

To the Impact Assessment Agency of Canada

Re: draft Integrated Tailored Impact Statement Guidelines for the Deep Geological Repository (DGR) For Canada's Used Nuclear Fuel Project

Thank you for the opportunity to comment on the draft Guidelines for the Deep Geological Repository (DGR) Project.

A few words about my background. This includes research and teaching about climate change and energy policies for some decades. The following will certainly date me, I presented (and testified) to the Select Committee on Ontario Hydro Affairs, February 5, 1980. My topic was an "Assessment of the Management of Canada's Nuclear Waste (the Hare Report)", on behalf of Environment North.

At an attempt at brevity, my remarks will focus on the following two (2) concerns:

1. Long term decarbonization goals

I have written op eds detailing that new nuclear construction and expansion of the supply chain (uranium mining, refining, fabrication and transportation) would incur a substantial "carbon debt" during the next two decades.

NWMO states in their Initial Project Description that,

"By safely containing and isolating used nuclear fuel, it also supports the continued role of nuclear energy as a reliable, low-carbon source of power and contributes directly to Canada's climate change commitments and goal of achieving net-zero emissions."

I think it is essential that these claims contain **numbers** and **comparison** with renewable energy options.

It is difficult to take the Ford government in Ontario seriously about reducing carbon emissions. After the election in 2018, Ontario cancelled **758 signed contracts** for smaller renewable energy projects, many of them in Indigenous communities, which would likely have reduced use of fossil fuels.

2. A nuclear renaissance?

The Impact Assessment Agency of Canada is considering multiple nuclear related projects currently. The federal and especially the Ontario provincial government are trying to force a nuclear renaissance. I have included the [number of megawatts] in the list below:

- New Nuclear at Ontario Power Generation Darlington [300-megawatt SMR x 4 = 1,200]
- New Nuclear at Bruce C Project [4,800]
- New Nuclear at Wesleyville Project [10,000]

New Nuclear in Ontario: Total 16,000 megawatts

- New Nuclear at Peace River Project [4,800]

In the 1970s and 80s, Ontario Hydro, with financial support from both provincial and federal governments, built 20 CANDU reactors, at three nuclear power stations.

Déjà vu, something similar is proposed currently.

In the past Ontario Hydro was left with \$38.1 billion in debt and Ontarians continue to pay for this today. Almost 14 billion dollars of this debt remains as of 2023. As of March 2023, ratepayers were still on the hook for \$13.8 billion. ([Ontario nuclear energy plan: high costs, delays and better alternatives](#))

The nuclear industry is entrenched in the federal and some provincial governments. Currently there is extensive public advertising by the Ontario government, in various media and even on streetcars in Toronto.

The Canadian Nuclear Association, “a voice of the Canadian nuclear industry”, in cooperation with Let’s Talk Science, has developed resources for middle and high school classroom resources. (<https://teachnuclear.ca/>)

The new nuclear push threatens another expensive debt and also diverts funds from better investments for the future.

Concluding Remarks

The Hare Report (1977) was a report to “provide the government and the public of Canada with the views of an independent expert group on the subject of nuclear waste disposal. Their recommendation “that a much more open approach towards public discussion of nuclear energy policies is required still applies today.” (page 5)

In the 1990s, the Seaborn Panel, appointed an independent environmental assessment panel to review the deep geological proposal concept by Atomic Energy of Canada. The review of the concept, which was not site specific included a detailed examination by a Scientific Review Group which found almost 100 critical deficiencies in the Atomic Energy of Canada disposal concept.

Ideally this project would be evaluated by a similar independent review panel and scientific review group. Such a Commission/Inquiry/Panel could help to avoid stumbling into a future of regrets.

Best regards,
Graham Saunders