

**Submission to Impact Assessment Agency of Canada
re: Draft Tailored Impact Statement Guidelines for NWMO Deep Geological Repository
Project**

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I value this second opportunity to present my concerns regarding the Nuclear Waste Management Organization's proposed deep geological repository (DGR) project between Ignace and Dryden, and trust that the Impact Assessment Agency of Canada will examine all comments made to the Registry in this matter with due diligence and care, for the protection of the environment and for the safety and well-being of those who live in Canada.

I wish to emphasize the value of the Impact Assessment Agency's role, which I understand and appreciate as neutral to the aspirations of project proponents. It is vital that, in Canadian society, we fall no further under the exercised influence of commercial interests that can bring detrimental effects to populations. The Impact Assessment Agency's role is key here, and the Agency must work with determination and integrity, as Canadians depend on it to do.

Further to this is the perception among some that Canadian government bodies and agencies are already "in bed with" industrial interests. I do not believe the Impact Assessment Agency is currently so affected, and so I urge the Agency to ensure that this present process with the NWMO is plainly an **assessment process**, based on scientific evidence and sustainability principles, and does not shift towards functioning as an **approval process**.

I am a volunteer with We the Nuclear Free North (WTNFN), an alliance of people and groups opposing a deep geological repository for nuclear fuel waste in northern Ontario. The views and concerns I express are my own, but many are held in common with WTNFN.

The Necessity of the Full Assessment of Transportation of the Waste

The NWMO has consistently presented the transportation aspect, appropriately and obviously, as integral to its project. Canada's *Impact Assessment Act* requires that activities "incidental to" a project be examined as part of the project. The NWMO project's relationship with its transportation components meets this criterion: the project cannot

take place without transportation of the waste to the proposed site, and the transportation would not take place but for the purposes of the project.

However, in its *Initial Project Description*, the Organization omitted information on transportation altogether, in an attempt to avoid examination of the project's Achilles heel. The Organization has publicly contended that the transportation of the waste need not be examined in the project's Impact Assessment because such transportation is already regulated by Transport Canada and the Canadian Nuclear Safety Commission (CNSC). This argument rings entirely hollow: the deep geological repository itself would presumably also be regulated by the CNSC, and yet the need for details of the DGR is not challenged on this basis.

[As a sidebar, the CNSC is hampered in its ability to create nuclear-fuel-waste-specific transport safety protocols, as highly radioactive nuclear fuel waste is included alongside much lower-risk items such as industrial smoke detectors as part of the "catch-all" Class-7 category in the *Transportation of Dangerous Goods Regulations*. This situation badly needs amending.]

Nor do federal or provincial transportation ministries' existing Regulations constitute adequate argument for omitting examination of the transportation of the material in question. From the specialized containment casks for transporting the waste (there are likely to be several models, and to date only partial testing results are available, for only one of the models), to the specially fitted vehicles and railcars for transport, to the physical condition of highways and railways to safely withstand the more than 30,000 profoundly heavy loads of waste that would be transported – there is much that it is necessary to examine, *that is entirely specific to this project*.

The IAAC's draft *Guidelines* touch on transportation, but some open-ended wording is present, and the Agency's direction could be interpreted as applying only to transportation in the vicinity of the project site (entrances off the highway, etc.).

However, it is paramount that transportation *along the whole of the transportation route(s)*, whether by road or rail, be described and examined in detail. At 30,000+ predicted loads (risks inherent in a single load x 30,000), it can be argued that this is the most potentially impactful transportation activity ever proposed in Canada.

Canadians expect and trust that the project's long-distance transportation components will be assessed thoroughly.

Necessity of the Project – Risks vs. Benefits – Examination of Alternatives

A project of this magnitude and carrying significant risks is only worth undertaking if the benefits of its implementation outweigh the anticipated, or possible, harms.

The nuclear industry, in the form of the NWMO, publicly touts that the waste must be moved great distances from its origins in the immediate future because it is currently in “interim” storage. This is typical of the thin and false concepts the nuclear industry via the NWMO attempts to normalize, and uses vast amounts of the public’s money to advertise.

The nuclear industry maintains that its wastes must be moved from local facilities for reasons of safety. Note that the risk of maintaining nuclear fuel waste near the reactor sites is barely attenuated by the transport of a large part of this waste to a distant repository. Fresh nuclear fuel waste must be maintained for 30 years in cooling pools and dry storage at the reactor sites, before it can be considered for transport. A large-scale transportation project, as proposed, multiplies these risks by further locating dangerous material along the transport routes while in motion, and introducing it, with attendant new risks, at the DGR site.

To their thin arguments concerning the risks of on-site waste storage, the nuclear industry adds, on the other side of the equation, speculative benefits of undertaking the DGR project in northwestern Ontario, such as job creation and population boost. Thus, understatement of risk has been habitually hitched to unsubstantiated prediction of benefit.

The NWMO’s *Initial Project Description* is very weak on the presentation of alternatives, and the draft *Guidelines* have not demanded additional details, although an examination of alternatives is expressly required by the *Act*. I understand the NWMO proposes to substitute their 2005 publication *Choosing a Way Forward – a Final Study Report* as a source of information on alternatives, but a 21-year-old document can hardly be considered fully relevant today. The public requires and deserves a current, up-to-date examination of alternatives.

We the Nuclear Free North, and many allied organizations advocate for continued maintenance of nuclear fuel waste near its points of production, the nuclear power reactors – where it has already been maintained, with a respectable safety record, for decades.

The construction of improved, hardened facilities on-site or very nearby, that are designed for long-term containment would eliminate the risks of long-distance transport, and allow for responsible monitoring of the waste and repackaging as it becomes necessary, at the local facility. This approach will also allow for the maturation of technologies that may render the waste itself, or its maintenance, less risky.

Thus, I and many Canadians believe local management, where expertise and support infrastructure already exist, is optimal among alternatives, and can be achieved at much reduced cost and danger compared to the NWMO’s proposed DGR project.

Please require that the NWMO include a detailed, current examination of alternatives to the DGR project, in its *Impact Statement*.

Community Willingness and Monetary Contributions from the Proponent –

Implications for Social Well-Being

Although the Impact Assessment Agency of Canada has recently stated that issues regarding the NWMO's siting process are outside the scope of its review, I wish to re-emphasize certain information I included in my comment on Feb. 4, because the NWMO's actions I recounted there could reasonably be predictive of the Organization's future actions.

The NWMO provided more than \$10,000,000 to the Township of Ignace in the ten-year run-up to the Township's "willingness" decision. Observers have long sensed, commented on, and been alarmed by the obvious unethical nature of the NWMO's monetary tactics. The sheer amounts of funding provided to the Township of Ignace have been viewed, quite reasonably, as flagrantly coercive.

A portion of such funding is used 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. In public eyes, it is simply a bribe.

Inevitably, municipal governments come to depend upon the continuance of such contributions from the nuclear industry, and will tend strongly to be amenable to the proponent's plans.

Under these conditions, the provision of such funding by the proponent is seen by many Canadians as coercive, in that it violates social norms that we know, or intuit, make us a better society.

Leaders within the NWMO, who develop and act on plans such as providing this funding, presumably are aware of such norms, but choose to act outside them. Their actions are viewed by many Canadians as disingenuous, socially dangerous, or "*just a hair short of illegal*". In this environment, the Organization's continuous virtue signalling is viewed as the height of hypocrisy.

In my submission on Feb. 4, I also detailed many egregious examples of misinformation conveyed by NWMO employees.

Such observations, made by many, are sources of stress and contribute to an erosion of faith in both industry and government leadership.

I and many others have observed the tensions and social breakdowns suffered by communities affected by controversies around the proposed project.

A fear of stigma has been voiced among local property owners, food producers and those whose income depends on tourism, leading to uncertainty over whether to continue doing business. If the project proceeds, uncertainties have already been expressed regarding personally harvesting foods and medicines from the lands and waters.

Please hold the NWMO to the highest possible standard in your requirements for an analysis of risks to the social and emotional health of affected populations – including Indigenous populations and communities. Much damage has already taken place.

Safety and Dangers of the Deep Geological Repository

Please ensure that the NWMO provides full detail on the long-term safety and performance of the DGR. It is vital, in particular, that the industry's "multi-barrier concept" be subjected to very close scrutiny. Independent experts have expressed grave doubts about the independent functioning of the several barriers, which the NWMO conveys in its literature. If the failure of one barrier can contribute to the failure of the next, as experts suspect, the barriers do not in fact constitute a strong single system.

Also, comprehensive detail must be required on how waste arrives at the repository site, how it is conveyed to the Used Fuel Packaging Plant, how it is processed in the hot cells, and how it is eventually to be deposited underground – including packaging details (and possibly alternatives), safeguards under accident conditions, and emissions of contaminants (including radioactive) to air and water during normal operations.

Short-term and long-term monitoring, as well, have so far been presented in scant detail, and need to be comprehensively described.

I described concerns over local seismicity, retrievability of the used fuel, and decommissioning and closure in my Feb. 4 comment. These remain front-of-mind as areas in which great detail must be required of the proponent.

The long-term safety of the repository is of great public concern. No nuclear fuel waste in the world is currently managed as is proposed in the NWMO's DGR project, and as such, no international consensus, or safety track record, exists.

Given the NWMO's off-hand attitude to the Impact Assessment process so far, I cannot over-emphasize how stringent and consistent the Agency must be in its requirements.

Thank you to the Impact Assessment Agency of Canada for reviewing and considering my submission.