



Submission to: Impact Assessment Agency of Canada (IAAC)

From: Ontario Clean Air Alliance

Re: IAAC's Draft Integrated Tailored Impact Statement Guidelines: Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project (April 10, 2026)

Date: April 23, 2026

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We are writing to provide the Impact Assessment Agency of Canada (IAAC) with the Ontario Clean Air Alliance's submissions with respect to its *Draft Integrated Tailored Impact Statement Guidelines: Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project*.

Our submissions are limited to Section 2.3.4: Alternative means of carrying out the Project.

We support the draft requirement that the Nuclear Waste Management Organization (NWMO) must "justify the exclusion of alternative means" of storing used nuclear fuel.

Nevertheless, we request that Section 2.3.4 be amended to explicitly require the NWMO to evaluate whether building above-ground, attack-resistant, reinforced concrete vaults – at our nuclear electricity generating station sites – would be a better long-term storage solution for their used nuclear fuel than building a DGR and transporting used nuclear fuel from multiple nuclear stations to a DGR in northern Ontario.