



Port Hope Community Health Concerns Committee
2450 4th Line
Port Hope, Ontario L1A 3V5

May 10, 2026

**Port Hope Community Health Concerns Committee (PHCHCC) Comments re
Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project**

**Comments and Recommendations to the Impact Assessment Agency
Canadian Impact Assessment Registry - Draft Integrated Tailored Impact Statement Guidelines
and Public Participation Plan.**

Comments and Recommendations:

1. A full description of the NWMO Project and potential related impacts must be presented in detail, including all project components (transportation, processing, DGR design and construction, placement of waste underground, monitoring, releases to air and water from all operations, retrievability of the wastes, performance thresholds, etc.)
2. Alternatives to the Project (e.g. continued but improved and more secure long-term storage at the reactor stations) must be included and alternative means of carrying out the project component activities must be comprehensive and detailed.
3. Long-distance transportation must be fully examined, including related exposures to radioactivity, the design and safety testing of the transportation containers, emergency responses, support for First Responders, route selection and notifications to local authorities.
4. The long-term safety and performance of the DGR multiple-barrier concept must be part of the impact assessment not put off to future license applications; the safety case must be part of this Impact Assessment Review.
5. The examination of social factors must include psychological and emotional impacts of the Project , including those relating to social divisions and to the methods of seeking consent for the project, including the consent of communities along the transportation route and in proximity to and downstream from the Revall site and the Free, Prior and Informed Consent of First Nations peoples.
6. The guidelines must direct the production of an impact statement based on scientific evidence and sustainability principles and the impact assessment process must be structured to provide a rigorous assessment process rather than an approval process with the objective of preventing and avoiding impacts rather than try to mitigate them.

7. This Project should be identified as experimental not promoted as based on “best practices” when such a project is not operational anywhere in the world, there is no history or precedents by which to judge and call it “best practice”. Rather the concept of a Deep Geological Repository (DGR) for forever dangerous high level radioactive materials is highly controversial and argued by many experts to be a dangerous plan to address a serious and mounting global toxic radioactive waste dilemma.
8. A comprehensive Impact Assessment should be held with public hearings on a Project of this magnitude and its many long-term implications for the future.
9. Transportation of all high level waste planned to travel from southern Ontario and eastern Canada to this site must be included in every step of this Project Assessment not excluded as is currently planned which is completely illogical and counter-productive.
10. A thorough examination of alternatives to the Project and alternative means of carrying it out must be included in the Impact Assessment.
11. The Initial Project Description fails to provide the necessary evidence, data and information about the Project and a detailed Project description is essential.
12. Potential effects on First Nations must be included at every step of this Project Assessment not ignored or left to some future date that may or may not happen.
13. Public Participation Plan and opportunities to date are rushed, too limited in time and scope without the necessary information, forums for cross-examination, expert and financial resources through Participant Funding, made available to ensure the public is fully and properly informed for a project of such importance.
14. If and how public opinion and input throughout the process will influence decision-making in any way is very unclear. How public participation will be meaningful and impact outcomes should be made clear in the assessment process.

Further Comments and Recommendations for Consideration:

- a) “A deep geological repository represents the internationally recognized best practice for the long-term management of used nuclear fuel. The Project provides a safe, permanent, and responsible solution that will ensure the used fuel is securely contained and isolated from people and the environment for generations to come.”

Comment: There is no operational DGR anywhere in the world yet so the promotion of a DGR as “best practice” for safe, permanent disposal of high level nuclear wastes is an idea not based on performance and factual evidence, therefore should not be permitted. It is a strongly disputed technology by many scientists and citizens who do not agree with those who claim DGRs will be the best solutions to a growing global nuclear waste problem.

- b) “The Project will provide the long-term solution needed to protect people, communities, and the environment”.

Comment: These assurances are unfounded, based on best hopes and wishful thinking not evidence-based reality as no operational DGR project exists anywhere in the world.

- c) “While Wabigoon Lake Ojibway Nation’s agreement remains confidential...”

Comment: All Agreements that enable this Project to go forward with mutual responsibilities of the parties into the future and public funds should be open and part of the Assessment process.

- d) “The Project would contain and isolate approximately 5.9 million used fuel bundles, which is the projected total inventory of used nuclear fuel estimated to be produced in Canada from the current fleet of reactors to end of life, as outlined in the NWMO’s 2024 Nuclear Fuel Waste Projections Report (NWMO, 2024). This projection is based on published refurbishment and life-extension plans for the Darlington and Bruce reactors, and the continued operation of Pickering A reactors (until end of 2024) and Pickering B reactors (until end of 2026), and on NWMO’s assumptions used for planning purposes. “

Comment: This statement of volume projections excludes future high level waste produced by Ontario OPG’s expansion plans for SMRs at Darlington or the proposed new build in Port Hope at Wesleyville, planned to be the largest nuclear power plant in the world according to Ontario’s Premier. It would appear this is only the beginning of plans for DGRs to address the growing volume of high level nuclear industry wastes either by increasing the size and/or number of DGRs at Ignace and/or proposing new ones in southern Ontario near Port Hope possibly, which is another unknown and serious concern for us.

- e) “The Project does not include: transportation of used fuel from reactor sites to the Project beyond primary and secondary access roads at the Project site, as this is regulated separately under CNSC certification and uses existing transportation infrastructure NWMO’s corporate offices or other off-site corporate infrastructure (e.g., Centre of Expertise) any capacity beyond 5.9 million bundles of fuel; increases in the proposed inventory would require approval from host communities and be approved by applicable regulators, including the CNSC as the lifecycle regulator for the Project”

Comment: Transportation of used high level radioactive waste from reactor sites in Canada to this site must be included in a proper full Assessment. The risks presented by an estimated 2-3 trucks per day for 50 years, travelling from southern Ontario and eastern Canada an average of 1800 km per day mostly over 2 lane roads with difficult weather conditions and frequent accidents must be integrated into a full Assessment, not excluded into a separate silo. Further in Canada it should be mandatory, which it is not currently, that all levels of waste and containers be properly shielded to minimize/prevent radioactive emissions to impact workers, bystanders and the public from trucks on roadways. Transportation must be thoroughly examined in a full Impact Assessment with public hearings and the ALARA Principle applied to transportation of wastes.

The above statement of volume projections excludes future high level waste produced by Ontario OPG’s expansion plans for SMRs at Darlington or the proposed new build in Port Hope at Wesleyville, to be the largest nuclear power plant in the world according to Ontario’s Premier. Clearly this is only the beginning of plans for more DGRs to address the growing volume of high

level nuclear industry wastes either by increasing the size and/or number of DGRs at Ignace and/or proposing new ones in southern Ontario near Port Hope possibly, which is another serious concern for us.

- f) “Long-term management: The eventual disposal of LLW and ILW will follow Canada’s Integrated Strategy for Radioactive Waste, which directs that LLW be placed in near-surface disposal facilities and that ILW (and certain other wastes) be disposed of in another deep geological repository, which will undergo a consent-based siting process”

Comment: See above comments that this clearly is only the beginning of normalizing more DGRs planned in Canada, an unproven, disputed proposed solution to a significant problem for the nuclear industry’s expansion plans.

- g) “While the current baseline primarily reflects non-Indigenous and municipal communities, the NWMO recognizes that Indigenous data are not yet represented.”

“Uncertainty remains regarding potential effects to Indigenous Peoples based on baseline data collection to date and therefore cannot be ruled out as carrying a non-negligible risk of significant effects.”

Comment: This lack of knowledge of possible significant risks and effects for First Nations is inexcusable and unacceptable at this stage of the process. Much more consultation and research is required in cooperation with First Nations and should be an integral part of a full Impact Assessment with public hearings.

- h) Under the NSCA, the NWMO must demonstrate the application of the ALARA principle—ensuring that potential exposures and releases are kept as low as reasonably achievable, taking social and economic factors into account

Comment: Unfortunately the requirements of CNSC’s ALARA Principle for radiation exposure (keeping radiation doses as low as reasonably achievable taking into account social and economic factors) does not prevent nuclear operations in Canada from continually producing and exposing people to ionizing radiation for the sake of the industry and in fact, enables it.

A thorough Impact Assessment with public hearings and cross-examination of evidence is necessary to understand all aspects of the project including how the ALARA Principle will be applied throughout all stages of this project to protect workers and the public.

Thank you for considering our comments, recommendations and concerns.

Yours truly,

Faye More, Chair
on behalf of the Port Hope Community Health Concerns Committee

www,porthopehealthconcerns.com
Email: porthopehealthconcerns@pm.me