

Dubious claims of relevance of a site selection process, to IAAC's Impact Assessment and the applicable federal "Physical Activities Regulations".

Comments on IAAC's Draft Integrated Tailored Impact Statement Guidelines, ref. #166000E

Jaro Franta, 9 May 2026

Thanks to the Impact Assessment Agency of Canada and the Canadian Nuclear Safety Commission for inviting comments on the Draft Integrated Tailored Impact Statement Guidelines for the Deep Geological Repository for Canada's Used Nuclear Fuel Project (#88774), proposed by the Nuclear Waste Management Organization (the NWMO).

On April 10 IAAC published their [Draft Integrated Tailored Impact Statement Guidelines](https://iaac-aeic.gc.ca/050/documents/p88774/166000E.pdf) for the Deep Geological Repository for Canada's Used Nuclear Fuel Project (#88774).

<https://iaac-aeic.gc.ca/050/documents/p88774/166000E.pdf>

Since then, several comments have been submitted to the IAAC registry.

Among them is registry submission [Reference Number 809](#), authored by Ontario NDP MPP **Lise Vaugois** (Thunder Bay Superior North). It doesn't mention her name, nor does it say that the submission is really on behalf of the group "*We The Nuclear Free North*" (WTNFN) – which is plainly evident in a Facebook video that was posted on the same day, May 6, 2026, featuring **Vaugois**, with a big bright banner of "wethenuclearfreenorth.ca" below her face.

The need for a thorough Impact Assessment for the proposal
DGR in Revell Lake, ON

Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project

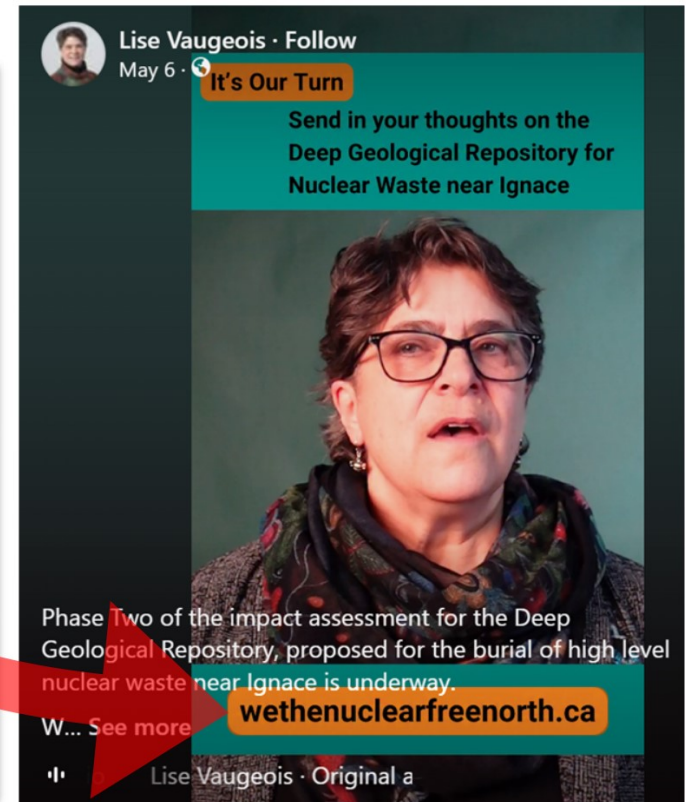
Author: MPP Thunder Bay Superior North [= Lise Vaugeois, NDP]

Reference Number: 809

Submitted: 2026-05-06 - 9:32 AM

This project will affect people along the entire watershed and across the entire transportation route, and is the most environmentally concerning project of our generation.

I am appalled by the strategies used up until now by the NWMO, pouring vast sums of money - money paid by ratepayers for electricity - to convince economically struggling communities that all the scientific elements of this proposed project have already been addressed, when this is far from the case. [This is a cleverly worded reference to the site selection process, which Lise must know perfectly well is NOT part of IAAC's scope of assessment.]



Another of the comments submitted to the IAAC registry was **Reference Number 806**, authored by "Northwatch", which is an alias of **Brennain Lloyd**, the perennial antinuclear activist, who resides in North Bay. Brennain uses several other aliases, and currently does much of the "leg work" for WTNFN, including collection of cash donations and running a long series of Zoom webcasts.

 **Northwatch's Preliminary Comments on the Draft Integrated Tailored Impact Statement Guidelines**
Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project

Author: Northwatch ...meaning **Brennain Lloyd**

Reference Number: 806

Submitted: 2026-05-05 - 2:57 PM

The issues which Northwatch identified during the review of the Initial Project Description as being necessary information in the impact statement – and so requiring identification in the integrated impact statement guidelines - include the following:

- describe the site selection process including social factors
- present an examination of alternative that includes alternative sites, alternatives in repository access (ramp vs shaft), the alternative of transporting the irradiated fuel
- **describe site selection criteria, consultation, community identification, and consent** and site characterization and clearly describe the technical basis for site selection

Yet another of the comments submitted to the IAAC registry was Reference Number 487, authored by **Wendy O'Connor**, who personally runs the WTNNF group and its social media on Facebook. WTNNF generally blocks anyone who fails to agree with the group (ie. the proverbial “echo chamber”).

Comments on the NWMO's Proposed DGR Project, and its Initial Project Description

Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project

Author: Wendy O'Connor

Reference Number: 487

Submitted: 2026-02-04 - 4:03 PM

Community Willingness and Monetary Contributions from the Proponent

Although commercial industries that are already established and operating in communities commonly make contributions to those communities (sponsorships, awards, support of community programs) both out of goodwill and to enhance their positive profile, there is little that could be considered coercive or harmful in such routine support.

This cannot be said of the stunning amount of money the NWMO has lavished on the Township of Ignace – more than \$10,000,000 in the ten-year run-up to the Township’s “willingness” decision. For years, observers have been calling this “bribery” – only to be reminded by other cautious observers that in its legal connotation – a *quid pro quo* offered to influence the decisions or actions of a person in a position of influence or trust - the legal connotation of bribery has not (quite) been met.

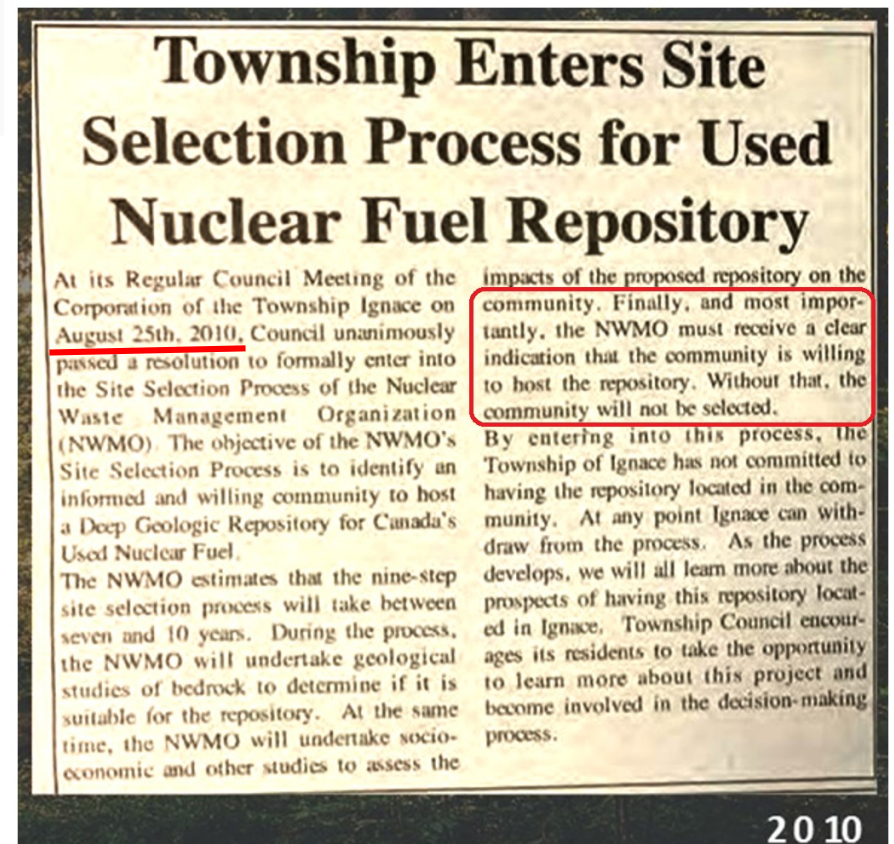
(i.e. either side could walk out at any time, as some prospective host communities have done)

In fairness, I must mention that a portion of such funding is appropriately earmarked for expenses the municipality incurs in the course of liaising with the NWMO and conducting its own deliberations. However, the greater part of the funding is available for use at the discretion of the community and with the approval of the NWMO.

We have seen all this come to pass in Ignace.

The nearby City of Dryden (just a ~~few kilometres~~ ^{70 kilometers} further from the proposed site, and similarly financially vulnerable) has itself received approximately \$5,000,000 in total

"Coercion" in Ignace?



Unsurprisingly, in all three cases, the same series of talking points are espoused, most notably the one about **site selection** for NWMO's DGR project at the Revell Batholith site, with Ignace and WLON as the two host communities, or incorporated communities closest to the Revell site (Ignace decided to enter NWMO's "learn more" process 16 years ago, in 2010). A WTNFN Zoom "webinar" a couple of days prior to the three May 2026 IAAC submissions and the **Vaugois** video, discussed the group's talking points, to be included in their IAAC submissions, with **site selection** to be included in them.

Transcript

19:24:22
Wendy, then Sylvia, then Mary Lou. And Dennis, if you get your mic working anytime, just jump in. Wendy, go ahead.

Wendy O'Connor

19:24:25
Yeah, I was just...

19:24:32
Um, I was just going to mention, I've seen in a couple of instances the impact assessment agency stating that, um, aspects of the siting process and the willingness process are not in the scope of their current examination of the impact assessment process.

19:24:49
And I commented fulsomely on that in the first comment period.

19:24:52
Um, and I'm going to do so again, and my rationale is that...

19:24:58
Um, expressing my concerns on that is relevant to the current examination because it, uh, it may suggest things about what to watch for in the industry's future behavior. Socially. So it forms the basis of my stressing that they need to

19:25:13
Um, to impose strict requirements on what will be

Brennain, Northwatch

19:25:29
Yeah, great, good idea, Wendy. I think the other way they have said that selection site selection isn't part of the review, but social factors are part of what must be examined under the Impact Assessment Act. So that's the

Clearly, IAAC's impact assessment process has NOTHING to do with any site selection process.

We the Nuclear Free North
Yesterday at 10:22 AM

TONIGHT! For those composing comments to the current Impact Assessment comment opportunity (deadline: May 10), you are invited to join We the Nuclear Free North and Nor... See more

ZOOM WEBINAR TONIGHT!
May 3, 7 PM Eastern

Government of Canada / Gouvernement du Canada

SOR/2019-285
Current to March 17, 2026

Guide to Preparing an Initial Project Description and a Detailed Project Description

Introduction

Under the *Impact Assessment Act* (the Act), an impact assessment may be required for designated projects. A designated project includes one or more physical activities that are listed in the *Physical Activities Regulations* (commonly known as the Project List), as well as any physical activity incidental to those listed physical activities¹.

Part C: Location Information and Context

Provide a description of the designated project's proposed location including:

13a
Proposed geographic coordinates including, for linear development projects (e.g. pipelines, transmission lines), the proposed locations of major ancillary facilities that are integral to the project, and a description of the spatial boundaries of the proposed study corridor;

Physical Activities Regulations

Physical activities — designated projects

2 (1) The physical activities that are set out in the schedule are designated for the purpose of the definition *designated project* in section 2 of the *Impact Assessment Act*.

SCHEDULE
(Section 2)

Physical Activities

Nuclear Facilities, Including Certain Storage and Long-term Management or Disposal Facilities

28 The construction and operation of either of the following:

(a) a new facility for the storage of irradiated nuclear fuel or nuclear waste, outside the licensed boundaries of an existing nuclear facility, as defined in section

The same sort of opposition to the site selection process was of course also expressed in WTNFN's most recent submission, **Reference Number 873**, commissioned by them from the **Canadian Environmental Law Association ("CELA")**. For some reason they seem to believe that readers will "buy" their reversed chronology of events, with NWMO's selection somehow preceding the decision by Ignace, 16 years ago, to participate in the process, followed twelve years later by overwhelmingly favorable votes by both Ignace and WLON.

Reference No.88774 - We the Nuclear Free North Submission on Draft Integrated Tailored Impact Statement Guidelines
Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project

Author: We the Nuclear Free North

Reference Number: 873

Submitted: 2026-05-09 - 10:26 AM



Canadian
Environmental Law
Association

EQUITY. JUSTICE. HEALTH.

55 University Avenue, Suite 1500 Toronto, Ontario

Please be advised that the Canadian Environmental Law Association ("CELA") serves as counsel for We the Nuclear Free North ("WTNFN") in relation to the above-noted project.

NWMO committed to seeking an informed, willing community to host the long-term management facility⁶⁴, but has so far been notably silent in response to very serious concerns raised by Indigenous communities and the public about its choice of "hosts" for the preferred site,

WTNFN has repeatedly raised serious concerns about the unfairness of the proposed site in northwestern Ontario

How is an 87.4% vote in favor "unfair"?

Exactly who chose whom?



APM-REP-05000-0210-R000

Initial Project Description: Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project
December 2025

A Community Decision

On November 16, 2024, WLON held a community referendum; 87.4% of participating Members expressed a willingness to proceed into regulatory phases of the project. This decision emerged from more than a decade of learning, Ceremony, and community leadership.

Now, the IAAC has made it clear in their communications and, of course, in accordance with the federal **Impact Assessment Act** and the applicable federal **Physical Activities Regulations**, that the IAAC's only concern is the impact of PHYSICAL ACTIVITIES of a proposed project, at a specified site (and surrounding region), namely construction and operation.

IAAC have NOTHING to do with site selection, be that a proposed mine whose location was determined from mineral prospecting, or a proposed hydro dam whose location was determined from river flow studies and geology suitable for construction of a dam, or a proposed airport whose location was determined from studies of potential passenger traffic, local geography (mountains), wind conditions, access to existing road infrastructure, etc., etc.



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Part C: Location Information and Context

Provide a description of the designated project's proposed location including:

13a

Proposed geographic coordinates including, for linear development projects (e.g. pipelines, transmission lines), the proposed locations of major ancillary facilities that are integral to the project, and a description of the spatial boundaries of the proposed study corridor;

Coordinates should be provided in a form suitable for use in GIS (e.g. longitude/latitude) using international standard representation.

Coordinates should be appropriate for the project type. For example: for the centre of a facility, for the boundaries of a proposed mine site, or for the beginning and end points and path of a linear project.

13b

Site maps produced at an appropriate scale, in order to determine the project's proposed general location and the spatial relationship of the project components.

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SCHEDULE

(Section 2)

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28 The construction and operation of either of the following:

(a) a new facility for the storage of irradiated nuclear fuel or nuclear waste, outside the licensed boundaries of an existing *nuclear facility*, as defined in section 2 of the *Nuclear Safety and Control Act*, other than a facility for the on-site storage of irradiated nuclear fuel or nuclear waste associated with one or more new fission or fusion reactors that have a combined thermal capacity of less than 200 MWth;

(b) a new facility for the long-term management or disposal of irradiated nuclear fuel or nuclear waste.



**The site selection process for large national infrastructure projects is mandated by the government:
Talk to the minister, don't waste your time commenting to IAAC.**

That also applies to **transportation**, where the IAAC only considers the PHYSICAL ACTIVITIES associated with construction and operation of proposed highways, railways, airports, oil & gas pipelines, and marine terminals or canals.

“Operation” in this case means things like maintenance of culverts, bridges, and traffic/safety signaling equipment along roads and railways, and at airports (air traffic control tower operation, runway lighting, security & baggage checking/x-ray, etc.), and shipping canals (traffic control and operation of navigation lock gates).

Regulation of the actual traffic on those highways, railways, airports, etc. (i.e. the mobile equipment, like cars, trucks, trains, airliners, ships, etc.) is the domain of other agencies, such as the Ministry of Transport Ontario (MTO), Transport Canada (ex. hazardous materials such as anhydrous ammonia, sodium cyanide, propane, etc.), and the CNSC (for radioactive materials transport): It requires licensing separate from the construction and operation of the facility, and is therefore outside the scope of IAAC.

Part of this WTNFN / Northwatch / Vaugeois campaign, attempting to drag the IAAC into an issue that is none of their business, is of course denigrating the site / host community selection process that NWMO was mandated by the federal government to perform, as part of the NFWA – Nuclear Fuel Waste Act – a Canadian law.

 <p>Nuclear Fuel Waste Act</p> <p>Published by the Minister of Justice at the following address: http://laws-lois.justice.gc.ca</p> <p>S.C. 2002, c. 23</p> <p>An Act respecting the long-term management of nuclear fuel waste</p> <p>[Assented to 13th June 2002]</p> <h2>Waste Management Organization</h2> <p>Duty toward other owners of nuclear fuel waste</p> <p>7 The waste management organization shall offer, without discrimination and at a fee that is reasonable in relation to its costs of managing the nuclear fuel waste of its members or shareholders, to</p> <ul style="list-style-type: none">(a) Atomic Energy of Canada Limited, and(b) <u>all owners of nuclear fuel waste produced in Canada</u> that are neither members nor shareholders of the waste management organization <p>its nuclear fuel waste management services that are set out in the approach that the Governor in Council selects under section 15 or approves under subsection 20(5).</p>	<p>Vol. 141, No. 13</p>  <h1>Canada Gazette</h1> <p>2007-06-27 <i>Canada Gazette Part II, Vol. 141, No. 13</i></p> <p>Registration P.C. 2007-834 May 31, 2007 SI/2007-63 June 27, 2007</p> <p>NUCLEAR FUEL WASTE ACT</p> <p>Order Selecting an Approach for the Long-term Management of Nuclear Fuel Waste</p> <p>Her Excellency the Governor General in Council, on the recommendation of the Minister of Natural Resources, pursuant to section 15 of the <i>Nuclear Fuel Waste Act</i>^a, hereby selects the Adaptive Phased Management approach for the long-term management of nuclear fuel waste from among the approaches set out in the November 2005 Final Study by the Nuclear Waste Management Organization entitled “Choosing a Way Forward”, that was submitted to the Minister of Natural Resources on November 3, 2005, in accordance with subsection 12(1) of that Act.</p> <p>The APM approach, which was the approach recommended by the Nuclear Waste Management Organization in the study, consists of three phases: the first maintains the waste at the reactor sites while preparing for centralization; the second involves an optional interim step of central storage; and the third ensures long-term containment and monitoring of the waste in a geological repository. The APM approach is also made up of two important components: a management component that will provide opportunities for communities and citizens to participate throughout the site selection process and a technical component to make sure that the best scientific and technical knowledge will be applied for the long-term management of nuclear fuel waste.</p>
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That site / community selection process included a “willingness” vote in both Ignace and WLON, but as plainly stated by Vaugeois in her WTNFN video (partial transcript included below) , those votes should be ignored:

Lise Vaugeois · Follow
May 6 · **It's Our Turn**

Send in your thoughts on the Deep Geological Repository for Nuclear Waste near Ignace

Phase Two of the impact assessment for the Deep Geological Repository, proposed for the burial of high level nuclear waste near Ignace is underway.
wethenuclearfreenorth.ca

Lise Vaugeois · Original audio

Facebook reel, May 6, 2026: <https://www.facebook.com/reel/1966691334211305>

Transcript
Time stamp 00:00:42

Free prior and informed consent from all First Nations and municipalities in the connected watershed and along the transportation route, and the impact assessment guidelines must be based on scientific evidence and not on an approval process based on a small population sample.

Translation:
The two host communities, Ignace and Wabigoon Lake Ojibway Nation (WLON) have been re-branded by NDP MPP Lise Vaugeois as “a small population sample”, to be ignored - while no other community, including Thunder Bay, held any sort of vote.

APM-REP-05000-0210-R000
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Ignace Willingness Study Final Report
June 2024

63.8% Participation - Clear Majority
WCI reports that the majority of residents were indeed reached using a wide range of engagement activities, having seen 660 of the estimated 1035 Resident Participants become registered and approved as eligible to participate in the Willingness Study.

97.0% Completion - Validity of Readiness
WCI reports that of the 660 approved user accounts in the Neuvote system determined to be Resident Participants, 640 of them cast their decision by April 30th, 2024.

89.9% Readiness - Clear Majority
WCI reports that of the 660 approved Resident Participants, 594 declared they were indeed ready to cast their decision and felt informed enough to do so in advance of, or during, the voting period in April 2024. Of those 34 (5.1%) approved Resident Participants who declared they were not ready to cast their decision, all but one cast their decision concerning willingness by April 30th, 2024. Another 33 (5.0%) approved Resident Participants did not declare readiness during the process.

77.3% Willing to Continue as a Host Community - Clear Majority
WCI reports that of the 640 votes cast in April 2024, 495 (or 77.3%) of Resident Participants of marked “yes” on their ballot in support of continuing as a potential host community of a Deep Geological Repository of used nuclear fuel near Ignace. The voting results also demonstrated that 133 (or 20.8%) of Resident Participants marked “no” indicating their desire to stop the process of becoming a potential host community, and 12 abstained (1.9%) from making a clear choice. Only 3%, or 20 individuals, chose not to vote in April 2024 despite being approved, reminded, and were eligible to.

Wendy O'Connor in particular has a long-standing PITA regarding NWMO's site selection process, so it's not surprising that she won't quit no matter what.

Prior to the vote in Ignace, which was 77.3% in favor of the project, **Wendy insisted that there would never be a vote.**

The WLON community later voted even more in favor, 87.4%. Does that look like "social division", as claimed by opponents?

WTNFN, 17 April, 2026:

Author
We the Nuclear Free North
Vince Ponka NWMO has no robust evidence of having willing host communities. And, you've visited the current storage facilities and believe, based on the evidence of your own eyes, that there is no damage there, just as you

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Wendy O'Connor, 25 April, 2022:

Wendy WoodsWalker
Jaro Franta **There will be no poll of residents to determine willingness in Ignace, door-to-door or otherwise.** Council will decide, and will inform the NWMO of their decision.

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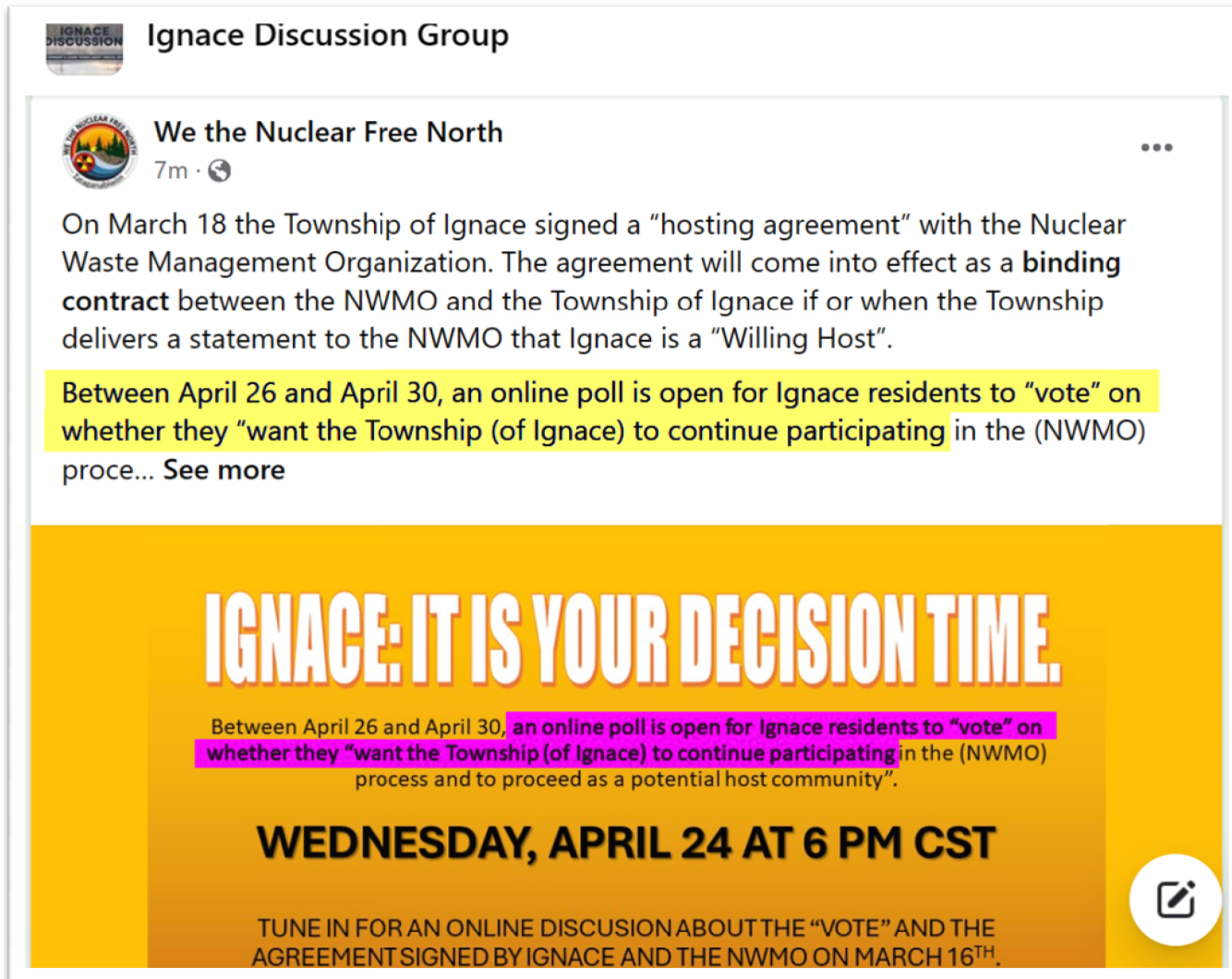
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Also, just prior to the vote in 2024, Wendy O'Connor & WTNNF urged residents of Ignace to vote, but after it failed miserably to go their way, they suddenly claimed that the vote was irrelevant – as they do to this day, now as part of their demand for IAAC's consideration of site selection:

Confusing, isn't it?



IGNACE DISCUSSION Ignace Discussion Group

 **We the Nuclear Free North**
7m · 

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) proce... [See more](#)

IGNACE: IT IS YOUR DECISION TIME.

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”.

WEDNESDAY, APRIL 24 AT 6 PM CST

TUNE IN FOR AN ONLINE DISCUSSION ABOUT THE “VOTE” AND THE AGREEMENT SIGNED BY IGNACE AND THE NWMO ON MARCH 16TH.




The claim is that the decade-long “learn more” process, with extensive **public engagement sessions that included representatives of both IAAC and CNSC** in Ignace & WLON, was somehow irrelevant for the outcome of the votes, but that the “hosting agreements” which the two communities effectively voted on as part of their “willingness”, totally invalidated those community votes.



Wendy has been up the proverbial [muddy] creek without a paddle ever since the votes in Ignace & WLON.

She's unlikely to get a paddle now from IAAC, as that would be against their legal, government-mandated scope of review: She might want to block them instead, like she blocks everyone else who fails to agree with her.



HEY IAAC, YOU'VE GOT TO HAND ME A PADDLE!
I'M UP  CREEK HERE!
IGNACE AND WLON VOTED OVERWHELMINGLY IN FAVOR
OF THE PROJECT, DESPITE MY PERSONAL INSISTANCE
THAT THERE WOULD NEVER BE ANY VOTE.
HELL, ACCORDING TO LEANNE NICHOLSON, EVEN MOST
OF THE RESIDENTS OF DYMENT ARE FOR IT, ALTHOUGH
THEY NEVER HELD ANY VOTE.
YOU ABSOLUTELY MUST INCLUDE NWMO'S SITE
SELECTION IN YOUR ASSESSMENT, REGARDLESS
OF WHAT THE FEDERAL IMPACT ASSESSMENT ACT
AND THE PHYSICAL ACTIVITIES REGULATIONS SAY.
I WILL BE REALLY PISSED IF YOU DON'T, AND WILL TELL
OUR GROUPIES TO RE-DOUBLE THEIR COMMENTING.

SMELLY



As for MPP **Lise Vaugeois**, it's worth noting that her own political party, the Ontario NDP, has declared its support for nuclear power in Ontario, in September of last year (2025).

Obviously, used nuclear fuel from operating the nuclear power plants must be stored securely for the very long term, as directed by the NFWA.

Vaugeois' opposition to the DGR project makes no sense at all.

Bob Walker • 1st
National Director - Canadian Nuclear Work...
21h • 🌐

There's a lot of Energy at the Ontario NDP Convention today.

Bob Walker • 1st
National Director - Canadian Nuclear Workers' ...
35m • 🌐

A historic day at the Ontario NDP Convention. The ONDP supports all ultra-low emissions electricity sources including made-in-Canada nuclear energy.

BE IT RESOLVED THAT THE FOLLOWING BE ADDED TO THE ONDP POLICY BOOK

- i. The ONDP joins the CLC and OFL in supporting all ultra-low emissions electricity sources including hydro, renewables, **made-in-Canada nuclear** and storage;
- ii. The ONDP recognizes the strategic importance of ultra-low emissions electricity to Ontario's economy and environment; will fight to ensure that future benefits from investment, innovation, and supply chain jobs stay in Ontario, and Canada;
- iii. The ONDP believes that a low-carbon future requires meaningful engagement, informed consent, and opportunities for partnership with local Indigenous communities;
- iv. The ONDP reaffirms its support for public ownership of electricity generation.
- v. This policy builds on and is subject to the conditions detailed in 5.4.2 and would meet the need for First Nations free, prior and informed consent.



Society welcomes Ontario NDP passage of pro-nuclear resolution

September 21, 2025

PRESS RELEASE

SOCIETY WELCOMES ONTARIO NDP PASSAGE OF PRO NUCLEAR RESOLUTION

NIAGARA FALLS – The Society of United Professionals (“the Society”) welcomes the passage of a pro-nuclear resolution at this weekend’s Ontario NDP (“ONDP”) Convention in Niagara Falls. With the passage of the resolution, the Party has made an important and welcome decision to modernize its electricity policy in support of a low-carbon, good-jobs future for Ontarians.

“We are very pleased to see the ONDP put their support behind the tens of thousands of unionized nuclear workers in the energy sector, and to recognize that made-in-Canada nuclear is going to play an integral part of Canada’s path to net-zero emissions,” said Society President Rebecca Caron. “We look forward to working with them to ensure that Ontario undertakes smart policy in the energy sector that prioritizes Canadian jobs and made-in-Canada CANDU technology.”

The passage of the pro-nuclear resolution reverses the ONDP’s long-standing opposition to nuclear power and brings the Party in alignment with the policies of the Canadian Labour Congress (CLC) and the Ontario Federation of Labour (OFL) who have both passed similar resolutions supporting nuclear power and the workers that power the sector.

“Building a coalition of young people, Labour, and environmentalists was essential to getting this resolution passed,” said Caron. “I’m particularly pleased to see the role that the Ontario New Democratic Youth (ONDY) played in building popular support for this resolution. These young workers know that nuclear supports great careers for workers and is necessary to achieve net-zero emissions.”

And lastly, back to everyone's favorite 1975 comedy movie.

(With an update of the speech)

