to be technically safe for a conceptual stage of development but from a social perspective it has not”.

This statement is often shortened to a statement that implies the proposal has been demonstrated to be technically safe but only requires public acceptance. However, ninety-five technical shortcomings were presented to the Panel in 1995 by the Scientific Review Committee. The NWMO Background Paper *Characterizing the Geosphere in High-level Radioactive Waste Management* states,

“The concerns of the Scientific Review Group and the Seaborn Panel have been addressed by a Second Case Study and more recently by the ongoing Third Case Study.”

I was unable to locate the Second Case Study on the NWMO website. We would like to know the process by which it was decided that the concerns of the Scientific Review Committee have been sufficiently addressed.

## 3. Process and Societal involvement

Transparency and public participation have been very limited in the past with regards to nuclear issues. The new NWMO is following a different path of public inclusion. The website in particular is very helpful in remaining up to date on the proceedings of the organization, obtaining information and providing opportunities for the public to send their comments.

A few shortcomings are still apparent.

A meeting in Timmins with town councillor Gary Scrpnick and the NWMO was not advertised nor made public according to *NorthWatch News*.

A member of our organisation sent an email to the NWMO that included a question on how the public could have better access to opinions of non-partisan experts. They received an unsatisfactory response, one simply thanking them for their thoughts.

The following two comments concern the process by which certain key decisions are made and we would appreciate a response to them.

The NWMO Environment Workshop Report *Development of the Environmental Component of the NWMO Analytical Framework* states,

“In order to address the public’s perception of risk and benefits, new information and new science will be required. ... The public should also decide who they want to perform this new science.“

Many studies are currently underway researching technical aspects of geological disposal and we would like to know if the public was part of the process of selecting who should perform this research.

As discussed earlier, the technical shortcomings of the AECL’s geological disposal concept (as outlined by the Scientific Review Committee) have been judged to be sufficiently addressed by second and third case studies. We are interested in the process of how this judgement was made. Ideally a document detailing how the ninety-five shortcomings have been resolved would be helpful. The selection of experts preparing such a document is very important as the public is interested in technical though unbiased opinions.

#### 4. The Future of Nuclear Energy

Many members of the public have called for a national debate on this issue. Unfortunately it is has not been part of the discussion on nuclear waste disposal.

We anticipate that a national discussion of energy policy, including the role of nuclear energy, will soon be in the forefront. Russia has announced plans to ratify the Kyoto Protocol. The terms of the Protocol will become more binding to countries that have ratified this agreement and Canada will need to develop strategies to reduce greenhouse gases.

Although few greenhouse gases are produced at a nuclear power plant (in comparison with burning of fossil fuels), the entire process, from mining to waste storage does result in greenhouse gas emissions. The entire nuclear fuel cycle needs to be examined from economical, safety and all environmental perspectives. Nuclear power is not a normal marketable commodity, in part because of the incredible cost of managing such technology and the associated public risks. At present no real

“solution” exists for the storage of the waste material. Our societal record for cleaning up even the first stage of the process, the mining and till sites, is poor.

We believe that methods of energy conservation, energy efficiency, building design and renewable energy will be shown to be more economical and better for the environment than nuclear power.

We look forward to attending the information and discussion sessions to be held in Thunder Bay in the coming weeks.

Thank you for your time and response to our questions.

Sincerely,

Kerstin Muth, OD, MSc  
People for Nuclear Responsibility

CC

Lynn Petersen, Mayor of Thunder Bay

Ken Boshcoff, Member of Parliament, Thunder Bay – Rainy River

Joe Commuzi, Member of Parliament, Thunder Bay – Superior North

Bill Mauro, Member of Legislative Assembly, Thunder Bay – Rainy River

Michael Gravelle, Member of Legislative Assembly, Thunder Bay – Superior North

Dr. Frederick Gilbert, President, Lakehead University

Member of Advisory Council, Nuclear Waste Management Organization

Northwatch

COMMITTEE OF THE WHOLE  
JANUARY 17, 2000

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NEW BUSINESS (Continued)

Waterfront Redevelopment Tax Incentive Program (Continued)

AND THAT the Planning Division be directed to prepare Community Improvement Plan, that would enable the implementation of a Waterfront Redevelopment Tax Incentive Program, for submission at a Public Hearing.

CARRIED

Transportation of Nuclear Waste through Thunder Bay

Memorandum from Mayor K. Boshcoff containing a resolution relative to the above noted was placed on Members' desks.

MOVED BY Mayor K. Boshcoff  
SECONDED BY Councillor J. Vander Wees

WHEREAS the citizens of Thunder Bay have expressed their opinion by plebiscite, on November 10, 1997, that they are not in favour of nuclear waste disposal in the Thunder Bay area;

AND WHEREAS the City of Thunder Bay, by adoption of By-law No. 201-1997, designated Truck Routes for the transportation of Dangerous Goods through the City via Highway 11/17, Highway 61, Highway 102, Thunder Bay Expressway and the Harbour Expressway;

BE IT RESOLVED THAT the Council of the City of Thunder Bay affirm its concern with the transportation of nuclear waste through the City of Thunder Bay;

AND THAT the Federal Ministers of Transport and Environment, MP's and MPP's be advised accordingly.

CARRIED

ADJOURNMENT

The meeting adjourned at 9:26 p.m.

This is Exhibit "B" referred to in the  
Affidavit of Kerstin Muth  
affirmed before me over video teleconference  
this 4th day of February, 2026.  
The affiant, Kerstin Muth, located in Thunder Bay,  
Ontario, and the commissioner, Jenna Brunt, located in  
Thunder Bay, Ontario.

*Jenna Brunt*

A Commissioner, etc.

Jenna Brunt  
Law Society of Ontario #94333B  
705-471-3509

RESULTS OF PLEBISCITE QUESTIONS

The following provides the wording of each of the questions included on the ballot and the official results for each:

**Question No. 1**

ARE YOU IN FAVOUR OF nuclear waste disposal in the City of Thunder Bay area?

YES	3,309	NO	36,163
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**Question No. 2**

ARE YOU IN FAVOUR OF City Council approving the establishment and operation of a government regulated commercial casino in the City of Thunder Bay?

YES	14,747	NO	23,462
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**Question No. 3**

ARE YOU IN FAVOUR OF City Council approving the establishment and operation of government regulated charitable casinos in the City of Thunder Bay?

YES	22,115	NO	16,078
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**Question No. 4**

On the question of municipal funding for an acute care hospital, ARE YOU IN FAVOUR OF:  
**(Vote for only 1)**

1. The City of Thunder Bay borrowing up to \$25 million to fund a grant toward construction of a new central acute care hospital with the debt to be repaid through increased property taxes?

20,895

2. The City of Thunder Bay borrowing up to \$17 million to fund a grant toward construction of a renovated acute care hospital with the debt to be repaid through increased property taxes?

6,068

3. No municipal grant toward construction or renovation of an acute care hospital?

12,055

E:\WPDOCS\ELECT97\RESULTS.PLE

# Nuclear energy — is it truly a viable option for this province?

March 22, 2008



cent of electrical supply and the McGuinty government has just confirmed a major expansion.

Environment North remains deeply concerned about the legacy and future of nuclear energy, about the financial and environmental costs as well as the risks to security and safety.

Nuclear energy has left Ontarians in debt and with nuclear waste accumulating at the three reactor sites — Pickering, Bruce and Darlington Generating Stations. The Darlington reactors cost four times the original estimate and were responsible for most of a debt of \$39 billion for Ontario Hydro. The “debt retirement charge” on electricity bills every month is a reminder. Costs of refurbishing aging reactors have consistently gone well over budget and costs of constructing a new plant are tens of billions of dollars.

The nuclear lobby slogan is now “clean and

green” and nuclear energy is promoted as part of the solution for climate change.

However, there are numerous environmental problems including the production of greenhouse gases, primarily carbon dioxide, in the nuclear fuel cycle.

A massive carbon debt has accumulated before a reactor produces its first kilowatt hour. Mining of uranium, milling, refining, transportation and plant construction (concrete and steel) all are carbon intensive processes. Future construction of a waste storage site and final decommissioning of reactors will also make major carbon contributions. Estimates of the amount of carbon emissions associated with nuclear energy fuel cycle are approximately 40 per cent of the emissions of those produced by the natural gas fuel cycle.

Many mine, milling and refinery sites remain toxic and clean-ups delayed. During electrical production small amounts of radioactive substances are released and large quantities of water for cooling are required.

At the end of the cycle is the problem of nuclear waste; safe storage (we hope) for hundreds of thousands of years. No country has demonstrated a real solution to this problem after nearly 50 years of the nuclear power experiment. Canada’s plan is almost certainly geological storage in northern Ontario, at an “estimated” cost of \$25 billion in 2002 dollars.

Is the moderate greenhouse gas saving provided

by nuclear energy worth the costs and risks?

- Nuclear power is dangerous. There is the future risk of more nuclear accidents and weapons as well as nuclear terrorism.

- Nuclear energy is not “clean and green” and produces greenhouse gases.

- Nuclear energy is very costly.

In the past, people in Northern Ontario have contributed to the cost of nuclear power but without benefits. Future power benefits are unlikely but providing a home to the waste is almost guaranteed.

Most of the developed world is rejecting the nuclear option. There are alternative solutions that are safer, less costly, provide economic benefits and address climate change. Organisations such as the Pembina Institute have developed electrical energy mix models for Ontario that phase out nuclear energy and reduce greenhouse gas emissions. These models involve a suite of policy and technological tools that include conservation, energy efficiency, renewable energy co-generation and waste-heat recycling.

Any strategy for electrical power supply needs to be examined carefully in terms of the financial, social and environmental costs of complete energy fuel cycles. Will the Ontario public have the opportunity to choose?

*Kerstin Muth and Bruce Hyer are members of Environment North.*

This is **Exhibit "C"** referred to in the

Affidavit of Kerstin Muth

affirmed before me over video teleconference

this 4th day of February, 2026.

The affiant, Kerstin Muth, located in Thunder Bay, Ontario, and the commissioner, Jenna Brunt, located in

Thunder Bay, Ontario.

*Jenna Brunt*

A Commissioner, etc.

Jenna Brunt  
Law Society of Ontario #94333B  
705-471-3509

ENVIRONMENT north

Box 10  
Thunder Bay, Ont

P7B

www.environmentnor

April 9, 2011

Panel Secretariat, Darlington New Nuclear Power Plant Project Joir  
280 Slater Street  
P.O. Box 1046, Station B  
Ottawa, ON K1P 5S9

Attention Panel Secretariat:

Environment North submitted written comments, dated February 17, 2011, regarding the Darlington New Nuclear Power Plant Project.

I had an opportunity to observe a small portion of the panel hearings and felt they were being conducted thoughtfully, thoroughly and courteously. I also appreciated the regular updates on the daily schedule of presenters and other pertinent information including the notice regarding the opportunity to provide these final comments.

Very briefly Environment North's initial comments were that we are opposed to the construction of two new nuclear power plants on account of the production of nuclear waste and the costs: financial, safety, security and environmental. We believe it is possible to gradually phase out nuclear power over time and develop a sustainable green energy supply.

Many aspects of nuclear energy and alternative energy were raised in the panel discussions. However, we will discuss only two points: a comparison analysis of various energy sources for electricity and support for a royal commission into the future of nuclear energy in Canada.

#### Comparison Analysis of Energy Sources for Electricity

We were pleased about the request from Panel members to obtain a comparison regarding the various energy sources. In fact this is something we suggested in our original comments.

“Environment North suggests that the Ontario government undertake a cost analysis between different energy sources in which the cost of the full fuel cycle, all subsidies, all external costs, and risks are incorporated. We do not believe that nuclear energy would fare favourably in such a comparison.”

We wish to stress that for all sources, all costs of the full fuel cycle be considered, including carbon, other environmental, health, security and “risk” which can be considerable and if not included will not give a true representation of the choices. Some of these costs are difficult to precisely quantify but it is possible to give an approximation of the correct order of magnitude.

This is **Exhibit "D"** referred to in the  
Affidavit of Kerstin Muth  
affirmed before me over video teleconference  
this 4th day of February, 2026.  
The affiant, Kerstin Muth, located in Thunder Bay,  
Ontario, and the commissioner, Jenna Brunt, located in  
Thunder Bay, Ontario.

*Jenna Brunt*

A Commissioner, etc.

Jenna Brunt  
Law Society of Ontario #94333B  
705-471-3509

In the case of nuclear energy the largest costs that are often not included are financial costs for nuclear waste requiring decades of nearly daily transport of fuel bundles, thousands of metal canisters and huge amounts of concrete and steel and, security.

A cost which is frequently underestimated or even ignored for nuclear energy is the carbon cost because greenhouse gases are not generated in the electricity production phase. Greenhouse gas production in the nuclear energy fuel cycle occurs during mining, power plant construction and decommissioning and waste storage. Building new plants will result in a “carbon debt” for many years. Two recent articles which extensively reviewed literature regarding the carbon output of nuclear energy over its life cycle place the current average at 65 g CO<sub>2</sub>equivalent/kWh, about an eighth of the carbon intensity of natural gas. And so carbon output of nuclear energy life cycle provides an advantage over fossil fuels however, it is not negligible.

We look forward to a comprehensive analyses of which the highlights can be condensed to a few pages to make it easily presentable to the public. As indicated during the hearing by a representative from OPG, much comparison work between various energy sources can be found in reports by OPG or to the Ontario Power Authority. We hope that there will be an opportunity for stakeholders to view a draft of the comparison criterion and a draft of initial results in order to identify any significant potential omissions or oversights.

As Mme. Beaudet indicated during the hearings to this comparison will help to “introduce some realism” into the debate. It is true that at times wind and solar are optimistically considered as the simple alternative solution to nuclear. On the other hand they are at times dismissed as insignificant contributions. Their potential is huge but incorporating these resources into the supply mix is challenging and it is certainly not the only change required to replace nuclear energy. It will not be easy to phase out nuclear power however, we believe it is possible. The recent energy mix alternative presented by the Ontario Clean Air Alliance represents a possible scenario. While this scenario may not be a perfect solution, an electricity supply mix without nuclear is a blend of reducing demand and increasing alternative sources and would include:

- more conservation
- more energy efficiency of numerous industrial processes and residential appliances,
- more green building (near net-zero) and green retro-fits on existing buildings,
- improving efficiency of some existing hydro, new hydro,
- development of smart grid,
- more combined heat and power,
- more biomass,
- improved east-west grid,
- more wind
- more solar (including passive, solar thermal: air and water, and photovoltaic)
- some imports of hydro-electricity.

It may even require some retrofitting of existing nuclear facilities as Ontario makes the transition to green energy. These changes will result in many economic opportunities and ultimately, the final goal of a sustainable and clean energy supply.

## Support for a Royal Commission

While the purpose of these hearings were to address the plan to build new nuclear power plants at Darlington, many of the intervenors, including ourselves, were presenting our opinions regarding nuclear energy in general and alternative options. This difficulty of scope is not unusual for hearing processes for varied reasons including the interconnections between various issues. These relatively hearings also attracted a number of intervenors because it is about a specific construction project and it is clear that now is a vital time to voice one's opinion on new nuclear energy plants. I anticipate a similar occurrence in approving a final disposal site for nuclear waste. While there has been opportunity to participate over recent years in the Nuclear Waste Management Organisations consultations, many people will only become more directly involved when the issue is more specific and the question is "Will you allow the construction of a nuclear disposal site in this particular location?".

Panel members asked whether the intervenor had previously participated in the Ontario Government's consultation process regarding the electrical energy supply. While Environment North has not participated in every consultation process regarding nuclear energy issues we have:

1. recently submitted comments to the Provincial Ministry of Energy on the Energy Supply mix. We congratulated their efforts in phasing out coal, increasing supply from renewable energy (primarily hydro, wind and solar), improving energy efficiency and creating a culture of (and providing incentives for) energy conservation. We did not support maintaining the status quo in regards to nuclear energy.
2. wrote a letter to the Chair of the Nuclear Waste Management Organisation (NWMO) regarding the intended volume for the nuclear waste disposal site, sited technological difficulties in the disposal method, aspects process pertaining in particular to the independence of the members of the scientific review group of the NWMO. (2004)
3. wrote a letter to the Minister of Energy supporting legislative oversight of nuclear waste disposal. (1999)
4. made both oral presentations and written remarks to the Seaborn Panel. 1997
5. peacefully demonstrated at a drill site near Atikokan with 75-100 Atikokan and other NW Ontario residents, to protest fact that petitions, totaling 20,000 signatures, asking that public hearings and a referendum precede test drilling, had been ignored. (
6. made a submission to the the Standing Committee on National Resources and Public Works entitled "An Assessment of the Management of Canada's Nuclear Wastes (The Hare Report)" prepared by Citizen's Committee Studying Nuclear Waste (CCSNW) with Environment North.

Environment have has also periodically hosted public information sessions (most recently in 2010), written letters to the newspaper and engaged in other activities to help increase awareness of nuclear issues.

We support Dr. Gordon Edwards and others request for a Royal Commission regarding the future of nuclear energy in Canada.

A Royal Commission on Energy took place in 1957 and the main issue at that time was the construction of an oil pipeline. In the 1980's when federal ministers announced the Nuclear Fuel Waste Disposal Concept Environmental Assessment Panel (the Seaborn Panel) they also committed the government to conduct a parallel review that would put the nuclear fuel waste

question in a broader context. This parallel review has not occurred although provinces and utilities did conduct their own reviews.

A Royal Commission into the future of all aspects nuclear energy would be welcome and appropriate as the issues surrounding nuclear energy affect many citizens in this country. Mining tailing ponds have not been dealt with in Saskatchewan. Nuclear power plants and nuclear waste exist in the three provinces and Alberta has been giving it consideration. Transportation of nuclear waste within Canada, out of Canada or possibly even into Canada (the United States has not had success in finding a suitable repository) affects many Canadians along transportation routes. There are issues pertaining to the plutonium and weapons manufacturing which is not only a Canadian but a global issue. Canadian taxpayers are responsible in the event of any serious accident. The current liability is capped at only \$75 million dollars.

A decision on the future of nuclear energy requires careful consideration of many issues. In the public sphere there are may be some with unfounded fears regarding nuclear energy but many are unaware of all of the consequences of supporting nuclear energy and what other options are available.

I recently had an opportunity to view the film "Into Eternity". It is an documentary that philologically and artistically, explores the difficulties in storing nuclear waste for thousands of years such as how should the site be identified?, should it be identified,? It is difficult for humans to conceptualise the time frames involved. It is filmed primarily at Onkala, the site of the only permanent repository under construction, near Olkiluoto, Finland and features interviews with members of the Finnish and Swedish nuclear industry.

Nuclear energy has consequences for citizens now and for citizens thousands of years in the future. It is time that Canadians consider carefully all of the implications and all of their options.

Sincerely,

Kerstin Muth

Member of Environment North