

Comment on the Draft Integrated Tailored Impact Statement Guidelines for the Deep Geological Repository for Canada’s Used Nuclear Fuel, April 10, 2026

Dr. Peter C. van Wyck
Professor of Communication Studies
Concordia University, Montréal
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The April 10 draft package makes an important correction to NWMO’s earlier effort to treat off-site transportation as external to the project. The draft integrated tailored impact statement guidelines now require that “transportation of both nuclear and non-nuclear materials outside of the project site” be included among the project components and activities considered in the Impact Statement, and they state that project-related transportation has the potential to result in adverse effects within areas of federal jurisdiction.¹ That change should be retained in the final guidelines.

What the package does not yet do is say clearly enough what follows from that change.

The same draft guidelines also state that the roads and highways on which used nuclear fuel, construction materials, and personnel would travel are under provincial and municipal jurisdiction and “are not included in the impact assessment as it is outside of IAAC’s mandate.”² At the same time, the summary of the draft guidelines points explicitly to transportation effects along Highway 17 between Ignace and Dryden, including traffic and safety, strain on infrastructure and emergency services, and school transportation routes and intersections.³ It also requires the updated Preliminary Transportation Plan to describe the measures and processes the proponent would apply anywhere transportation activities take place.⁴ The result is an

¹ Impact Assessment Agency of Canada and Canadian Nuclear Safety Commission, *Draft Integrated Tailored Impact Statement Guidelines* (10 April 2026) at ss 4.1, 10.

² *Ibid* at s 10.2.

³ Impact Assessment Agency of Canada and Canadian Nuclear Safety Commission, Summary of the Draft Integrated Guidelines (10 April 2026), Transportation section.

⁴ *Ibid*, section addressing the updated Preliminary Transportation Plan.

unresolved inconsistency. Transportation is back in scope as project activity, but the corridor through which that activity will actually move remains only partially in view.

That ambiguity matters because this is not a local access-road issue. It is a vast transportation undertaking built into the project from the beginning. The repository depends on moving used fuel and other project-related materials across shared public corridors, over many decades, toward a single destination in northwestern Ontario. The registry project description itself states that the project is expected to span approximately 160 years.⁵ For a project whose transportation burden will be national in scale and generational in duration, a partial or internally inconsistent treatment of corridor effects is incompatible with the Act's requirements of fairness, scientific integrity, thoroughness, accuracy, precaution, and respect for Indigenous rights.⁶

The final guidelines should therefore make one point explicit. IAAC need not assess or regulate the provincial highway network in the abstract. But the effects of project-related transportation on and along that corridor should be clearly within scope wherever they may cause adverse federal effects, affect Indigenous rights, or place burdens on local and regional services and infrastructure. At the moment, that distinction is only partially articulated. It needs to be stated directly.

For a project of this scale and consequence – unprecedented in the Canadian context and certain to be watched internationally – it is imperative to get the transportation scoping right at the outset. This is one of the few moments in the process when structural weaknesses can still be corrected before they harden into the assessment itself. Canada has an opportunity here to set a high standard. The final guidelines should reflect that.

This clarification is necessary for several reasons.

⁵ Impact Assessment Agency of Canada, *Deep Geological Repository for Canada's Used Nuclear Fuel Project*, online: Canadian Impact Assessment Registry, under project description.

⁶ *Impact Assessment Act*, SC 2019, c 28, s 1, s 6.

First, the generic requirements already adopt a broader study-area logic. They require project, local, and regional study areas, and define the regional study area as the larger area where cumulative effects may occur.⁷ The transportation language should be brought into alignment with that broader framework. Otherwise, the final guidelines risk reproducing in practice the same narrow site-based scoping logic that NWMO advanced earlier in the process.

Second, transportation is inseparable from Indigenous rights and jurisdiction along the route. The Indigenous Engagement and Partnership Plan identifies several Indigenous Nations and communities facing a medium to high likelihood of potential impacts on rights, and the draft guidelines require the Impact Statement to assess project effects on those rights in light of the conditions that support or limit their exercise.⁸ If transportation effects outside the immediate site are real, then rights-bearing Nations along the corridor cannot be treated as procedurally secondary simply because NWMO is not constructing new road infrastructure through their territories. Transportation is not only a logistics issue. It is also a rights and jurisdiction issue.

Third, transportation cannot be severed from the human-environment provisions. The draft guidelines require assessment of health, social and economic conditions, pressure on services and infrastructure, community safety, and the effects of transient workers, including gender-based violence.⁹ Those are not separate from the transportation question. They are among the principal ways transportation will be experienced in corridor communities. If the final guidelines do not connect transportation more clearly to those human-environment requirements, corridor burdens risk being fragmented administratively and weakened in practice.

⁷ Impact Assessment Agency of Canada and Canadian Nuclear Safety Commission, *Generic Requirements for the Preparation of an Impact Statement* (10 April 2026), section addressing study areas.

⁸ Impact Assessment Agency of Canada and Canadian Nuclear Safety Commission, *Draft Indigenous Engagement and Partnership Plan* (10 April 2026); Impact Assessment Agency of Canada and Canadian Nuclear Safety Commission, *Draft Integrated Tailored Impact Statement Guidelines* (10 April 2026) at s 8.

⁹ Impact Assessment Agency of Canada and Canadian Nuclear Safety Commission, *Draft Integrated Tailored Impact Statement Guidelines* (10 April 2026) at s 7.

For these reasons, the final guidelines should be revised to clarify that project-related transportation effects along and across the corridor are within scope wherever they may affect Indigenous rights, health, social and economic conditions, emergency preparedness, public safety, or cumulative effects. The April 10 package takes an important step by recognizing off-site transportation as part of the project. But it still leaves a gap between recognizing transportation as part of the project and assessing the corridor through which that transportation will occur. That is the gap that now needs to be closed.