POWER WORKERS' UNION

May 10, 2026

Deep Geological Repository (DGR) of Canada's Used Fuel Project
Impact Assessment Agency of Canada
160 Elgin Street, 22nd Floor
Ottawa, Ontario K1A 0H3

Via online submission

Power Workers' Union Comments on the Draft Integrated Tailored Impact Statement Guidelines – Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel, May 10, 2026

CANADIAN UNION OF PUBLIC EMPLOYEES, LOCAL 1000, C.L.C.
244 EGLINTON AVE. E.
TORONTO, ONTARIO
M4P 1K2
TEL.: (416) 481-4491
FAX: (416) 481-7115

The Power Workers' Union (PWU) is pleased to submit comments to the Impact Assessment Agency of Canada and the Canadian Nuclear Safety Commission on the April 10, 2026 Draft Integrated Tailored Impact Statement Guidelines – Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel.

The PWU is a strong supporter and advocate for the prudent and rational reform of Ontario's electricity sector and recognizes the importance of planning for low-cost, low-carbon energy solutions to enhance the competitiveness of Ontario's – and Canada's – economy. The PWU represents the majority of the skilled workers that operate and maintain Ontario's electricity generation, transmission, and distribution systems.

As a union deeply invested in Ontario's safe, reliable, and sustainable energy infrastructure, we recognize the critical importance of:

- nuclear generation development initiatives (including large-scale nuclear, SMRs and refurbishment), and;

- the necessary nuclear waste infrastructure, provided by the proposed DGR.

We recognize that the DGR would play a crucial role as foundational enabling infrastructure for nuclear generation in both Ontario and Canada. Without a credible, consent-based, long-term waste solution, sustained refurbishment and new nuclear development would be materially constrained, and may not be feasible at scale. In this respect, the DGR is not simply a standalone infrastructure project, but a necessary component of the broader nuclear fuel cycle that underpins Canada's long-term electricity system planning, decarbonization objectives, and energy security.

The PWU, therefore, supports the development of the DGR as soon as possible. Any accelerated schedule should not compromise safety, constitutional rights or undermine the objectives of government regulatory or environmental consultative approval processes.

Sincerely,

Andrew Clunis President
Power Workers Union

Power Workers' Union Specific Comments on the **Draft Integrated Tailored Impact Statement Guidelines – Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel**

The PWU has provided our comments in the form of the two tables below:

Table 1: Recommended deletions to or modifications of draft TISG elements

Table 2: Recommended additions to draft TISG valued components.

Table 1: Recommended deletions to or modifications of draft TISG elements

Draft TISG element	Recommendation	Rationale
7.4.2 Effects on economic conditions (including 7.4.2.1 Effects on Employment and 7.4.2.2 Effects on economies and economic participation)	Wherever estimates of economic effects are provided, the proponent should also provide *either quantitative or qualitative estimates of the total uncertainty (i.e. from all sources) associated with these estimates.*	1. For adverse effects, application of the precautionary principle pursuant to s. 6(2) of the *Impact Assessment Act* requires that the uncertainty associated with estimates of adverse effects be considered. 2. For beneficial effects, the expected effects of enhancement measures also depend on the uncertainty.[1]
7.5 Mitigation and enhancement measures for health, social and economic conditions	As currently written, the TISGs require only that "opportunities" for social, economic and health enhancement measures "be identified", and that mitigation measures for same be "identified" or "described". There is no explicit requirement that the effects of mitigation or enhancement measures *be estimated* (that is, the *predicted* reduction in adverse effects or increase in positive effects). Estimates of mitigation or enhancement effects (as well as associated uncertainty) should be required. Where mitigation or enhancement measures are proposed, the proponent should	Without estimates of the extent to which identified adverse effects will be mitigated, or positive effects enhanced, there is no credible way of deciding whether proposed mitigation measures are sufficient, or whether proposed enhancement measures are cost-effective.

[1] We note s. 4 of the draft DGR TISGs is very short because it refers proponents to the *Generic Requirements of the Preparation of an Impact Statement* which has a subsection dedicated to uncertainty and bias in the section on "Assessment methodology"). However, its brevity notwithstanding, we believe that this issue is sufficiently important that, at the very least, the TISGs should explicitly refer to this issue and direct readers to the appropriate section in the *Generic Requirements*.

	estimate: the expected effectiveness of the measure, all associated uncertainties and potential biases (as per footnote 1), implementation risks, and the assumptions underlying estimated effectiveness.	

Table 2: Recommended additions to draft TISG valued components.

Valued component	Recommendation	Rationale
Addition in either 2.3 or 7: Effects on Canada's *autonomy*	The TISGs should require project proponents to estimate the effects of the project on Canada's *economic and sociocultural autonomy.*	Pursuant to s. 5. 6(a) of the *Building Canada Act*, the contribution of a proposed project to Canada's autonomy, resilience and security is a factor that may be considered in determining whether it is in the national interest. Were the DGR to be so considered, this information would be important in making an evidence-based national interest determination.[2]
Addition in either 2.3 or 7: Effects on Canada's *resilience* (more broadly than critical infrastructure resilience)	The TISGs should require project proponents to estimate the effect of the project on Canada's *economic and sociocultural resilience*.	
Addition in either 2.3 or 7: Effects on Canada's *security*	The TISGs should require project proponents to estimate the effect of the project on Canada's *economic and sociocultural security*.	
Addition in either 2.3 or 7.4.2 Effects on Canada's critical infrastructure resilience and supply chain capacity	The TISGs should require the project proponent to describe how the project may impact Canada's critical infrastructure resilience, including workforce capacity, specialized supply chain requirements, and other factors that may materially affect construction, operation, maintenance, or long-term operational continuity.	Pursuant to s. 5. 6(a) of the Building Canada Act, the contribution of a proposed project to Canada's autonomy, resilience and security is a factor that may be considered in determining whether it is in the national interest. Were the DGR to be so considered, information relating to infrastructure resilience and supply chain capacity would support evidence-based consideration of these factors where applicable.

[2] We note further that given the novelty of these VCs, proponents will need (and should expect) guidance from IAAC or the Major Projects Office on appropriate indicators and methodologies for estimating project effects on autonomy, security and resilience.

7.4.2 Effect on Economic Conditions Addition: Cumulative Economic Effects of the Development of Nuclear Infrastructure in Canada	The TISGs should require the proponent to describe interactions between the project and existing or anticipated nuclear generation infrastructure development initiatives (large-scale nuclear, SMRs, refurbishment) and how the DGR will impact these development initiatives.	Evaluation of these cumulative effects will demonstrate the extent to which the DGR enables a sustained nuclear build-out (including refurbishment, large-scale nuclear, and SMRs), and the extent to which delays or failure to approve the DGR would constrain or defer these developments. This evaluation would also support assessment of system-level implications for reliability, decarbonization, and long-term electricity cost trajectories.
7.4.2 Effect on Economic Conditions Addition: Cumulative Economic Effects of Other Electricity Development Initiatives	The TISGs should require the proponent to describe interactions between the project and existing or anticipated electricity infrastructure development initiatives that may affect demand for specialized labour, manufacturing capacity, or construction resources.	Evaluation of these cumulative effects will support successful project delivery, sustainable workforce development, avoidance of execution failure, and help maintain the long-term credibility of the nuclear build program.
7.4.2.1 Effect on Employment	The TISGs should require the proponent to assess anticipated workforce requirements by occupation and skill category, including specialized skilled trades and technical occupations required during construction, commissioning, operation, maintenance, and refurbishment activities.	This evaluation facilitates workforce planning and readiness, and supports optimal apprenticeship programs and workforce development. Moreover, the evaluation facilitates alignment with broader nuclear and electricity-sector workforce demands. While the DGR is not expected to be a large long-term employment generator relative to nuclear generation facilities, understanding workforce requirements remains important in the context of cumulative labour demand across concurrent major energy infrastructure projects.
7.4.2.2 Effects on economies and economic participation	The TISGs should require the proponent to describe anticipated procurement and supply chain requirements, including the extent to which	As noted above, Canada's economic autonomy and resilience are explicitly referenced in section 5.6(a) of the Building Canada Act. Information

	specialized goods, services, and technical capabilities are expected to be sourced domestically or internationally.	relating to procurement structures, supply chain resilience, and reliance on domestic or international sources may support evidence-based consideration of these factors where applicable.
6.6 Follow-up and monitoring of workforce availability and supply chain constraints	Follow-up programs should include monitoring of workforce availability and major supply chain constraints where these factors materially affect project delivery or economic outcomes.	Follow-up and monitoring of these economic effects inform supply chain and workforce resilience, as well as project execution risk.[3]

Conclusion

As indicated above, the PWU supports the development of nuclear infrastructure, including large-scale nuclear, SMRs and refurbishment, as well as the necessary nuclear waste infrastructure that enables this development. In particular, the DGR represents enabling infrastructure that is essential to the long-term viability and expansion of Canada's nuclear generation fleet. We therefore support a streamlined review process of the DGR that does not compromise safety, constitutional rights or undermine the objectives of government regulatory or environmental consultative approval processes.

As reflected in our recommendations, the PWU also believes that considerations relating to Canadian autonomy, resilience, and security — particularly with respect to critical infrastructure, workforce capacity, and energy-sector supply chains — are increasingly relevant to the long-term success and reliability of major electricity infrastructure projects.

The PWU has a successful track record of working with others in collaborative partnerships. We look forward to continuing to work with the the Impact Assessment Agency of Canada, the Canadian Nuclear Safety Commission and other participants to strengthen and modernize Ontario's and Canada's electricity system. The PWU is committed to the following principles: create opportunities for sustainable, high-pay, high-skill jobs; ensure reliable, affordable, environmentally responsible electricity; build economic growth for Ontario's communities; and promote intelligent reform of Ontario's energy policy.

[3] Under the *Impact Assessment Act*, follow-up "means a program for verifying the accuracy of the impact assessment of a designated project and determining the effectiveness of any mitigation measures." "Accuracy" here refers to the accuracy of estimated effects, not exclusively *adverse* effects, and not exclusively *environmental* effects. So estimated beneficial or adverse economic effects of the project should be subject validation via follow-up, in part because these data will help in refining methods for estimating these effects for the next projects, or (at a minimum) provide empirical estimates of associated uncertainty of estimated economic effects.

We believe that these comments are consistent with, and supportive of:

- Ontario's objective to build out an affordable, reliable and clean energy system to support the province's significant growth needs; and
- the federal objective of expanding and decarbonizing Canada's electricity sector to ensure it can meet future needs while remaining affordable, reliable and sustainable.

The PWU looks forward to discussing these comments in greater detail with the Impact Assessment Agency of Canada, the Canadian Nuclear Safety Commission, and other interested parties through the ongoing engagement process.

List of PWU Employers

Alectra Utilities (formerly PowerStream)
Algoma Power
Aptum Technologies (formerly Cogeco Peer 1)
Atlantic Power Corporation - Calstock Power Plant
Atlantic Power Corporation - Kapuskasing Power Plant
Atlantic Power Corporation - Nipigon Power Plant
Atura - Brighton Beach Power
Atura – Halton Hills Generating Station
Atura – Napanee Generating Station
Atura - Portlands Energy
Bracebridge Generation
Brant County Municipality
Brookfield Power Wind Operations
Bruce Power Inc.
Canadian Nuclear Laboratories (AECL Chalk River)
Capital Power East Windsor
Capital Power Goreway
CC Nuclear (formerly Abraflex)
Centre Wellington Hydro
Compass Group (Bruce, Darlington, Pickering, PLC/Brock Rd.)
Cornwall Electric
Elexicon (formerly Whitby Hydro)
Enova (formerly Kitchener-Wilmot & Waterloo North)
Enwave Windsor
EPCOR Darlington Demineralized Water Plant
EPCOR Electricity Distribution Inc.
ERTH Power Corporation (formerly Erie Thames Powerlines)
ERTH Holdings Inc.
Electrical Safety Authority
eStructure
Ethos Energy Ltd.
Great Lakes Power (Generation)
Greater Sudbury Hydro
Greenfield South Power Corporation
Grimsby Power Incorporated
Halton Hills Hydro Inc.
Hydro One Inc.
Hydro One CSO (formerly Inergi)
Independent Electricity System Operator
InnPower (Innisfil Hydro Distribution Systems Limited)
Kinectrics Inc.
Lakeland Power Distribution
Laurentis Energy Partners
London Hydro Corporation
Milton Hydro Distribution Inc.
Mississagi Power Trust
NAES
Newmarket Tay Power Distribution
North Bay Hydro
Northern Ontario Wires
Nuclear Waste Management Organization
Ontario Power Generation Inc.
Orangeville Hydro
PUC Services
Quality Tree Service
Reworld Durham York Limited Partnership (Formerly Covanta Durham York Renewable Energy)

Rogers Communications (Kincardine Cable TV Ltd.)
Sioux Lookout Hydro Inc.
SouthWestern Energy
Synergy North (formerly Kenora Hydro Electric Corporation Ltd.)
The Town of Tillsonburg
Toronto Hydro
TransAlta Generation Partnership O.H.S.C.
Westario Power