



**We the Nuclear Free North** is an alliance of Indigenous and non-Indigenous people and groups opposed to transporting, processing, burying and abandoning highly radioactive nuclear waste in Northwestern Ontario. The Alliance has been working together for the past six years to share information about the risks and realities of the Nuclear Waste Management Organization's proposed deep geological repository for all of Canada's high-level nuclear fuel waste.

In 2020 the NWMO focussed their investigation on two remaining candidate sites: the Teeswater site in South Bruce in southwestern Ontario and the Revell site between Ignace and Dryden in northwestern Ontario. In November 2024 the NWMO announced that it had selected the Revell site between Ignace and Dryden and began referring to the site as the "Wabigoon Lake Ojibway Nation – Ignace" site.

Just weeks before the NWMO announcement that it had selected the Revell site in the heart of Treaty 3 territory Treaty 3 Chiefs in Assembly passed a resolution expressing their continued opposition to the NWMO's project and investigations in Treaty 3 territory. Strong resolutions in opposition have also been passed by Nishnawbe Aski Nation, Anishnabek Nation and the Chiefs of Ontario.

We have many concerns about the project and the NWMO's method of selecting the site and their site selection, but our comments will focus on the Impact Assessment review process which began on January 5<sup>th</sup> and the NWMO's "initial project description". The Canadian Environmental Law Association has also filed a submission on behalf of We the Nuclear Free North which we adopt as an addendum to these comments.

Our comments are:

- The project must be the subject of a full impact assessment including a public hearing, and the Impact Assessment Agency must ensure that the public is able to participate in a meaningful way through each step of the process.
- The 30-day comment period is too short. Many people who are concerned about this project, including the transportation of the radioactive waste to the site, will not have even heard about the comment period and for those of us who were alerted to the comment period it is a very short period of time to comment on the initial project description. This is an important project that will have impacts far, far into the future. The review process must be thorough and allow public participation, and a 30-day comment period works against that.
- The project description is poorly done and leaves out important information about the project. For one, the NWMO is trying to persuade the Impact Assessment Agency that

transportation can be left out of the review after describing transportation as part of their project for more than twenty years.

LONG-DISTANCE TRANSPORTATION MUST BE INCLUDED IN THE PROJECT REVIEW.

- The NWMO also provides too little information about project activities, including those project activities that pose radiological risk for the workers and for residents in the area and downstream from the project site. For example, there is not enough information about the Used Fuel Packaging Plant, how the wastes will be transferred into the underground and placed in the emplacement rooms, how the containers will be monitored after they are underground, and how they will be retrieved or repaired in the event of a container failing.

THE NWMO MUST BE REQUIRED TO PROVIDE A DETAILED PROJECT DESCRIPTION.

The following issues must be addressed in detail by the NWMO in future impact assessment documents:

- Long-Term safety.
- Transportation
- Emergency response and evacuation plans
- Accidents
- Malevolent acts / Security
- Health, including Worker and Occupational Health Transportation
- Use fuel packaging plant)
- Concurrent placement of wastes in underground chambers while construction is ongoing
- Monitoring through operational, closure and post closure stages
- Climate considerations and estimates of climate impacts
- Radioactivity and estimates of radioactive releases from various project activities over various time frames and assessing those effects (largely just ignored)
- Water “management” including: pumping of groundwater from the underground (volumes, contamination, storage, treatment, release) and water from the used fuel packaging plant (volumes, contamination, storage, treatment, release)
- Alternatives to the project (e.g. continued on-site storage)
- Alternative means (of carrying out the project)
- The project description states that access (to the site) will be limited: will Tower Road and Dymont Road (currently used extensively by the public) be gated or decommissioned? will the canoe route through the area be blocked or restricted? will hunting and fishing and foraging in the area be disallowed? If so, for what area?

The following resolutions have been passed by municipalities, Indigenous organizations and First Nations and civil society organizations:

## **Resolutions Opposing the Generation, Transportation and Burial of Nuclear Waste**

### **2026**

[\*\*Township of Dubreuilville Resolution\*\*](#), urging the federal government to direct the owners of high-level nuclear waste (Ontario Power Generation, Hydro Quebec and New Brunswick Power) to establish secure storage solutions for the nuclear waste in the vicinity of their reactor stations where the waste has been generated and is currently stored, as an alternative to the NWMO project; and that the federal government ensure that the impact assessment and regulatory and licensing processes for the NWMO project are comprehensive and include the impacts and risks of nuclear waste transportation and processing, and the long-term safety of the project, including alternative means of carrying out the project activities including nuclear waste transfers, transportation and processing.

### **2025**

[\*\*Chiefs of Ontario Resolution\*\*](#) from their Fall Assembly expressing opposition to the transportation and burial of radioactive waste.

[\*\*Anishinabek Nation's Resolution\*\*](#), from their Fall Grand Council Assembly (*ANISHINABEK GIMAAG-MAAWNJIIDIWAAD*), NAAKNIGAN – #2025 – 25, concerning Nuclear Waste Transportation and Burial in Anishinabek Nation Lands, restating opposition to the transportation and burial of radioactive wastes including the transportation of high-level nuclear fuel waste through their territories.

### **2024**

[\*\*Northwestern Ontario Women's Centre Resolution\*\*](#), urging the Nuclear Waste Management Organization to establish secure storage solutions for nuclear waste in the vicinity of the reactor stations where the waste has been generated and is currently stored and to not pursue the transport, burial and abandonment of these radioactive wastes.

**Eagle Lake First Nation opposes NWMO project, launches lawsuit – see news articles:**

Dec. 27, 2024 – [\*\*Eagle Lake First Nation Challenges NWMO in Court\*\*](#)

Jan. 16, 2025 – [\*\*Eagle Lake First Nation Has a Bone to Pick with NWMO\*\*](#)

[\*\*MiningWatch Canada Resolution\*\*](#), urging the Nuclear Waste Management Organization to establish secure storage solutions for nuclear waste in the vicinity of the reactor stations where the waste has been generated and is currently stored and to not pursue the transport, burial and abandonment of these radioactive wastes.

**Grand Council Treaty #3 Chiefs-in-Council Resolution CA-24-14: “Position on Nuclear Waste and Resource Development in Treaty #3”**, “continuing support for the Elders’ Declaration CA-11-14 that makes clear that a Deep Geological Repository for the storage of nuclear waste will not be developed at any point in the Treaty #3 Territory.”

**12 First Nations’ open letter against nuclear waste storage near Ignace** (Sept. 30, 2024): Asubpeeschoseewagong Anishinabek (Grassy Narrows First Nation), Kitchenuhmaykoosib Inninuwug (Big Trout Lake First Nation), Wapekeka First Nation, Neskantaga First Nation, Muskrat Dam First Nation, Ojibways of Onigaming, Gull Bay First Nation, Wauzhushk Onigum Nation, Fort William First Nation, Netmizaaggamig Nishnaabeg, Shoal Lake 40 First Nation, Gakijiwonong Anishinaabe Nation.

**Ojibway Nation of Saugeen # 258 Band Council Resolution** regarding the Nuclear Waste Management Organization Proposal to Transport, Bury and Abandon High-level Nuclear Waste in a Deep Geological Repository and the NWMO Investigations in Treaty #3 Territory (July 15, 2024)

**Red Rock Indian Band – Band Council Resolution**, resolving that the Red Rock Indian Band does not consent to the NWMO’s plan to transport nuclear waste through ou territory.

**Conmee Township resolution** urging the Nuclear Waste Management Organization to find storage solutions for nuclear waste in the vicinity of the reactor stations where the waste is and not pursue the transport of these radioactive wastes to Northern Ontario.

**Netmizaaggamig Nishnaabeg (Pic Mobert First Nation) resolution** “opposing any proposed NWMO operations in Netmizaaggamig Nishnaabeg’s unceded lands, including transportation of wastes to the proposed Deep Geological Repository at Ignace. WE STILL SAY NO TO NUCLEAR WASTE!”

**Anishinaabeg of Kabapikotawangag Resource Council (AKRC) Declaration of Opposition to NWMO Nuclear Waste Site**

**Environment North Resolution** urging the Nuclear Waste Management Organization to find storage solutions for nuclear waste in the vicinity of the reactor stations where the waste is and not pursue the transport of these radioactive wastes to Northern Ontario.

**Thunder Bay & District Injured Workers Support Group Resolution** urging the Nuclear Waste Management Organization to find storage solutions for nuclear waste in the vicinity of the reactor stations where the waste is and not pursue the transport of these radioactive wastes to Northern Ontario.

**Township of Sioux Narrows – Nestor Falls Resolution** urging the Nuclear Waste Management Organization to find storage solutions for nuclear waste in the vicinity of the reactor stations where the waste is and not pursue the transport of these radioactive wastes to Northern Ontario.

[Manitoba Energy Justice Coalition Resolution](#) urging the NWMO to establish secure storage solutions for nuclear waste in the vicinity of the reactor stations where the waste has been generated and is currently stored and not pursue the transport to and disposal of these radioactive wastes in Northern Ontario.

[Township of Nipigon Resolution](#) urging the Nuclear Waste Management Organization to find storage solutions for nuclear waste in the vicinity of the reactor stations where the waste is and not pursue the transport of these radioactive wastes to Northern Ontario.

[Township of Red Rock Resolution](#) urging the Nuclear Waste Management Organization to find storage solutions for nuclear waste in the vicinity of the reactor stations where the waste is and not pursue the transport of these radioactive wastes to Northern Ontario.

[Township of La Vallee Resolution](#) urging the Nuclear Waste Management Organization to find storage solutions for nuclear waste in the vicinity of the reactor stations where the waste is and not pursue the transport of these radioactive wastes to Northern Ontario.

**Lac Seul First Nation** – [Chief and Council’s Position on Nuclear Waste Storage](#) (no support for nuclear waste storage)

[Asubpeechoseewagong Netum Anishinabek \(Grassy Narrows First Nation\) letter](#) to Laurie Swami, President and CEO of NWMO, opposing burial of nuclear fuel waste “in our Territory, in our region, or anywhere upstream or upwind of our Territory”.

## **2023**

[Assembly of First Nations Resolution # 37](#) Opposition of Nuclear Technology, Waste, Transport and Storage

[Ojibway Nation of Saugeen # 258 Resolution](#) regarding the Nuclear Waste Management Organization Proposal to Transport, Bury and Abandon High-level Nuclear Waste in a Deep Geological Repository in Treaty #3 Territory, August 2023

## **2022**

[Fort William First Nation Resolution](#) on Nuclear Fuel Waste Transportation and Burial in Northwestern Ontario, Sept. 2022

[Nishnabe Aski Nation Resolution](#) opposing NWMO’s proposed deep geological repository near Ignace, August 2022

[Chapples Twp Resolution](#) supporting the efforts of We the Nuclear Free North, June 2022

**2021**

[Chiefs of Ontario Resolution](#) on Alternatives to Nuclear Energy

[Wolastoq Grand Council Resolution](#) on Nuclear Reactors & Waste

**2020**

[Joint Declaration on Radioactive Waste Transport and Abandonment](#) (updated)

**2019**

[Gillies Township Resolution](#) urging NWMO to find storage solutions for nuclear fuel waste near the originating reactor sites

**2018**

[Ontario Chiefs Resolution](#) against new nuclear reactors, November 2018

[Assembly of First Nations Resolution #62](#) against New Nuclear Reactors

[232 Resolutions Passed](#) Against OPG's Deep Geological Repository

**2017**

[Joint Declaration between the Anishinabek Nation and the Iroquois Caucus](#) on the transport and abandonment of radioactive waste

[Assembly of First Nations Resolution # 48](#) on Nuclear Waste

[Open Letter from 104 Great Lakes Mayors](#) Opposing Burial of Low and Intermediate Level Waste

**2011**

[Lac Seul First Nation Resolution](#) Against Nuclear Waste Storage Initiatives within Lac Seul Traditional Territory

**2012**

[Nuclear Waste Watch Position Statement](#) – November 2012

**2010**

[Grand Council Treaty 3](#) Letter of Opposition

**2009**

[Nishnabe Aski Nation](#) Resolution

[We Are the Land, Chiefs of Ontario](#) Declaration

**2005**

[City of Temiskaming Shores Resolution](#)

**City of North Bay Resolution**

**2004**

Charlottetown Declaration, Nuclear Waste Watch

**2000**

City of Thunder Bay Resolution, affirming its concern with nuclear waste transport through the City, following on the 1997 plebiscite in which 92% of voters voted “No” to the question, “Are you in favour of nuclear waste disposal in the City of Thunder Bay area?”

**1985**

City of Thunder Bay Nuclear Weapons Resolution

APRIL 2024 – Household Mailer Sent by We the Nuclear Free North to the residents of Ignace

# IGNACE: IT IS YOUR DECISION TIME.

On March 18 the Township of Ignace signed a “hosting agreement” with the Nuclear Waste Management Organization. The agreement will come into effect as a **binding contract** between the NWMO and the Township of Ignace if or when the Township delivers a statement to the NWMO that Ignace is a “Willing Host”.

Between April 26 and April 30, an online poll is open for Ignace residents to “vote” on whether they “want the Township (of Ignace) to continue participating in the (NWMO) process and to proceed as a potential host community”.

**It’s a package deal.** Voting “yes” means Ignace stays in the NWMO siting process and commits to supporting the NWMO’s nuclear waste burial project but it **ALSO** means agreeing to all the obligations and surrendering of rights set out in the “hosting agreement” which has already been signed by the Township of Ignace. The hosting agreement would become a permanent and binding contract if the NWMO selects the Revell site between Ignace and Dryden for the DGR.

The Hosting Agreement is posted on the Ignace website at <https://www.ignace.ca/town-hall/willingness-dgr-process>. It’s long, but it is important to read it before you vote.

Here’s some of what we found in the March 18 agreement:

- it **binds future municipal councils**; elections and changes of councils won’t change the obligations the Township has signed up for with the March 18 hosting agreement
- it requires future councils to show up at the request of the NWMO at meetings, forums and hearings and speak in support of the project, **regardless of future concerns** or how future residents and councils view the project
- information about the implementation of the project will be **confidential**, limited to a very few; this includes scientific and technical information about the project and its impacts
- even communications from the municipality to its residents – that’s you – will be **subject to the approval of the NWMO**
- it commits the Township to providing support and services but **does not commit the NWMO to paying** for them.

The Nuclear Waste Management Organization intends to select a single site for a deep geological repository (DGR) for all of Canada’s high-level radioactive waste. The project will include transporting, processing, burying and eventually abandoning the highly radioactive wastes at the chosen site.

There will be radioactive releases during each of these sets of activities even without an accident. The project will bring new security concerns into the region. The effects of radiation affect us at a cellular level and can cause harm that shows up decades later and is passed on to our children and grandchildren.

The nuclear industry in Canada has been promoting the idea of nuclear waste burial for decades but the NWMO has not produced a detailed plan. In 2021 they published a “concept report” but important parts of the project are still not described or tested. There is no deep geological repository for high-level nuclear waste approved or operating anywhere in the world (DGR’s in Finland & Sweden’s are under review and do not have a licence to operate).

**VOTING IS IMPORTANT. REGISTER AT WWW.YOURCHOICEIGNACE.CA.**

CALL THE CONSULTANTS AT 1 807 697 0565 FOR HELP WITH THE VOTING PROCESS.

The consultants *With Chéla* will be at the Ignace arena from April 26-30 and can help you vote in person if you don’t have a computer. Call them at 1 807 697 0565 for help or to confirm the hours they will be at the arena.

**A note for those who are thinking of abstaining: maybe you don’t trust the process or you are still undecided about how you want to vote. Abstaining will have the same effect as a “yes”. If you are uncertain, vote “no”.**

*This message is coming to you from your friends and neighbours with We the Nuclear Free North. You can reach us online at [www.wethenuclearfreenorth.ca](http://www.wethenuclearfreenorth.ca), email us at*



# WHAT'S THE PROBLEM WITH THE NWMO'S "WILLINGNESS" PROCESS?

## WHAT'S THE PROBLEM WITH THE NWMO'S "WILLINGNESS" PROCESS?

The Nuclear Waste Management Organization says it will only proceed with the selection of a site for their deep geological repository project where there is an "informed and willing community".

But the question of "willingness" is being asked **before you have answers** you need about the NWMO project.

- The NWMO's "plan" to transport, process and bury high-level nuclear waste is not a complete plan. It includes several "concepts" that are still being developed, and there are large gaps in the information available about the project. **How can residents be informed about a plan that hasn't been fully made?**
- The NWMO's siting process requires that the community decide it is "willing" **before it gains important information through the federal impact assessment**, which is the public review process to assess the potential positive and negative effects of proposed projects, with input from experts and other stakeholders, including the public and potentially affected residents
- To vote in the online poll between April 26<sup>th</sup> and 30<sup>th</sup> you must be a resident or property owner in Ignace, but **the project puts many others at risk**: those living along the transportation route and those living downstream, including those living closer to the Revell site than residents of Ignace. Ignace is 45 km away and in a different watershed. Shouldn't those who share the risk share in the decision? Can a community be "host" to a project 45 km away?

## Seven reason to vote NO (you might have more!)

**VOTE NO** If you are uncertain about the project or about the hosting agreement; if you say 'yes' the decision is permanent and irrevocable, there will not be a second chance

**VOTE NO** If you think the hosting agreement doesn't give a fair deal for Ignace, either in financial benefits or making sure that the NWMO will pay their fair share

**VOTE NO** If you believe that future municipal councils and residents – including you – should have the same democratic rights that you and the current council have today

**VOTE NO** If you are concerned about several trucks per day hauling high-level radioactive waste on northern highways, including Highway 17 as it passes through Ignace

**VOTE NO** If the radioactive releases from transportation packages, the used fuel processing plant and the deep geological repository and their impacts on human health and the environment concern you

**VOTE NO** If you are concerned about the risk of a catastrophic accident or the transports or DGR site being a military target

**VOTE NO** if you believe it is an intergenerational injustice to burden people not yet born with the impacts caused by burying radioactive waste

**VOTE NO** If you believe your friends and relatives and others along the transportation route and in the vicinity of the project and downstream - the people who share the risks - should also have a say

LET'S TALK ABOUT IT!  
**WEDNESDAY, APRIL 24 AT 6 PM CENTRAL.**  
**Details are at [decision2024.ca](http://decision2024.ca)**

TUNE IN FOR AN ONLINE DISCUSSION ABOUT THE MARCH 18 IGNACE HOSTING AGREEMENT AND THE APRIL 26-30 ONLINE POLL FOR RESIDENTS OF IGNACE. YOU CAN ALSO ASK QUESTIONS ABOUT THE NWMO PROJECT.

Go to [decision2024.ca](http://decision2024.ca) for the registration link, details about how to join or how to watch a livestream of the webinar and for more links and information. Or call *We the Nuclear Free North* at 1.855.225.8055