

Concerns Regarding the Summary of Issues prepared by the Impact Assessment Agency of Canada regarding the NWMO Proposal for a Deep Geological Repository for High-Level Nuclear Waste (HLW)

Prepared by the International Physicians for the Prevention of Nuclear War Canada

April 18, 2026.

The summary of issues has included many of the concerns that we have previously shared with by email, Feb 2, 2026 in response to your call for public comment. We applaud that you have included the challenge of transportation among the issues you have asked the NWMO to address.

The summary is silent on the need for an independent public health assessment of this important project. To refresh our concern on this matter, I will repeat, below, what we have previously shared.

In addition, we continue to be concerned as to how the amount of waste that will be stored at this facility will be capped at the level that is proposed. Given the accelerating expansion of the nuclear industry in Canada and the absence of a DGR in the USA, there will be increasing volume of HLW and resultant pressure to use this facility, if it is eventually built. This is another question that needs to

be addressed in the proposal by NWMO and should be added to the summary of issues.

Protecting Public Health

“The legal responsibility for public health at the proposed site lies with the Province of Ontario, under the Health Protection and Promotion Act, R.S.O.1990, First Nations traditional law and the Public Health Agency of Canada Act. This legal framework is not described in any detail in the initial project description. Neither Ontario Health nor First Nations traditional law is listed among the regulatory authorities in the proposal. This raises the concern that there has not been an independent comprehensive assessment of the impact on public health. The modus operandi of public health is to use the precautionary principle when faced with a situation where threats and risks are unknown, but where consequences could be significant. Such perspectives need to be highlighted in the assessment of this proposal. This project is novel and breaks new ground in the management of a waste stream that will be toxic for millennia. Strategies around its management are based on assumptions that have never been tested. This poses questions from a public health perspective that have never been addressed in human history. This requires a deep comprehensive analysis of its implications in this domain. Public health assessments of the success/failure of this project will not be possible for hundreds of years. Thus, it is important that this project is viewed carefully, ab initio, by public health in a comprehensive manner that is independent of the nuclear industry and its regulator. This proposal would be strengthened by inclusion in this assessment, in some detail, of the perspectives that Health Canada, the only health regulator listed in the report, has contributed to this proposal. It should also include a formal public health assessment by Ontario Health and by First Nations governance institutions.

While the proposal indicates that it has consulted widely and has considered all the legislation that influences this project, the lack of a documented independent public health assessment is worrisome. The concept of holding the exposures to toxins created by this project to “as low as reasonably achievable” (ALARA) is not guaranteed to protect health and allows justification of practices that are potentially harmful. ALARA and the precautionary principle can come into conflict. This underscores the needs for an independent public health assessment and involvement in ongoing monitoring.

The nuclear regulator’s mandate is to ensure that the nuclear industry’s process of production is safe at all points of the nuclear cycle, from ore to waste. It does not have the

mandate to protect public health and cannot be expected to balance this against the needs of an industry that continues to mount a very successful campaign to be viewed as essential to meeting energy needs and as a key strategy to counter climate change. There has been grave asymmetry in describing the benefits of expanding nuclear power in contrast to the risks. This is understandable as the industry, echoed in the proposal, prefers to focus on benefits as opposed to harms. There is increasing evidence that the regulatory framework has proposed standards, allowed processes that have caused negative impacts on human and environmental health, and has avoided oversight in critical areas, such as uranium mining. There is increasing evidence of the negative impact of ionizing radiation, at levels previously labelled as safe, on workers and vulnerable populations.

The well-funded efforts of the industry to contest these findings and the resources it expends to promote the narrative that it is safe, essential and environmentally positive needs to be countered with a more balanced assessment. Indeed, the proposal claims that nuclear power plants in Canada have provided “clean, reliable, and low-carbon energy for decades”. A more careful assessment would suggest that nuclear power is not clean, there are significant human and environmental impacts that include uranium mining, nuclear accidents and waste management. It is not necessarily reliable; some plants have underperformed with some off-line for years. When the whole impact of nuclear power production and eventual decommissioning is calculated, it is not low carbon. Carbon accounting across the whole nuclear cycle has been underestimated and needs to be better studied if its claims to being low carbon are to be substantiated.

While an independent assessment by public health is essential, it is vital that the nuclear regulator ensures that nuclear technology it is as safe as possible. This will ensure, as much as possible, that the nuclear industry’s plan to deal with high level radioactive waste is safe and responsible. This regulation will ensure that the industry is held accountable and responsible, in perpetuity, for the waste that it has generated. This project proposal is flawed, as previously mentioned, by limiting responsibility for the waste to 160 years.

The industry produced this waste and is logically responsible for it forever. If the project is relieved of this responsibility, to whom will it be transferred? To the local First Nations? To the Province of Ontario? To Canada? This needs to be clearly considered in this proposal.”

The central issue that needs to be addressed here is the role of Canadian Nuclear Safety Commission (CNSC). When questioned at public events, the officers of CNSC uniformly suggest that they have a robust public health expertise in house that guarantees that all public health concerns are adequately considered. They do not entertain that there is a major conflict of interest between their role in promoting and regulating the nuclear industry and protecting the public health. CNSC reports to the Ministry of Mines and Natural Resources. Canada has a major stake in uranium mining which has a growing international and, prospectively, domestic market. There are significant and well-articulated concerns that the CNSC has been subject to capture by the nuclear industry.

Whether this is the case can be subject to debate, but for a variety of reasons the health implications of this major project should be assessed independently by the jurisdictions who have the legal authority and the responsibility to protect the public's health. The purpose, scope and time frame of this project demands this.

At the very least, a formal report from the relevant public health authorities, Public Health Agency of Canada, Ontario Health and affected First Nations are required. NWMO should be required to provide this as essential to this proposal. It is insufficient for NWMO to indicate that they have consulted with these agencies. There needs to be consideration, in writing, from all these jurisdictions how they view this project and how they will manage their responsibility for public health for the lifetime of the proposed project. Most of the negative impacts of this proposal, ultimately, have implications for public health. This demands that it be

properly assessed by public health, independent of its current regulator.

These concerns represent the concerns of an organization of health care professionals with considerable expertise in medicine and public health. Our concerns are grounded in our responsibility to promote the health of all.

We would hope that this reality adds weight to our concerns and will prompt a re-evaluation.

We recommend in the strongest fashion that our concerns be added to the summary of issues.

Respectfully submitted

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