

**Town of Kapuskasing – Council Comments
Integrated Tailored Impact Statement Guidelines
Canada’s Used Nuclear Fuel Project**

The Town of Kapuskasing recognizes the importance of a thorough and transparent federal review process for Canada’s Used Nuclear Fuel Project and appreciates the opportunity to provide comments as part of the integrated assessment process.

While the proposed Deep Geological Repository is not located within the Town of Kapuskasing, Council has significant concerns regarding the transportation of used nuclear fuel through Northern Ontario communities, particularly along the Highway 11 corridor, and the potential impacts on municipal infrastructure, emergency response capacity, public safety, and regional resiliency.

The Town respectfully requests that the Integrated Tailored Impact Statement Guidelines require the proponent to provide clear, measurable, and enforceable commitments addressing the following matters:

1. Emergency Response Capacity and Municipal Preparedness

Northern Ontario municipalities operate with limited emergency response resources, large geographic service areas, and significant reliance on volunteer and composite fire departments. The transportation of used nuclear fuel through the region introduces additional responsibilities and risks that municipalities are currently not equipped to manage without substantial external support.

The Town requests that the assessment specifically require:

- Comprehensive specialized training programs for both full-time and volunteer firefighters, paramedics, police services, and municipal emergency management personnel;
- Ongoing refresher training and certification standards to ensure long-term readiness;
- Clear identification of the authority responsible for delivering and funding such training;
- Dedicated funding for specialized equipment, personal protective equipment, detection devices, containment materials, and decontamination resources required for transportation-related incidents;
- The establishment of regional rapid-response resources capable of supporting small northern municipalities in the event of an accident involving used nuclear fuel transport.

Municipalities must not be expected to absorb the operational or financial burden associated with emergency preparedness for a federally regulated project.

2. Cost Recovery and Financial Protection for Municipalities

The Town strongly believes that municipalities should not incur additional costs associated with the transportation of used nuclear fuel.

The assessment should require the proponent to establish a clear and legally enforceable municipal cost recovery framework that addresses:

- Emergency response costs;
- Training and equipment costs;
- Infrastructure wear and accelerated deterioration;
- Incident management and evacuation expenses;
- Long-term monitoring and environmental remediation, where applicable;
- Administrative and emergency planning costs incurred by municipalities.

Small northern municipalities operate within limited tax bases and aging infrastructure systems. Any additional unfunded responsibilities could place significant pressure on local taxpayers and municipal service delivery.

3. Highway 11 Capacity, Safety, and Infrastructure Concerns

Council remains concerned about the potential increase in commercial motor vehicle traffic along Highway 11 associated with the transportation of used nuclear fuel.

Highway 11 is a critical transportation corridor for Northern Ontario; however, many sections of the corridor do not meet modern highway standards and are already subject to frequent closures, severe weather conditions, collisions, and infrastructure limitations.

The Town requests that the assessment include:

- A detailed transportation impact analysis evaluating cumulative increases in heavy commercial traffic volumes;
- Assessment of pavement deterioration and bridge impacts resulting from increased heavy haul transportation;
- Review of highway design standards, passing opportunities, winter maintenance challenges, and accident history;
- Evaluation of the corridor's capacity to safely accommodate additional high-risk transport movements;
- Identification of infrastructure upgrades required to safely support transportation activities before any project approvals are granted.

The transportation corridor is not only a local concern. Highway closures or incidents affect the entire Northern Ontario economy, including supply chains, emergency medical transportation, mining, forestry, tourism, and regional connectivity.

4. Public Safety and Public Awareness

Council believes that northern residents deserve transparent information regarding the transportation of used nuclear fuel and the associated safety protocols.

The assessment should require:

- A comprehensive public education and awareness strategy for municipalities located along transportation routes;
- Clear communication protocols during transportation incidents or emergencies;
- Public disclosure regarding transportation frequency, routing principles, emergency procedures, and risk mitigation measures;
- Ongoing engagement with municipalities and Indigenous communities throughout the life of the project.

Public confidence can only be achieved through transparency, accountability, and demonstrated preparedness.

5. Cumulative Regional Impacts and Northern Context

Northern Ontario communities face unique realities, including limited emergency services, long travel distances, constrained healthcare resources, harsh winter conditions, and reduced access to specialized response capacity.

The Town requests that the assessment explicitly evaluate the cumulative impacts of transporting used nuclear fuel through small and remote northern communities, including:

- Availability of emergency medical services and specialized healthcare support;
- Capacity limitations of volunteer-based emergency response systems;
- Impacts of prolonged highway closures on isolated communities;
- Potential economic and reputational impacts to municipalities along the transportation corridor.

The assessment must demonstrate, through independent evidence and transparent analysis, that the transportation of used nuclear fuel will not create additional unacceptable risks for northern municipalities or the travelling public.

6. Protection of Municipal Interests

The Town of Kapuskasing strongly believes that municipalities located along transportation corridors must be treated as active partners in the assessment and decision-making process, not simply as stakeholders.

Municipal governments are responsible for protecting public safety, maintaining local infrastructure, coordinating emergency response, and ensuring community resiliency. These responsibilities require meaningful consultation, direct involvement in emergency planning, and long-term financial protection.

Council requests that no approvals proceed until municipalities have received:

- Clear evidence demonstrating transportation safety;
- Defined emergency response roles and responsibilities;
- Guaranteed funding commitments;

- Long-term municipal protection mechanisms;
- Infrastructure assessments confirming corridor suitability for transport activities.

The Town of Kapuskasing supports responsible environmental assessment processes and recognizes the importance of national energy and waste management discussions. However, municipalities and northern residents must not bear disproportionate risk or unfunded obligations associated with the transportation of used nuclear fuel through Northern Ontario communities.

Additional Recommended Council Comments

7. Transportation Planning Must Include Northern Municipal Realities

The Town of Kapuskasing acknowledges that the NWMO has indicated that transportation planning will continue to evolve and that transportation of used nuclear fuel is expected to begin in the 2040s using existing road and/or rail infrastructure. (nwmo.ca)

However, Northern Ontario transportation corridors present unique operational challenges that differ significantly from southern urban environments, including:

- Long distances between emergency response services;
- Limited access to specialized hazardous materials teams;
- Harsh winter driving conditions;
- Frequent highway closures and reduced detour capacity;
- Limited cellular and communications coverage in remote sections of the corridor;
- Aging highway and bridge infrastructure;
- Heavy dependence on Highway 11 as a sole economic and emergency transportation route.

Council requests that these northern realities be specifically recognized as a core component of the integrated assessment process and transportation risk analysis.

8. Existing Highway Infrastructure Is Already Under Significant Pressure

The Town remains concerned that Highway 11 is already operating under increasing pressure from commercial transportation activity associated with mining, forestry, fuel delivery, and regional supply chain movements.

Any increase in specialized transportation involving used nuclear fuel has the potential to:

- Accelerate deterioration of highways and bridge structures;
- Increase collision exposure and transportation risks;
- Intensify economic disruptions during highway closures;
- Increase emergency response demands on municipalities with limited staffing and budgets.

Council submits that no transportation activities should proceed until there is:

- A comprehensive independent infrastructure capacity assessment of the Highway 11 corridor;
- A long-term provincial infrastructure investment strategy for northern highways;
- Clear evidence that transportation activities will not compromise public safety or regional economic resiliency.

Municipalities should not bear the consequences of deferred provincial highway investments while also assuming additional risks associated with federally regulated transportation activities.

9. Need for Regional Emergency Response Hubs and Mutual Aid Capacity

The NWMO has identified safety and public confidence as priorities within its transportation planning framework. (nwmo.ca)

Council believes this must translate into tangible infrastructure and operational investments within Northern Ontario communities.

The Town recommends that the assessment require:

- Establishment of strategically located regional emergency response hubs along transportation corridors;
- Dedicated hazardous materials response units capable of rapid deployment;
- Specialized response trailers and containment equipment located within Northern Ontario;
- Coordinated mutual aid agreements supported through federal and provincial funding;
- Simulation exercises involving municipalities, Indigenous communities, emergency responders, hospitals, and provincial agencies prior to transportation commencement.

Emergency preparedness cannot rely solely on existing municipal volunteer capacity.

10. Public Trust Requires Independent Oversight and Transparency

Council recognizes that the NWMO and federal regulators have stated that the transportation of used nuclear fuel is highly regulated and supported by international standards. (nwmo.ca)

However, maintaining public trust requires more than technical assurances.

The Town requests:

- Independent third-party review of transportation safety assessments;
- Public release of transportation risk studies and emergency planning documents;
- Ongoing municipal consultation throughout the transportation planning process;
- Transparent reporting on transportation incidents, near misses, inspections, and compliance measures;
- Independent verification that transportation systems remain aligned with evolving best practices and technologies over the life of the project.

Public confidence in the project depends on transparency, accountability, and demonstrated preparedness — particularly for communities located along transportation routes but outside the immediate host area.

11. Northern Communities Must Not Carry Disproportionate Risk

The Town of Kapuskasing is concerned that many municipalities located along transportation corridors may experience project-related risks without receiving direct economic benefits associated with the repository site itself.

Council submits that:

- Communities impacted by transportation activities must receive equitable consideration for infrastructure, emergency preparedness, and public safety investments;
- The assessment process must evaluate impacts on the entire transportation corridor, not solely the repository site area;
- The federal government, Province of Ontario, and NWMO must clearly define long-term liability, responsibility, and municipal protections.

Northern communities have historically managed significant economic and infrastructure pressures with limited resources. Municipalities should not be placed in a position where they are expected to manage additional high-consequence transportation risks without substantial and sustained support.

Closing Statement

The Town of Kapuskasing supports rigorous science-based environmental assessment and recognizes the importance of long-term national waste management planning. However, the transportation of used nuclear fuel through Northern Ontario raises significant concerns regarding public safety, emergency preparedness, infrastructure capacity, municipal liability, and regional resiliency.

Council respectfully requests that the Integrated Tailored Impact Statement Guidelines require clear, enforceable, and fully funded commitments that protect municipalities, emergency responders, Indigenous communities, and the travelling public before any approvals or transportation activities proceed.

Supporting references reviewed:

- [NWMO – Canada’s Plan](#)
- [NWMO – Transporting Used Nuclear Fuel](#)
- [CNSC – Deep Geological Repository Project Overview](#)