

TOWNSHIP OF IGNACE

Deep Geological Repository (DGR)

for Canada's Used Nuclear Fuel Project

DOCUMENTATION PACKAGE

RECOMMENDATIONS FOR AMENDMENTS TO THE TAILORED IMPACT STATEMENT GUIDELINES

Prepared by the Ignace Peer Review Team (IPRT)

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in association with Transfert Consulting

May 10, 2026

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TRANSMITTAL LETTER

May 10, 2026

To: Impact Assessment Agency of Canada (IAAC)/Canadian Nuclear Safety Commission

Re: Deep Geological Repository Project – Socio-Economic Impact Assessment

Subject: **Township of Ignace Submission on Tailored Impact Statement Guidelines**

Dear Sir/Madam,

The Corporation of the Township of Ignace (the “Township”) provides this submission in its capacity as the host municipality for the proposed Deep Geological Repository Project (the “Project”).

The Township wishes to clearly state at the outset that it remains **supportive of the Project** and of the continued efforts of the Nuclear Waste Management Organization to advance the Project in a responsible and transparent manner, which it will undoubtedly undertake. The Township also acknowledges and appreciates NWMO’s ongoing engagement with Ignace and surrounding communities, including the collaborative work undertaken to date to support community understanding, participation, and readiness.

The Township continues to act as a **willing and informed host community**, and values the working relationship that has been established with NWMO. The Township recognizes the significance of the Project and the importance of maintaining a constructive and respectful dialogue as the Project advances through the regulatory process.

This report sets out the Township’s recommendations to strengthen the Tailored Impact Statement Guidelines for the Deep Geological Repository project,

The Township offers these comments to assist IAAC and the CNSC in ensuring that socio-economic effects are considered fully, transparently, and at the appropriate local scale.

SPECIFIC COMMENTS ON THE TAILORED IMPACT STATEMENT GUIDELINES

The following are the Township of Ignace’s suggestions for amendments to the Draft Integrated Tailored Impact Statement Guidelines (TISG) for the Deep Geological Repository (DGR) for Canada’s Used Nuclear Fuel Project, released by the Impact Assessment Agency of Canada (IAAC) and the Canadian Nuclear Safety Commission (CNSC) on April 10, 2026.

Our submission builds on two previous Township of Ignace submissions:

- Recommendations for Impact Assessment arising from the review of the Initial Project Description (IPD) submitted February 3, 2026, and;
- The Township of Ignace’s Review of NWMO’s Response to the IAAC and CNSC Summary of Issues submitted April 15, 2026.

Together, these reports provide a continuous record of the Township’s technical engagement with the federal review process.

The next section suggests **18** specific areas of amendment of the Draft TISG. The recommended amendments are shaped to maintain a constructive, partnership-oriented tone, strengthening the TISG framework rather than challenging NWMO’s response work.

RECOMMENDATIONS FOR AMENDING THE TAILORED IMPACT STATEMENT GUIDELINES

The following are **18** suggested amendments to the Draft TISG. Each recommended amendment references the specific TISG section number(s) and page(s) and is informed by the IPRT’s technical review.

Recommendation 1: Add ‘Nuclear and Public Safety’ as a Valued Component (VC)

TISG Reference: Section 1.2 — Selection of Valued Components (p. 2–5)

Gap Identified

The TISG’s Valued Component (VC) table (Section 1.2) consolidates the entire Human Environment into a single VC: “Health, social and economic conditions.” Safety, encompassing radiological protection, occupational health and safety, emergency preparedness, and nuclear safety culture, is addressed across multiple sections (5.4, 7.2, 9, and Appendix A), but is not identified as a standalone focal point for the assessment.

For a project designed to contain radioactive material for millions of years, safety is arguably the most material element for decision-making under the IAA. Designating it as a VC would ensure it receives the full assessment treatment: baseline characterization, effects pathways, mitigation

measures, monitoring, and follow-up, providing a comprehensive and transparent safety narrative throughout the Impact Statement.

This approach would also complement the CNSC's Safety and Control Area Framework (Appendix A) by creating a unified, IAA-focused assessment of safety that brings together the currently dispersed requirements into a coherent whole. It would strengthen public confidence and support the Township's overarching principle of supporting a world-class used fuel disposal facility.

Requested Amendment

- Add "Nuclear and Public Safety" as a standalone Valued Component in the TISG's VC table (Section 1.2), encompassing radiological protection, occupational health and safety, emergency preparedness, and nuclear safety culture.
- Require the Impact Statement to present an integrated safety assessment that brings together the currently dispersed requirements across Sections 5.4, 7.2, 9, and Appendix A into a coherent narrative.
- The safety VC should require baseline characterization of existing safety conditions, assessment of effects across all project phases, identification of mitigation and enhancement measures, and a long-term monitoring framework.
- This VC would provide a natural home for the standard that no radiological or contaminated material should cross site boundaries.

Recommendation 2: Include information for 'Radiological Conditions' in Valued Components

TISG Reference: Section 1.2 Selection of Valued Components, Table following line 133

Gap Identified

No information is provided for the row *Radiological Conditions*. At a minimum, this should include doses to workers and the public, releases of radioactive material (including airborne), and the potential for radiological contamination to surfaces and individuals.

Requested Amendment

- Add text addressing doses to workers and the public, releases of radioactive material (including airborne), and the potential for radiological contamination to surfaces and individuals to the row for Radiological Conditions.

Recommendation 3: Establish a Host Community Technical Advisory Group

TISG Reference: Section 1.3 — Preparing the Impact Statement (p. 6)

Gap Identified

The TISG (p. 6) notes that IAAC may establish technical advisory groups consisting of Indigenous Nations and communities, federal authorities, provincial authorities, or others. There is no provision for a dedicated host community advisory role.

Requested Amendment

- Add an explicit provision in Section 1.3 for a Host Community Technical Advisory Group (TAG) for the Township of Ignace.
- The host community should have a recognized, named seat at the table, not be grouped under “others.”
- Preferable, the Ignace TAG would be solely membered by Ignace stakeholders

Recommendation 4: Require ‘Benefit Maximization’ as part of the Socio-Economic Analysis

TISG Reference: Section 7.1 — Health, Social and Economic Conditions (p. 38–40); Section 7.1.2 — General effects assessment (p. 41)

Gap Identified

Section 7 of the TISG refers to Ignace residents only as “local peoples” with no reference to the important distinction of the Township of Ignace as a host community. The Township respectfully notes that the TISG would benefit from explicitly recognizing the Township of Ignace and Wabigoon Lake Ojibway Nation as host communities, with a distinct role from “the public.” This distinction would strengthen the assessment framework throughout.

Throughout Ignace’s 15-year engagement process, the achievement of community well-being has been central to the Township’s expectations, and it is an NWMO promise. The people of Ignace see community well-being as the interaction of NWMO as an ‘anchor institution’ that exercises excellent corporate responsibility and leverages its influence and resources to assist the people of Ignace to achieve community well-being. The TISG framework would be strengthened by reflecting this anchor-institution expectation.

The *Definitions Section* of the *Hosting Agreement* acknowledges Ignace’s *Community Vision*, *Community Pillars*, and *Community Principles*, further defined through *Community Studies*. These Principles centre on: **People, Economics and Finance, Infrastructure, Community and Culture, and Natural Environment**. *Schedule G* of the *Hosting Agreement* specifies capability and capacity building based on five strong basic pillars. This part of the *Hosting Agreement* needs

to be operationalized through the Impact Statement. We discuss the preferred Impact Assessment methodology in the following sections.

Of note, Section 7.1.2 of the TISG does not refer to Ignace's desire to maximize socio-economic benefits. There is no reference to how effects are to be evaluated against the Township's goals in relation to the Vision. In the Township's comments on the Initial Project Description (See the reference in the Reports Section of this Documentation Package), the IPRT recommends specific impact assessment and evaluation methods that should be used to assess community benefits. The TISG should require NWMO to adopt these or equivalent methods.

The TISG should spell out expectations for how socio-economic and psycho-social changes due to the DGR should be evaluated. The social science impact assessment literature describes a range of evaluation methods, including cost-benefit analysis, goals achievement matrices, competition-for-benefit models, and Community Impact / Benefits Assessment (CIA / CBA). Of these, the method of Community Impact / Benefits Assessment is particularly well suited to the Ignace host-community contexts, as it would evaluate DGR project opportunities and effects against the community's own vision, goals, aspirations and well-being pillars. This evaluation method is much more appropriate than the potential NWMO assessment methodology of assessing aggregate net-effect measures. Further, this approach aligns directly with the Hosting Agreement's vision pillars and with the goal-oriented economic assessment recommended in **Recommendation 12**.

We are concerned that NWMO appears to contemplate that socio-economic issues may only be addressed through the *Nuclear Fuel Waste Act* framework. The Township believes the *Integrated Impact Assessment* offers an important complementary and appropriate opportunity to ensure that host community benefit optimization is formally embedded in the assessment process.

Requested Amendment

- The TISG should explicitly name the Township of Ignace and Wabigoon Lake Ojibway Nation as host communities
- The assessment should evaluate community enhancement, not just adverse effects and mitigation. The TISG should be unambiguous in requiring NWMO to identify and assess community benefits.
- Require NWMO to demonstrate how the project operationalizes the *Hosting Agreement's Definition Section* (communities, not merely "local peoples" or "the public").
- *Section 7.1* should require the *Impact Statement* to assess positive socio-economic outcomes and opportunities for Community Vision, Community Pillars, Community Principles: People, Economy, Infrastructure, Community and Culture, Natural Environment, and *Schedule G* (capability and capacity building based on the strong basic pillars), as well as the commitments implicit within "*The Ignace Story*" (*IPD Section 4.3.2*).
- Require NWMO to embrace its role as an 'anchor institution', leveraging its influence and resources to support Ignace in achieving community well being.

- The TISG should specifically require the Impact Statement to apply a Community Impact / Benefits Assessment (CIA / CBA) framework, evaluating project effects against the Township's Hosting Agreement pillars and community well-being objectives, rather than relying solely on aggregate net-effect measures.

Recommendation 5: Address the Worker Camp Location and Residential Exclusion Zone

TISG Reference: Section 2.2 — Project components and activities (p. 8); Section 7.3 — Baseline for social conditions (p. 46)

Gap Identified

DGR construction activities will last for a generation. The NWMO's *Interim Project Description* contemplates an on-site worker camp. The specific location on site has not yet been determined. An important question remains regarding the compatibility of on-site worker accommodation with a future *Residential Exclusion Zone* that may be required to meet the requirement of a future *Waste Nuclear Substance License*. Addressing this question early in the assessment would strengthen the overall radiological protection framework. We provided detailed comments in our first Report addressing the Interim Project Description.

The Township's long-standing position is that there should not be a camp on the DGR site.

NWMO is already aware of its staffing requirements, and temporary and permanent housing for the workforce should instead be constructed in the Township of Ignace, consistent with the Hosting Agreement's capability and capacity building pillars and supporting population stabilization in the host community.

Requested Amendment

- The TISG should require NWMO to resolve the inconsistency between an on-site camp and a future *Residential Exclusion Zone* before the *Impact Statement* is finalized.
- Section 2.2 of the TISG should require the *Impact Statement* to reflect the Township's position that workforce accommodation be located in the Township of Ignace rather than on-site, and to plan temporary and permanent housing in Ignace accordingly.
- Section 2.2 should require the Impact Statement to specify the location of NWMO contractor workforce accommodation and assess alternatives, explicitly including a working housing located in the Township of Ignace.
- Section 7.3 should require assessment of the radiological implications of workers residing within a Licensed Nuclear site.

Recommendation 6: Expand Assessment of Alternative Means

TISG Reference: Section 2.3 — Project Purpose, Need and Alternatives Considered (p. 8–10)

Gap Identified

The current list of alternative means in Section 2.3 is too narrow. Several important alternatives identified by the IAAC Summary of Issues are not explicitly addressed.

Requested Amendment

Section 2.3 of the TISG should expand the assessment of alternative means to include:

- Ramps vs. vertical shafts
- Use of tunnel boring machines vs. dynamite – particularly when used nuclear fuel is also being stored underground at the same time as dynamite
- DGR workers located in Ignace vs. on-site
- Ignace as provider of water, wastewater, and conventional waste management services vs. these services being built on site
- Assess alternative locations for low and intermediate level radioactive waste management, particularly in relation to people NWMO proposes to have living and working on site
- Design, purpose, and alternative locations of the rail spur

Recommendation 7: Balance Indigenous and Non-Indigenous Community Engagement Topics

TISG Reference: Section 3 (p. 11); Section 8 — Indigenous Nations and Communities (p. 54–60); Section 12.3 — Sustainability (p. 72)

Gap Identified

The TISG requires engagement with Indigenous communities on topics such as water taking and discharge, institutional controls, cumulative health effects, and ecology.

We wish to point out that these same topics are equally relevant to the host municipality. The Township of Ignace would also like to be engaged.

Pathways: We assert elsewhere in this Documentation Package and other Ignace reports that there should be no off-site pathways. However, we also note that potential ‘pathways’ are germane to the impact assessment. Given this, the Township observes that if there are health and ecological effect pathways that reach Indigenous communities, these pathways would logically also affect nearby non-Indigenous communities. The TISG should assess this concept by requiring parallel engagement with both.

Institutional Controls: On the matter of institutional controls, there is a rich history of public dialogue on this topic that predates the current assessment. Faith groups and civil society

organizations (including through the Interfaith Program for Public Awareness of Nuclear Issues (IPPANI) process, and industry and academic seminars and research) have explored fundamental moral and ethical questions¹: What obligations do we have to future generations? What is acceptable risk? How can institutions survive over the long-time frames being considered? The TISG would be strengthened by recognizing this important body of public discourse and ensuring that institutional controls are framed as a conversation with both Indigenous communities and the host community, given Ignace's direct stake in long-term stewardship.

Requested Amendment

- The TISG should require parallel engagement tracks — one for Indigenous Nations (as required), and one for the host municipality and regional communities.
- Where the TISG requires engagement with Indigenous communities on specific topics (water, health monitoring, institutional controls, ecology), it should explicitly require equivalent engagement with the host municipality.
- Institutional controls discussions should draw on the existing body of public dialogue, including the IPPANI process and industry and academic research and seminars on moral and ethical issues pertaining to nuclear energy. The TISG should require engagement with both Indigenous communities and the host municipality on questions of long-term stewardship, acceptable risk, and intergenerational obligations.
- *Section 12.3* (Sustainability) should assess effects on both Indigenous and non-Indigenous community sustainability.

Recommendation 8: Add a Public and Host Community Engagement Section

TISG Reference: Section 3 — Description of Engagement with Indigenous Nations and communities (p. 11) IAAC References: IAAC - Draft Public Participation Plan; IAAC - Draft Indigenous Engagement and Partnership Plan.

Gap Identified

Section 3 of the TISG requires the Impact Statement to describe engagement with Indigenous Nations and communities, which is essential. However, there is no parallel requirement for engagement with the public or the host municipality. The TISG would benefit from distinguishing between host communities and the general public — the Township of Ignace, as a willing host community with a formal Hosting Agreement and distinct responsibilities, warrants a distinct category from “the public.” Given that many of the same topics — water, ecology, institutional controls, and health monitoring — are equally important to Ignace residents, the TISG would

¹ See: Canadian Nuclear Association (1980) Moral and Ethical Issues Relating to Nuclear Energy Generation: Proceedings of a Seminar, Toronto; Cluff Lake Board of Inquiry, (1978) Final Report, Chapter XI, Moral and Ethical Issues in the Development and Use of Nuclear Energy; AECL, (1991) Moral and Ethical Issues Related to the Nuclear Fuel Waste Disposal Concept. Technical Record TR-549. Atomic Energy of Canada Limited Research.

benefit from requiring a description of host community and public engagement alongside Indigenous engagement.

Requested Amendment

- Add a Section 3.2 (or equivalent) requiring the Impact Statement to describe engagement with the host municipality and the broader public.
- Host community engagement should be on equal footing for site ecology, institutional controls, health monitoring, water taking and discharge, and waste management.
- Where the TISG requires engagement with Indigenous communities on specific topics, it should also require engagement with the host municipality.

Recommendation 9: Map Site Boundaries and Establish Trigger/Action Levels

TISG Reference: Section 4 — Assessment Methodology (p. 12); Section 5.4 — Radiological conditions (p. 18)

Gap Identified

The TISG requires spatial and temporal boundaries but does not specifically require the mapping of radiological control zones or the establishment of trigger and action levels. The Township of Ignace notes that site boundary maps still lack internal and external site boundaries — an issue first raised in the Township’s February 2026 IPD submission.

At the same time, the Township encourages the TISG to adopt a proportionate approach to spatial boundaries for socio-economic effects assessment. Focusing assessment effort on the host community and neighbouring municipalities, where effects are most material, would produce a more meaningful Impact Statement than extending detailed assessment on Red Lake, Kenora and other communities hundreds of kilometres away where effects are expected to be negligible.

Requested Amendment

- Section 4 should require all baseline and effects maps to clearly delineate the protected area boundary, perimeter boundary, exclusion area boundary, and residential exclusion zone.
- Section 5.4 should require the establishment and mapping of on-site “trigger” and “action level” boundaries with corresponding effect assessments.
- The assessment standard should be no radiological or contaminated material crosses site boundaries. This is the standard applied at nuclear generating stations currently managing used fuel and should be the standard for the DGR.
- The socio-economic and psycho-social effects assessment should focus on host communities and those in proximity to the DRG site, rather than far away communities where effects would be negligible. A broad focus on the KDMA would potentially undermine the analysis on areas where effects are most likely to occur.

Recommendation 10: Clarify information for Section 5.4 Radiological conditions

TISG Reference: Section 5.4 Radiological Conditions

Gap Identified

No radiological information during operations is provided in this section on Radiological Conditions. CNSC considers radiation protection as an important core control process as it is the first listed core control process in the Table in *Appendix A for Safety and Control Area Framework* (page 9 of *Appendix A*).

At a minimum, this information should include doses to workers and the public, releases of radioactive material (including airborne), and the potential for radiological contamination to surfaces and individuals. The application of the As Low as Reasonably Achievable (ALARA) standard should also be discussed. Workers should include those classified as *Nuclear Energy Workers* (NEWs) and on-site personnel who are not classified as NEWs. The doses should include doses from routine operations and accidents.

Requested Amendment

- Add text addressing doses to workers and the public, releases of radioactive material (including airborne), and the potential for radiological contamination to surfaces and individuals, and the application of ALARA for both routine operations and accidents.
- Add a pointer to Section 7.2.2.1 (lines 1414-1420) on radiological doses.
- Add a pointer to Section 7.5 (lines 1711-1718) for additional details on doses.

Recommendation 11: Strengthen Emergency Response Requirements and Define Ignace's Role

TISG Reference: Section 7.3.2.2 — Effects on services and infrastructure (p. 49); Section 9.3 — Emergency management (p. 64)

Gap Identified

Section 7.3.2.2 would benefit from explicitly addressing radiological accident scenarios and their implications for local emergency response capacity.

Section 9.3 describes emergency response requirements but could be strengthened by specifying the role of the Township of Ignace and the City of Dryden as key emergency response partners, and by addressing emergency evacuation planning for workers and people living in the worker camp – should a camp be implemented.

Under Article 13 (Emergency Services) and Schedule C — Additional Benefits, Section 4 (Transportation Hub and Emergency Services Base) of the Hosting Agreement, NWMO and the Township agreed to develop a transportation hub together with emergency, medical and fire services. The TISG should require the Impact Statement to describe how this Hosting Agreement

commitment is being operationalized as part of the DGR's overall emergency management framework.

The IPRT's July 2025 review of the IPD noted that the Ignace Fire Department should be expanded and trained for nuclear emergency events, and that it should also be equipped to deliver a mine rescue service. Because vehicles operating underground will be battery-powered, the suppression of battery fires, which may have a radioactive component, should be explicitly anticipated in emergency planning.

The draft TISG currently contemplate emergency services at the DGR site, but emergency services capacity in the community of Ignace itself (serving workforce housing, permanent residents, and project-related activity off-site) would benefit from equivalent treatment.

The IPRT notes that establishing on-site emergency response capability earlier in the project lifecycle, at the site preparation phase rather than at the operations phase, would better reflect the proactive safety culture that this project warrants.

Ontario has a *Provincial Nuclear Emergency Response Plan* (PNERP). The TISG should require the Impact Statement to describe how the DGR's emergency management framework will integrate with the PNERP and how the Township of Ignace will be incorporated into that provincial framework.

Requested Amendment

- Section 7.3.2.2 should explicitly require assessment of radiological accident impacts on local services and emergency response capacity.
- Section 9.3 should require the Impact Statement to define the role of the Township of Ignace and the City of Dryden in emergency response, including facilities, training, equipment, and funding.
- Section 9.3 should require the Impact Statement to describe how the Transportation Hub and Emergency Services Base contemplated under Article 13 and Schedule C, Section 4 of the Hosting Agreement is being operationalized.
- Section 9.3 should require the Impact Statement to assess the expansion and training of the Ignace Fire Department for nuclear emergency events and mine rescue, including suppression of battery-powered vehicle fires with a potential radioactive component.
- Section 9.3 should require assessment of emergency services capacity in the community of Ignace, not only on the DGR site, serving workforce housing, permanent residents, and off-site project activity.
- Section 9.3 should require an emergency evacuation plan for workers and the worker camp (regardless of location).
- The TISG should require NWMO to commit to an on-site emergency response team at the site preparation phase, not deferred to the operations license.
- The TISG should require the Impact Statement to describe how the DGR's emergency management framework will integrate with Ontario's Provincial Nuclear Emergency Response

Plan (PNERP), including how the Township of Ignace will be incorporated into that provincial framework.

- On and off-site Emergency spill response team (fuel along hwy, railway derailment etc.). Hazardous materials management should also be included.
- Assessment of high-risk areas with mitigation plan and measures in place.
- Groundwater aquifers should be added as a sensitive receptor (Section 9.2) and not just domestic wells. Also need to consider other water supplies (municipal, small DWS, irrigation, agricultural etc.) as well as general groundwater contamination (loss of property value, impacts to human and ecological health, etc.).

Recommendation 12: Adopt a Goal-Oriented Socio-Economic Assessment

TISG Reference: Section 7.4 — Economic Conditions (p. 49–51)

Gap Identified

Recommendation 4 presents the recommended amendment for maximizing socio-economic benefits. In support of this, **Recommendation 12** presents a project appraisal and impact assessment methodology that delivers the management and avoidance of potential negative socio-economic effects and maximization of potential socio-economic benefits.

We refer to Section 7.4 of the draft TISG as it provides a solid foundation for assessing economic effects. The Township believes this section could be further strengthened by adopting a goal-oriented approach that also identifies opportunities to enhance socio-economic benefits for the host community.

The procurement enhancement language (p. 52) references Indigenous Peoples and diverse population groups and should be broadened to also include local communities.

The IPRT's July 2025 review of the Initial Project Description identified a detailed set of functions, services and facilities that Ignace expected NWMO to facilitate as part of operationalizing the Hosting Agreement. Essentially, what decisions about the DGR project can be made by NWMO to help the Township of Ignace deliver socio-economic benefits? We are concerned that these items were not carried forward into the IPD. And, they should be reflected in the TISG as the starting point for the Impact Statement's economic assessment.

The Township observes that Seaborn set out the condition that the future high level used fuel siting agency would have to achieve the *social license* from the host community. Current owners of the used fuel (e.g. OPG, NB Power, Bruce Power) further recognize that *social license* also needs to be maintained. The current owners of the used nuclear fuel build office and training facilities in their communities. Their contractors also have offices and staff in those communities. Staff live in those communities. They fund hospitals, colleges, universities, food banks and environmental programs.

We further observe that communities within North America interacting with major project proponents may prepare a socio-economic development plan. Such a plan would be an implementing mechanism for the DGR and would be an ideal mechanism for maximizing socio-economic benefits. For reference: see the New Brunswick 'Benefits Blueprint' that was developed to support the approval and construction of the Eider Rock Refinery, and in part also supported the proposed expansion of Point Lepreau Nuclear Generating Station.

As the review of the APM involves an integrated IAAC and CNSC approvals process, we note that the Reg Docs are a partial requirement. We observe that Reg Doc: <https://www.cnsccsn.gc.ca/eng/acts-and-regulations/regulatory-documents/history/regdoc2-2-5/>

requires that NWMO have a 'minimal staff complement' so as to operate the APM. The Township notes that providing supportive housing and support services in Ignace will assist in meeting its requirements.

Embedding socio-economic optimization as an explicit goal within the TISG would provide a clear framework for all parties to work toward mutual benefit. And as a result, maintain *social license*. The proposed socio-economic impact assessment methodology could involve four methodological steps:

1. Utilize the Township of Ignace's Vision as the Socio-economic Impact Assessment Goal

Objective of maximizing benefits by supporting the five community pillars:

- People
- Economics and Finance
- Infrastructure
- Community and Culture
- Natural Environment

2. Identify and appraise NWMO's DGR Project Decisions (and related decisions by others) that can maximize socio-economic benefits:

- NWMO Head office in Ignace
- Offices for NWMO's major contractors in Ignace
- Offices of the International Atomic Energy Agency (IAEA) and the Canadian Nuclear Safety Commission (CNSC),
- Appropriately sized Centre of Expertise for NWMO staff and an NWMO community training facility.
- The NWMO mock-up laboratory - in support of underground work.
- Warehousing and purchasing of food and sundry supplies.
- Worker training, meeting and conference space.
- Occupational health and safety facilities
- Consultant and administrative offices
- Security escort base of operations
- Training, monitoring, and auditing functions
- Equipment supply contracts for Ignace businesses
- Water and wastewater service provision by the Township
- Conventional waste management partnership with the Township

3. Assess socio-economic benefits for Ignace residents that would result from NWMO project decisions:

- New population levels that would support additional social and medical facilities to meet the needs of the project workforce and the permanent and temporary staff attracted to Ignace (medical specialists, hospital beds, dentists, vision/eye specialists, mental health and addictions counselling, cancer care).
- Doctors' residences located in Ignace (including a female doctor), with employment support for spouses.
- Expanded childcare and seniors' services, and shelters for women and children.
- Expansion of the Ignace Health Centre Mary Berglund
- Support for an additional grocery store and retail.
- Housing for workforce and senior staff, developed in Ignace — including accessible design (zero-step entry, wheelchair-width doors and hallways, ramps or elevators, attached garages) that can later transition to seniors housing.
- Support for airport expansion, a development charges study, and continued community open houses.
- Community recreation facilities, a library, meeting facilities.
- And, more.

4. Assess and evaluate the Socio-economic aspects of the DGR based on measures and indicators:

- # of NWMO head office workers proposed to be located in Ignace
- Floor pad size of the Centre for Expertise (appropriately sized for staff and ancillary functions,
- Presence of an NWMO training facility in Ignace
- Secondary consideration of the presence of International Atomic Energy Agency (IAEA) and the Canadian Nuclear Safety Commission (CNSC) offices
- Presence of NWMO mock-up laboratory - in support of underground work.
- Location of NWMO warehousing
- Purchasing of food and sundry supplies in Ignace.
- If not in the COE, presence of buildings that support worker training, meeting and conference space.
- Appropriately sized occupational health and safety facilities
- # of engineering and construction consultant and administrative offices located in Ignace
- Security escort base of operations located in offices in Ignace
- Training, monitoring, and auditing functions located in Ignace
- NWMO commits to equipment supply contracts for Ignace businesses
- NWMO utilizes water and wastewater service provision by the Township where appropriate
- NWMO commits to conventional waste management partnership with the Township

Recommended Amendment

- Section 7.4 should require a goal-oriented socio-economic assessment, identifying opportunities to maximize local economic participation, not just documenting effects.
- Add “local communities” alongside Indigenous Peoples and diverse population groups in the procurement enhancement requirements.
- Require the Impact Statement to assess and present plans for locating the listed functions in the Township of Ignace based on a ‘goals-oriented’ impact assessment process.
- Ignace’s own list of enhancement opportunities should be required as a reference point for enhancement measures.
- Require the establishment of monitoring indicators for community well-being across the full project lifecycle.

Recommendation 13: Clarify Methodology for Measuring Perceived Effects

TISG Reference: Section 7.5 — Mitigation and enhancement measures for health, social, and economic conditions (p. 52)

Gap Identified

Section 7.5 requires the Impact Statement to “*take into account perceived effects as identified by local peoples, Indigenous Nations and communities, and local communities.*” However, it provides no methodology for how perceived effects are to be measured, rated, evaluated, or prioritized. Perceived effects lack evidence.

The Township believes the concept of “perceived effects” would benefit from more precise framing.

In the social sciences, perceived effects can be meaningfully quantified through validated survey instruments, longitudinal studies, and established psychosocial metrics. The TISG would be strengthened by requiring this level of methodological rigour, ensuring that perceived effects are grounded in recognized social science approaches, are measurable and that assessment resources are directed toward evidence-based findings.

Recommended Amendment

- Should perceived effects be used in the assessment, Section 7.5 should require the Impact Statement to include a rigorous social science methodology for measuring and evaluating perceived effects, using validated survey instruments, longitudinal studies, and established psychosocial metrics.
- The TISG would benefit from distinguishing between evidence-based psycho-social impacts (nuclear stigma, risk perception, community anxiety) and general public perceptions, ensuring that findings grounded in recognized social science methods are given appropriate weight in decision-making.

Recommendation 14: Clarify dose information in Section 7.5

TISG Reference: Section 7.5 Mitigation and Enhancement Measures for Health, Social, and Economic Conditions

Gap Identified

The bullet on how radiation protection measures maintain doses ... and the sub-bullet on calculated doses (lines 1711-1718) do not indicate that these processes apply to both routine/normal operations and accident/off-normal events.

Recommended Amendment

- Add text indicating these dose calculations apply to both routine/normal operations and accident/off-normal events.

Recommendation 15: Clarify risk information in Section 9.1

TISG Reference: Section 9.1 Risk assessment

Gap Identified

No radiological risk consideration is specified in this section on Risk assessment. CNSC considers radiation protection as an important core control process. Although radiological risk could possibly be captured under the concept of health, radiological risk is a significant risk for the DGR project.

At a minimum, this section on risk assessment should include radiological risks such as doses to workers and the public, releases of radioactive material (including airborne), and the potential for radiological contamination to surfaces and individuals. The doses should include doses from both routine operations and accidents.

Recommended Amendment

- Add text addressing radiological risk, including for worst-case scenarios. The radiological risk should include doses to workers and the public, releases of radioactive material (including airborne), and the potential for radiological contamination to surfaces and individuals, and the application of ALARA for both routine operations and accidents.
- As appropriate, add radiation protection to the text in addition to the use of “health” in this section and section 9.2.

Recommendation 16: Refocus the Transportation Assessment

TISG Reference: Section 10.1 — Transportation of used nuclear fuel (p. 65–66); Section 10.2 — Movement of materials and people (p. 66–67)

Gap Identified

NWMO’s off-site transportation assessment is comprehensive and well-supported. The Township does not consider it necessary for the TISG to replicate detailed off-site transportation

requirements that are already addressed through CNSC's separate regulatory process and NWMO's existing studies.

The Township recommends refocusing the analysis by extending this same rigor to on-site movement of used fuel (off-loading, hot cells, dolly placement, shaft or ramp transfer), which would benefit from more detailed assessment requirements.

If a road-to-rail transfer option is pursued, the intermodal facility would benefit from further discussion within the TISG framework — including whether it forms part of the DGR project and what hazards, risks, and licensing requirements apply.

Security escort arrangements for used fuel shipments are described, and the Township sees an opportunity to have these teams based in Ignace to enhance both local economic benefit and response capability, as discussed above.

The IPRT notes that NWMO's Preliminary Transportation Plan (Appendix G, p. 524–525) references a potential consolidation of Whiteshell-stored fuel at Chalk River before shipment to the DGR. This means radioactive material would pass the Revell site and then returned to the Revell site from Chalk River. If confirmed, this routing would have implications for transportation volumes along the Highway 17 corridor. The Township would welcome clarification on this aspect of the transportation plan.

Recommended Amendment

- Section 10.1 should require the Impact Statement to refocus and assess on-site movement of used fuel with the same rigour as off-site transportation, including impact testing at transshipment points, off-loading, packaging, and placement operations.
- Require assessment of the intermodal facility (if road-to-rail), including location, hazards, and licensing requirements.
- Section 10.1 should require that the Township of Ignace be named as a first responder coordination partner.
- Section 10.2 should require assessment of locally based transportation support services (security escorts, emergency equipment, training facilities) and whether these can be located in Ignace.
- Spill response will be required on-site and along all transportation corridors.

Recommendation 17: Add an Occupational Health and Safety Requirement

TISG Reference: Section 7.2 — Health Conditions (p. 41) — gap requiring new subsection

Gap Identified

The TISG does not currently include a dedicated requirement for an occupational health and safety assessment. This is an area where the TISG could be strengthened, particularly regarding underground accident scenarios involving shafts, fires involving battery-powered vehicles, and on-site radiological exposure, which would benefit from explicit assessment requirements.

Because vehicles used underground at the DGR are proposed to be battery-powered, the suppression of battery fires, which may have a radioactive component in a nuclear facility, should be specifically addressed in the occupational health and safety assessment, alongside the associated mine rescue capability.

Recommended Amendment

- Add an explicit requirement in Section 7.2 (or as a new subsection) for assessment of occupational health and safety effects, including underground accident scenarios.
- Require worker dose assessments for all on-site activities — not just off-site transportation (which is already well addressed).
- Require a commitment to a *Radiation Protection Program* and *Radiation Protection Plan* at the site preparation stage, consistent with NWMO's commitments in their response to the Summary of Issues (NWMO-RSOI-6).

Recommendation 18: Implement Post-Closure requirement in Appendix A

TISG Reference: Appendix A, Post-closure safety case, page 5 of Appendix A

Gap Identified

Text in Appendix A states “A post-closure safety case for the entire DGR lifecycle is required at the start of each major licensing stage, from site preparation through to decommissioning ...” There does not appear to be a requirement in the TISG to present this post-closure safety case.

Recommended Amendment

- Add text requiring a post-closure safety case to the TISG, possibly as a new section.

CONCLUSION

The Township of Ignace reaffirms its strong support for the Deep Geological Repository project and its commitment to contributing to this generational infrastructure in a manner rooted in safety, science, and stewardship.

The project represents a transformative opportunity for Ignace, supporting economic diversification, employment, infrastructure renewal, population stabilization, and strengthened municipal capacity. The Township is strongly supportive of ensuring that the community is fully aligned with any and all economic activity and prosperity surrounding this multi-billion-dollar project.

The **18** recommendations in this submission are intended to strengthen the TISG so that the resulting Impact Statement:

- Recognizes the Township of Ignace as a host community with specific needs and aspirations — not merely “local peoples.”
- Requires assessment of positive socio-economic outcomes alongside adverse effects.
- Establishes a world-class nuclear safety standard befitting a project of national significance.
- Ensures the Township of Ignace has a meaningful role in oversight, engagement, and decision-making throughout the 160+ year project lifecycle.
- Addresses outstanding gaps in project design, boundary definition, emergency response, and transportation.

PREVIOUS REPORTS

REPORT 1: Recommendations For Impact Assessment Arising from The Review of The Initial Project Description (IPD) submitted February 3, 2026, and;

REPORT 2: The Township of Ignace's Review of NWMO's Response to the IAAC and CNSC Summary of Issues submitted April 15, 2026.