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Deep Geological Repository for Canada's Used Nuclear Fuel Project  
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**Project reference number: 88774**

Via online submission

**Canadian Nuclear Workers' Council Comments on the Nuclear Waste Management Organization's initial project description for their Deep Geological Repository for Canada's Used Nuclear Fuel Project (Reference No. 88774)**

The Canadian Nuclear Workers' Council (CNWC) would like to submit comments to the Impact Assessment Agency of Canada (IAAC) regarding the Nuclear Waste Management Organization's (NWMO) initial project description for their proposed Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project (Reference No. 88774). The CNWC strongly supports the project.

**Canadian Nuclear Workers' Council**

The CNWC was established in 1993 as a Council of Unions with Members employed in Canada's nuclear industry. Affiliated Unions represent Workers from across Canada's nuclear sector, including: uranium mines and mills, nuclear fuel fabrication, nuclear power plant operation and maintenance, design and engineering, fabrication of components for nuclear facilities, medical isotope production, nuclear research and development, nuclear waste management, and nuclear construction, including refurbishment and decommissioning. This includes the Women and Men employed at the NWMO. CNWC Affiliates also include District Labour Councils in a number of our nuclear host communities.

The goals of the CNWC are to:

- ensure the perspectives of Canada's Nuclear Workers are heard,
- strengthen the collective role of Nuclear Workers via their Unions as partners in Canada's nuclear industry,
- enhance public knowledge about Canada's nuclear industry, and
- share and learn from our experiences.

To achieve these goals the CNWC engages in a number of activities, including the preparation of discussion papers, participation in the regulatory process, publication of a newsletter, participation in various information sharing events, engaging on social media and posting relevant information on our website. We also hold an annual conference at locations that rotate amongst the various communities hosting Canada's nuclear facilities.

The 2022 CNWC conference was held in Hamilton and included a tour of the NWMO's Oakville facility. This provided a valuable opportunity for our Affiliates to tour the NWMO's facility and

discuss their plans for the long term management of Canada's used nuclear fuel and the site selection process for their proposed DGR. Conference participants were clearly impressed by everything they observed.

During the NWMO's site selection process the CNWC hosted information booths at public events in Ignace and Mildmay. CNWC Board meetings have a standing agenda item for updates on this project.

CNWC Affiliates are strong independent Unions with a shared set of values. For all of them, safeguarding the continued health and safety of their Members is a priority. This has led to consistently high standards of occupational health and safety and environmental stewardship across Canada's nuclear industry. We understand that occupational health and safety, public safety and environmental protection are intricately linked. Safer workplaces give rise to safer communities. Nuclear Workers live in our host communities with their families and friends. Safety is paramount for the CNWC, CNWC Affiliates and their Members. That guiding principle will encompass this project.

Canada's nuclear industry has a long history of safe operations in Canada. We depend on nuclear energy in Canada for clean and reliable electricity and our demand for that carbon free electricity is forecast to grow dramatically. That increasing demand will require the construction of new nuclear power plants. Critics of nuclear energy frequently raise their concerns about the hazards associated with used nuclear fuel and the lack of a long-term management plan. That used fuel is all being safely managed today and the NWMO's plan ensures it will continue to be safely managed for the long-term and isolated in a DGR. The need for the DGR is clear. Other jurisdictions have reached the same conclusion.

The economic benefits of our nuclear industry generally and the DGR are significant. The DGR will create and sustain good, unionized jobs and deliver economic benefits for the local economy and the Country. CNWC Affiliates represent the majority of the highly skilled workers employed in Canada's Nuclear Industry, including the Nuclear Waste Management Organization. Long-term, skilled jobs help support our communities.

We are deeply invested in the long-term sustainability of Canada's nuclear industry. High standards for safety, environmental protection, and public engagement benefit all of us. The CNWC strongly supports the proposed DGR Project.

The CNWC is a regular participant in the regulatory process and will continue to engage with the IAAC and the Canadian Nuclear Safety Commission through the lifecycle of the DGR Project. The CNWC urges the IAAC to advance the Project to the next phase of assessment.

**Respectfully submitted,**

Robert Walker  
National Director  
Canadian Nuclear Workers' Council