

## Requested Amendments to the Draft Tailored Impact Statement Guidelines

Line Citations	Topic	Issue Description	Proposed Amendment	Rationale	IAA (2019) Alignment
607-612	Acoustic Baselines and the Valued Component of 'Quietude'	Current noise requirements (Line 608) utilize standard industrial permissible levels (NPC-300) which are inappropriate for 'intrinsically quiet' Boreal environments where sound propagation is enhanced by atmospheric inversions and snow cover.	Amend line 608 to include: 'The proponent must establish a baseline for "Quietude" as a distinct Valued Component for receptors in Melgund Township, utilizing a minimum of one full year of seasonal acoustic data to capture sound propagation over snow and water.'	Many residents explicitly stated they moved to the area for 'total silence' (Topic: Cottage Peace and Quiet). Standard industrial noise limits do not protect the specific recreational and residential value of remote camps.	Establishing a baseline for quietude as a valued component aligns with Section 22(1)(a) and (g) by recognizing the unique acoustic environment of rural Northwestern Ontario. This amendment ensures that the proponent accounts for sound propagation over snow and water, which is critical for the well-being of local residents and the wilderness experience of recreational users. By utilizing a full year of seasonal data, the assessment fulfills the Section 6(1)(j) requirement for scientific integrity and site-specific precision in environmental monitoring.

414-421	Baseline Data Currency for Traditional Foods	The Guidelines allow the proponent to leverage existing information, but internal analysis notes that traditional food and medicine studies (Section 15.4) rely on regional data from 2014-2016. This data is outdated and lacks the site-specific precision required to establish a defensible baseline for current contaminant levels (mercury, PCBs) in local food sources.	Amend line 416 to include: 'The proponent must work with the closest impacted communities and local peoples provide contemporary (post-2024), site-specific baseline data for contaminants in traditional foods and medicines. Reliance on regional data older than five years is prohibited for the characterization of country food safety.'	Ensures scientific integrity and transparency. Internal analysis highlights that low sample sizes and aged data in the IPD undermine the 'low risk' conclusions regarding food safety.	Mandating contemporary, site-specific baseline data for contaminants in traditional foods aligns with Section 22(1)(a) by ensuring the assessment is based on current environmental conditions. This amendment supports the Section 6(1)(b) mandate for sustainable development by prohibiting reliance on outdated regional data for country food safety. Providing post-2024 data is essential for the Section 63 public interest determination to accurately evaluate the project's impact on the health of Indigenous and local communities.
1084-1087	Bioaccumulation in Aquatic Food Webs	The assessment of fish and fish habitat (Section 6.2) does not explicitly require modeling of methylmercury mobilization. Construction-related soil disturbance and hydrological changes can trigger the release of existing mercury into the food web (Ref: 606, 799), a critical concern for downstream communities like Grassy Narrows.	Amend line 1085 to include: 'The proponent must work with the closest impacted communities and local peoples to model the potential for project-related activities (e.g., blasting, dewatering, soil stockpiling) to mobilize existing environmental mercury and assess the resulting risk of methylmercury	Addresses cumulative effects and historical environmental trauma. Public comments (Ref: 345, 604) emphasize the sensitivity of the Wabigoon watershed to further industrial contamination.	Modeling the mobilization of methylmercury aligns with Section 22(1)(a) by assessing the potential for project activities to impact the health of downstream communities. This amendment supports the Section 6(1)(g) mandate to protect the rights of Indigenous peoples, such as those at Grassy Narrows, who are vulnerable to bioaccumulation in aquatic food webs. Evaluating this risk is a critical factor for the Section 63 public interest

			bioaccumulation in fish species consumed by humans.'		determination regarding the project's long-term environmental and health consequences.
831-833, 875-876	Blasting Impacts on Well Integrity	Line 876 addresses blasting in relation to surface water quality but fails to mandate an assessment of the physical and mechanical risks to the structural integrity of private well casings and the stability of subsurface aquifer fissures.	Amend line 832 to include: '...and the potential for physical damage to private well infrastructure, including casing failure or the shifting of water-bearing fissures, resulting from blasting-induced seismic vibrations during the 13-year construction phase.'	Community feedback from Melgund and surrounding area residents (Ref: 192, 800) highlights specific fears that the 'shock' of blasting will destroy expensive private wells (\$15,000 replacement cost) located only 10-13km from the site.	Assessing the physical risks of blasting on well integrity aligns with Section 22(1)(a) and (f) by addressing potential damage to local infrastructure during the construction phase. This amendment ensures that the proponent evaluates the mechanical stability of private wells and subsurface aquifers, which is essential for the health and safety of local residents. By identifying these risks, the proponent can develop appropriate mitigation and compensation protocols as required under Section 22(1)(i) and Section 63.
1276-1281	Community Co-Design and Research Governance	The guidelines use discretionary language regarding collaboration with local communities, which fails to ensure that the most proximate residents have a formal role in designing the studies that evaluate their own food security and health risks.	Amend line 1276 to include: The proponent should implement a formal Community Co-Design Framework for all socio-economic and food security and land use studies. This framework should ensure that residents of Dymont, Borups Corners, and other local	Internal analysis (Section: 15.6) and community comments (Ref: 847, 759) highlight a structural representation gap where distant municipal voices are treated as proxies for the small, unorganized and closest communities and local peoples that form the project's immediate physical footprint.	Implementing a formal Community Co-Design Framework for food security studies aligns with the Section 6(1)(g) purpose of promoting meaningful public participation. This amendment ensures that local peoples and Indigenous communities are full partners in the assessment of their own health risks, as required under Section 22. This collaborative

			peoples within 20km are full partners in defining study indicators, selecting sampling locations, and validating results that affect them.		approach is essential for the Section 63 public interest determination, ensuring that the project's impacts are validated by those most affected.
1263-1267	Community Co-Design of Socio-Economic Research	The current methodology for socio-economic baseline data is 'top-down' and relies on outdated regional census data. This excludes the 'lived experience' of those closest to the site and risks misrepresenting local social cohesion and resilience.	Amend line 1265 to include: 'The proponent must implement inclusive and participatory frameworks for all socio-economic studies. This includes the co-design of indicators and the validation of results by residents of the unorganized territories closest to the site.'	Internal analysis [Section 15.6] and community feedback [Topic: Local Participation in Studies] argue that current 'desktop studies' fail to capture the informal social fabric and volunteer-dependent nature of Melgund and the immediate surrounding area.	Implementing a Community-Based Participatory Research framework aligns with Section 22(1)(m) by ensuring that the lived experience of local peoples informs the socio-economic baseline. This approach supports the Section 6(1)(h) purpose of meaningful participation by allowing residents of unorganized territories to co-design indicators. Validating results with those closest to the site ensures that the Section 63 public interest assessment is based on accurate, community-verified data regarding social resilience.

1276-1277	Community Co-Design of Water Studies	Line 1276 uses discretionary language ('should') regarding working with the closest, most impacted communities and local peoples. This fails to ensure that residents most at risk have a say in the methodologies used to monitor their own drinking water.	Amend line 1276 to replace 'should work with' with 'must work with' and insert: 'The proponent must implement an equitable, inclusive and participatory framework with the closest impacted communities for water monitoring, allowing Melgund residents and local peoples to co-design sampling protocols and select independent laboratories for well water validation.'	Ethical research standards (TCPS 2) and community feedback (Ref: 759, 796) demand that those bearing the highest risk (Melgund) be full partners in data collection rather than subjects of proponent-led 'desktop studies.'	Implementing a Community-Based Participatory Research framework aligns with Section 6(1)(h) and Section 22(1)(m) by empowering local residents to participate in the monitoring of their own environment. This amendment ensures that the methodologies for water sampling are transparent and co-designed with those most at risk, enhancing the credibility of the assessment. By allowing for independent laboratory validation, the proponent supports the Section 6(1)(j) goal of ensuring the scientific integrity of the data used in the impact statement.
1225-1230	Crown Land Withdrawal and Foraging Compensation	The proposed withdrawal of 17,600 hectares of Crown land is not adequately addressed in terms of 'land-for-land' replacement or access mitigation for recreational and subsistence foraging (berries/medicinal plants).	Insert after line 1230: 'The proponent must provide a "Recreational Access Management Plan" that identifies alternative Crown land areas of equivalent ecological and recreational value to compensate for the permanent withdrawal of lands from the Wabigoon and Dryden Forest Management	Feedback (Topic: Loss of Crown Land Access) shows that berry picking and foraging are integral to the local way of life and household economies. A simple withdrawal without replacement constitutes a permanent loss of a recreational asset.	Requiring a Recreational Access Management Plan aligns with Section 22(1)(i) by mandating mitigation measures for the permanent loss of access to Crown lands. This amendment ensures that the proponent addresses the adverse effects on the subsistence and recreational activities of local and Indigenous peoples as required by Section 22(1)(g). By identifying alternative lands of

			Units.'		equivalent value, the proponent supports the Section 63 public interest determination by balancing industrial development with the preservation of traditional land use.
620-622	Dark Sky Preservation for Recreational Value	The guidelines for light levels (Line 620) do not account for the specific recreational value of 'Dark Skies', which is a primary draw for seasonal residents and campers.	Amend line 620 to include: 'The proponent shall provide a Dark Sky Preservation Plan, modeling the impact of facility glow on the night-sky visibility from recreational camps and lakes within a 15km radius, and identifying specific shielding technologies to maintain the wilderness character.'	Community feedback (Topic: Dark Sky Preservation) emphasizes that 24/7 industrial lighting will ruin the 'northern feel' and the recreational enjoyment of the bush at night.	The preservation of dark skies as a valued component aligns with Section 22(1)(g) by recognizing the recreational and aesthetic value of the area for local residents and seasonal visitors. This amendment ensures that the proponent considers the impact of light pollution on the wilderness character of the region, which is a key factor in the socio-economic well-being of the community. By requiring a Dark Sky Preservation Plan, the project adheres to the Section 6(1)(b) goal of maintaining environmental quality for the benefit of current and future generations.

<p>139-145</p>	<p>Data Sufficiency and Disaggregation</p>	<p>The proponent's preliminary baseline reports cited the phrase 'Data were not available for the LSB of Melgund 58 times across key metrics. This systemic knowledge gap for the closest human receptors (10-13 km from the site) undermines the predictive reliability of the impact assessment and effectively sidelines the most impacted community.'</p>	<p>Amend line 141 to include: 'The proponent must, with the community, conduct primary field research, house-by-house surveys, and community-specific data collection to fill all 58 identified data gaps for Melgund Township where secondary data was previously cited as unavailable in preliminary reports.'</p>	<p>Technical and legal integrity requires that the closest receptors are not assessed through regional generalizations or guesswork. Community feedback from Melgund residents highlights that they feel invisible in the process due to these data omissions. To not have data on almost 60 key metrics related to the closest, most impacted communities and local peoples is unacceptable.</p>	<p>The mandate to fill identified data gaps through primary field research is necessary to satisfy the Section 22(1)(a) requirement for a robust assessment of impacts. This amendment ensures that the most impacted local peoples are not sidelined due to technical deficiencies in secondary data, fulfilling the Section 6(1)(b) purpose of the Act. Reliable data is a prerequisite for a defensible Section 63 public interest determination and for the prediction of adverse effects.</p>
<p>564-569</p>	<p>Dietary Exposure Pathways</p>	<p>The radiological assessment requirements do not sufficiently link environmental releases to human ingestion via specific local diets. While line 558 mentions 'animal tissue,' it lacks a mandatory requirement for a 'Site-Specific Human Consumption Model' that accounts for the high intake rates of country foods (moose, fish, berries) reported by local harvesters (Ref: 276, 754).</p>	<p>Amend line 568 to include: 'The proponent shall develop a site-specific dietary exposure model in partnership with and for the closest impacted communities, local and Indigenous receptors, utilizing multi-season consumption data for country foods (including fish, large game, and medicinal plants) to determine potential internal dose rates from ingestion pathways.'</p>	<p>Necessary to fulfill the mandate of assessing health conditions under IAA. Public comments (Ref: 276) emphasize that harvesting is central to food security and requires rigorous safety verification beyond general biota monitoring.</p>	<p>Developing a site-specific dietary exposure model aligns with Section 22(1)(a) by ensuring that the health assessment accounts for the high intake of country foods by local harvesters. This amendment supports the Section 22(1)(m) requirement to consider community knowledge regarding multi-season consumption of fish, game, and medicinal plants. By modeling internal dose rates from ingestion pathways, the proponent provides the necessary data for a robust</p>

					Section 63 public interest determination regarding long-term radiological safety.
1251-1253	Economic Conditions and Stigma	The guidelines lack a requirement to assess the 'nuclear stigma' effect on property values for the closest non-host residents. Unlike host communities, residents in unorganized territories receive no formal benefit-sharing but bear the full brunt of potential asset devaluation.	Amend line 1251 to include: The proponent should include a quantitative study on the potential for property value devaluation for residential and recreational holdings within a 15-kilometre radius of the project site, including a proposed framework for a Property Value Protection program for these closest receptors.	Public Comments Ref 192 and 391 express deep concern that the project will devalue primary residential assets without providing the compensatory mechanisms available to incorporated municipalities.	Assessing property value devaluation and nuclear stigma aligns with the Section 22(1)(a) requirement to consider changes to the economic conditions of local peoples. This amendment ensures that the financial impacts on residents in proximity to the site are evaluated as part of the project's overall socio-economic footprint. This information is critical for the Section 63 public interest determination, particularly regarding the equitable distribution of project-related burdens and benefits.
1320-1321	Emergency Response and Health Infrastructure	The guidelines do not require an assessment of the disparity in emergency service access. Melgund has zero local fire or ambulance services and relies on distant hubs. The influx of a project workforce may 'crowd out' local access to these already strained regional health resources.	Amend line 1321 to include: 'The health information should include a capacity stress test of regional emergency medical services and primary care hubs, evaluating the risk of service displacement for local residents due to the medical needs of the project's transient	Internal analysis of Section 15.3 reveals that regional health centers are already operating near capacity. Residents in unorganized areas are particularly vulnerable to increased wait times or reduced ambulance availability caused by project-induced population surges.	Conducting a capacity stress test for regional emergency services aligns with the Section 22(1)(a) mandate to assess impacts on health and social conditions. This amendment ensures that the assessment accounts for the potential displacement of services for local peoples and Indigenous communities due to project-related demand. This data is critical for the Section 63

			workforce.'		public interest determination, ensuring that the project does not compromise the safety and health infrastructure of the most proximate residents.
313-315	Emergency Response Self-Sufficiency	The guidelines do not compel the proponent to demonstrate self-sufficiency in emergency services, potentially 'downloading' the risks of a major industrial/nuclear project onto the often volunteer-run, frequently under-resourced fire and EMS services of small municipalities and unorganized townships.	Amend line 313 to include: '...workforce accommodations, including a detailed plan for 100% on-site self-sufficiency for fire, medical, and security services to ensure no additional strain is placed on the limited emergency response capacities of unorganized territories and nearby municipalities.'	Public comments (Ref: 69, 242) and community feedback (Topic: Volunteer Capacity for Recreation) highlight that local volunteer departments lack the specialized training and equipment to handle radiological or large-scale industrial incidents.	Requiring a detailed plan for 100% on-site self-sufficiency for emergency services aligns with Section 22(1)(a) by preventing the downloading of industrial risks onto under-resourced townships. This amendment supports the Section 63(a) sustainability mandate by ensuring that the project does not degrade the limited emergency response capacities of nearby municipalities. Protecting the safety of both the workforce and local residents is a fundamental component of the Section 6(1)(b) purpose to protect health.

<p>187-194</p>	<p>Environmental Justice and Equity Working Group</p>	<p>The guidelines mention GBA Plus (Line 187) but do not provide a governance structure to operationalize it. There is no specific body to address the 'environmental racism' concerns raised by downstream and corridor communities who bear risk without benefit.</p>	<p>Insert after line 194: 'The Agency shall establish an Environmental Justice and Equity Working Group (EJEWG) to oversee the application of the National Strategy Respecting Environmental Racism and Environmental Justice Act. This group shall include representatives from downstream First Nations, the closest and most impacted local communities and peoples, and corridor municipalities to evaluate the distribution of risks versus benefits.'</p>	<p>Public comments (Ref: 430, 442, 655) from groups like the Peskotomuhkati Nation submission emphasize that proceeding without an environmental justice lens perpetuates historical patterns of dispossession. A dedicated working group is required to satisfy federal legislative obligations under the Environmental Justice Act.</p>	<p>Establishing an Environmental Justice and Equity Working Group operationalizes the Section 22(1)(s) requirement to consider the intersection of sex, gender, and other identity factors. This body ensures that the distribution of risks and benefits is evaluated through the lens of the National Strategy Respecting Environmental Racism, supporting the Section 6(1)(g) commitment to Indigenous rights. Such oversight is vital for the Section 63 public interest test, ensuring that downstream and corridor communities are not disproportionately burdened by the project.</p>
<p>868-873</p>	<p>ERMA Seepage and Shallow Aquifers</p>	<p>The guidelines do not sufficiently link the Excavated Rock Management Area (ERMA) to the shallow aquifers used by local residents and communities for drinking water.</p>	<p>Amend line 872 to include: '...including specific 3D modeling of runoff and seepage from the Excavated Rock Management Area (ERMA) into the shallow overburden aquifers utilized by residents of Melgund Township, with a focus on potential acid rock drainage and metal</p>	<p>Internal analysis (Section 9.5) identifies a 3% variance in rock composition that could lead to localized acidification. Residents require site-specific modeling to ensure this runoff does not enter their potable supply (Ref: 761).</p>	<p>Modeling seepage from the Excavated Rock Management Area into shallow aquifers aligns with Section 22(1)(a) and (g) by addressing the direct link between waste management and local drinking water. This amendment ensures that the proponent evaluates the risks of acid rock drainage and metal leaching on the specific aquifers used by residents of Melgund</p>

			leaching.'		Township. By focusing on these localized impacts, the assessment fulfills the Section 22(1)(i) requirement to identify mitigation measures that protect the health and environment of the closest human receptors.
1265-1269	Food Security and Economic Access	The Guidelines fail to explicitly require an assessment of project-induced inflation on local food costs. Internal analysis and community feedback (Ref: 391, 847) highlight that northwestern Ontario already faces a food insecurity crisis. An influx of high-salaried workers may drive up prices at limited retail outlets, further marginalizing low-income residents and seniors in unorganized territories like Melgund.	Amend line 1269 to include: 'The proponent must conduct in full partnership with the closest, most impacted communities and local peoples, a quantitative 'Project-Induced Food Price Inflation Study' that models the impact of increased regional purchasing power and supply chain strain on the cost of essential market foods for vulnerable populations in the Local Study Area.'	Legal requirement under IAA to assess changes to socio-economic conditions. Community feedback (Ref: 391) identifies food prices as a primary driver of regional vulnerability that must be decoupled from general economic benefits.	Conducting a study on project-induced food price inflation aligns with Section 22(1)(a) by assessing the socio-economic impacts on vulnerable populations in the Local Study Area. This amendment fulfills the Section 22(1)(s) requirement to consider the intersection of income and other identity factors in the health and social assessment. By modeling the strain on essential market foods, the proponent ensures that the Section 63 public interest test accounts for the marginalization of low-income residents and seniors.

1337-1338	Food Security and Subsistence Harvesting	The guidelines treat hunting and fishing primarily as recreational activities. In remote northern contexts like Melgund and the immediate surrounding area, these are essential determinants of health and food security due to high grocery costs and limited retail access. Functional loss of access to Crown land is a direct socio-economic impact.	Amend line 1338 to include: 'The description should explicitly differentiate between recreational activities and subsistence harvesting essential for local food security, and analyze in partnership with the closest and most impacted communities how land-use restrictions or perceived contamination risks may increase household cost-of-living for residents in unincorporated areas.'	Public comments (Ref: 391) indicate that for Melgund residents, land-based harvesting is integral to household economies. The DGR's encroachment on these lands risks worsening regional food insecurity, which is a recognized social determinant of health.	Differentiating between recreational activities and subsistence harvesting is essential for meeting the Section 22(1)(a) and 22(1)(c) requirements to assess impacts on socio-economic conditions and Indigenous rights. This amendment ensures that the assessment captures the critical link between land access and food security for local peoples in unincorporated areas. By analyzing household cost-of-living impacts, the proponent provides essential data for the Section 63 public interest evaluation of the project's economic consequences.
1251-1255	Food Security and Subsistence Harvesting	The guidelines do not explicitly link Crown land withdrawal to local and regional food security. In remote unorganized townships closest to the project site, land-based harvesting (hunting, fishing, foraging) is a primary economic driver and a necessary mitigation for high retail food costs.	Amend line 1251 to include: The proponent should assess, in partnership with the closest and most impacted communities and local peoples, the cascading impacts of Crown land withdrawal and restricted access on local food security, specifically quantifying how the loss of traditional harvesting	Public Comment Ref 391 identifies food insecurity as a persistent challenge in the region, where households depend on land-based harvesting to supplement diets and reduce costs.	Quantifying the impacts of Crown land withdrawal on food security is consistent with the Section 22(1)(a) and 22(1)(c) mandates to assess socio-economic conditions and Indigenous rights. This amendment ensures that the assessment recognizes the economic value of land-based harvesting for local peoples in unorganized townships. This data is essential for the Section 63 public interest determination,

			areas for moose, fish, and berries affects the household economies and cost-of-living for residents in the immediate Local Study Area.		specifically regarding the project's contribution to the economic well-being of the most impacted residents.
1148-1160	Food Security and Subsistence Harvesting	There is a total lack of baseline data regarding the subsistence economy of Melgund, businesses and local peoples living closest to the site. Residents and the most impacted, closest communities rely on land-based harvesting (hunting, fishing, berry picking) to mitigate high food costs and limited retail access, yet these patterns remain uncharacterized.	Amend line 1152 to include: The proponent should document, in partnership with the closest and most impacted communities and local peoples, site-specific harvesting patterns, species consumption rates, and food security dependencies for residents of Melgund Township and local peoples most impacted to establish a baseline for potential disruptions to local food systems and household economies.	Food insecurity is a severe challenge in remote unorganized townships. The withdrawal of 17,600 hectares of Crown land represents a permanent loss of access that must be quantified as a tangible socio-economic impact.	Documenting site-specific harvesting patterns and food security dependencies is essential for meeting the Section 22(1)(a) and 22(1)(c) requirements to assess socio-economic and Indigenous impacts. This amendment ensures that the assessment captures the unique land-based economies of local peoples in Melgund Township. This baseline data is necessary for the Section 63 public interest determination to evaluate the project's impact on the long-term food security of the region.

<p>1265-1270</p>	<p>Food Security and Subsistence Harvesting</p>	<p>The current guidelines lack a mandatory requirement for the proponent to conduct site-specific, participatory baseline sampling of country foods within the immediate 20km impact zone, relying instead on aggregated regional data that may obscure localized contamination risks.</p>	<p>Amend line 1267 to include: The proponent should conduct, in full partnership with the closest impacted communities and local peoples, site-specific, participatory sampling of traditional and country foods, including but not limited to wild rice, berries, fish, and large game, within a 20km radius of the project site to establish a robust chemical and radiological baseline. This sampling program should be co-designed with local harvesters and residents of Melgund Township to ensure it reflects actual consumption and harvesting patterns.</p>	<p>Community feedback (Ref: 391, 796) emphasizes that for residents of unorganized territories like Melgund, land-based harvesting is a primary economic driver and food source. Internal analysis notes that regional data from 55km away is scientifically inadequate for assessing property-level risks to food security.</p>	<p>Mandating site-specific, participatory sampling of country foods is essential for meeting the Section 22(1)(a) and 22(1)(m) requirements to assess health impacts and incorporate community knowledge. This amendment ensures that the assessment reflects the actual consumption patterns of local peoples and Indigenous communities. This robust baseline is necessary for the Section 63 public interest determination to ensure that the project does not pose a long-term risk to regional food security.</p>
------------------	---	--	---	--	--

729-740	Forensic Isotopic Fingerprinting	The baseline parameters for water quality (Lines 729-740) are too generic. Without forensic isotopic fingerprinting, the proponent may attribute future radionuclide detections to natural variation or historical global fallout rather than repository leakage.	Amend line 733 to include: 'The baseline data must include forensic isotopic fingerprinting for specific radionuclides of concern within 20km of the project site (e.g., Iodine-129, Cesium-137, Carbon-14) and trace metals to establish a unique chemical signature for the project site, local wells and water systems, and surrounding shallow aquifers.'	Internal analysis (Section 15) and public concerns (Ref: 795) emphasize that 'naturally elevated' metals in the Canadian Shield could be used to mask project-related impacts without a high-resolution isotopic baseline.	Requiring forensic isotopic fingerprinting aligns with Section 6(1)(j) by establishing a high-resolution scientific baseline for future environmental monitoring. This amendment ensures that the proponent can distinguish between natural variation and potential project-related leaks, fulfilling the Section 22(1)(a) requirement to assess changes to the environment. By creating a unique chemical signature for the site, the proponent provides a defensible record that protects the health of local and Indigenous communities and ensures long-term accountability.
187-193	GBA Plus and Dietary Vulnerability	The GBA Plus requirements (Line 187) are generic and do not mandate the study of 'Dietary Vulnerability.' Pregnant individuals, children, and the elderly have different physiological sensitivities to radionuclides and heavy metals in food, which must be disaggregated in the health assessment.	Amend line 193 to include: 'A GBA Plus lens must be applied to the Human Health Risk Assessment to identify disproportionate risks to pregnant individuals, infants, and children living in the closest, most impacted communities and surrounding area arising from the consumption of country foods potentially	Ensures compliance with federal GBA Plus mandates and addresses specific health concerns raised in medical-expert comments (Ref: 593, 679).	Applying a GBA Plus lens to the Human Health Risk Assessment aligns with Section 22(1)(s) by identifying disproportionate risks to pregnant individuals, infants, and children. This amendment ensures that the Section 22(1)(a) assessment of health conditions accounts for the physiological sensitivities of different demographic groups to country food contaminants. By disaggregating these risks, the

			impacted by project emissions.'		proponent provides a more accurate basis for the Section 63 public interest determination regarding the equitable protection of all local peoples.
187-193	GBA Plus and Vulnerable Populations in Unorganized Areas	The GBA Plus requirements are abstract and do not compel the proponent to address the specific demographic realities of Melgund, which includes a high proportion of seniors and low-income households who face higher barriers to participation and adaptation.	Amend line 193 to include: 'The GBA Plus analysis must specifically address the intersection of age, income, and lack of municipal services in unorganized territories. The proponent must demonstrate, working with the closest communities and local peoples, how information and mitigation measures will be made accessible to seniors with limited digital connectivity.'	Public comments [Ref: 207, 116] highlight that over 40% of the local population are seniors with limited resources. Internal analysis [Section 15.5] notes a 53% decline in youth, increasing the vulnerability of the remaining aging population.	Requiring the GBA Plus analysis to address the specific demographic realities of unorganized territories fulfills the Section 22(1)(s) mandate to consider identity factors such as age and income. This amendment ensures that the Section 6(1)(b) goal of protecting health and socio-economic conditions is met for vulnerable seniors and low-income households. By addressing digital connectivity barriers, the proponent ensures that the Section 63 public interest determination accounts for the equitable distribution of information and mitigation measures.

749-759	Groundwater and Private Well Security	Residents of Melgund Township (Dyment and Borups Corners) rely 100 percent on private wells and cisterns for potable water. The current guidelines allow for regional characterization which is hydrogeologically insufficient to protect the sole critical water infrastructure for these specific receptors.	Amend line 752 to include: For small communities like Melgund Township and surrounding unorganized areas, the proponent must provide a comprehensive, house-by-house baseline of private well water quality and quantity, including flow-rate measurements and forensic isotopic fingerprinting of radionuclides, prior to any site disturbance.	In unorganized territories with no municipal backup, groundwater is the only source of survival. Any detectable change is a significant adverse effect. Site-specific data is required to distinguish project impacts from natural variation in the Canadian Shield.	The requirement for house-by-house baseline testing of private wells is a necessary application of the Section 22(1)(a) mandate to protect the health of local peoples. This amendment ensures that the sole water source for residents in unorganized areas is monitored with scientific rigor as required by Section 6(1)(b). This forensic baseline is essential for the Section 63 public interest determination to ensure the project does not compromise the fundamental health security of the community.
1265-1269	Human Environment Baseline Data	The current guidelines for the Human Environment section lack a specific requirement to inventory and assess the condition of community centers and recreation halls in unorganized territories, which serve as the primary social infrastructure for residents in the Local Study Area.	Amend line 1265 to include: The proponent should provide a detailed inventory and condition assessment of existing community centers, recreation halls, and volunteer-led social infrastructure within the Local Study Area, with specific focus on the Dyment Recreation Hall and similar facilities in unorganized townships that lack municipal	Public comments from local and closest impacted communities (Ref: 391, 354) emphasize that community halls are the essential social anchors for Dyment and Borups Corners and local peoples living closest to the site. Without a specific baseline for these facilities, the impact assessment cannot accurately measure the risk of social disintegration or infrastructure degradation.	This amendment supports the Section 22(1)(m) requirement to consider community knowledge and the Section 6(1)(b) purpose of protecting social conditions. By mandating a detailed inventory of social infrastructure in unorganized territories, the guidelines ensure that the baseline data reflects the unique vulnerabilities of local peoples living in proximity to the project. This granular data is necessary to assess the extent to which the project may cause permanent loss of essential

			funding models.		community assets for both Indigenous and non-Indigenous residents.
156-159	Inclusion of Public in Impact Statement Review	The current DTISG text (implied by the Public Participation Plan) suggests that the Impact Statement is primarily reviewed by 'government experts and Indigenous Peoples,' potentially excluding the general public and local residents from the technical conformity review phase.	Amend line 156 to include: 'The proponent shall ensure that the draft Impact Statement and all supporting technical studies are made available for a minimum 90-day public technical review period, with specific working sessions held in the communities of Dymont and Borups Corners.'	Public comments (Ref: 126, 140, 223) characterize the 30-day window as a 'mockery' and a 'functional barrier.' A mandated 90-day review period for the public is a procedural fairness requirement for a project of this complexity.	Mandating a 90-day public technical review period aligns with Section 6(1)(h) of the Act, which aims to ensure that the public has the opportunity to participate in a meaningful manner. By holding specific sessions in Dymont and Borups Corners, the proponent addresses Section 22(1)(n) regarding comments received from the public and local communities. This transparency is essential for the Minister to determine whether the project is in the public interest under Section 63.
258-260	Informal Access and Trail Infrastructure	Section 2.2 requires mapping of 'major existing infrastructure' but ignores the network of decommissioned forestry roads and 'unofficial' trails that serve as the primary access for local recreation, trapping, and hunting in the Revell area.	Amend line 258 to include: '...major existing infrastructure, and all informal or unofficial access routes, including decommissioned forestry roads and trails utilized by local residents for ATV, snowmobile, and subsistence access within the project footprint and adjacent	Public comments (Ref: 391) and community feedback (Topic: Unofficial Trail Systems) highlight that these 'unofficial' routes are the lifeblood of local mobility. Failure to map them leads to 'unavoidable changes' (Line 1039) that are not properly mitigated.	Mapping informal access routes and decommissioned forestry roads aligns with Section 22(1)(a) by ensuring that the assessment of socio-economic conditions includes all local land-use patterns. This amendment supports the Section 6(1)(h) purpose of meaningful participation by recognizing the infrastructure utilized by local residents for subsistence and recreation. Identifying these routes is

			Crown lands.'		essential for the Section 63 determination to accurately assess the project's impact on the daily lives and food security of those in the Revell area.
379-384	Infrastructure and Service Strain	Section 4.0 identifies potential impacts on regional services but focuses primarily on emergency and road infrastructure, omitting the predictable strain on community-level recreational facilities caused by a transient workforce and secondary population growth.	Amend line 380 to include: The assessment should evaluate the potential for increased demand and physical strain on community recreation infrastructure, including community halls, parks, and arenas, resulting from the influx of the project workforce and associated secondary population growth in nearby communities.	Internal analysis of Section 15.3 and community feedback (Ref: 186) indicate that the Mary Berglund Community Health Centre and other local hubs are already at capacity. An influx of 800 workers will create a competition for space in recreational facilities that must be quantified.	The proposed requirement to evaluate strain on recreational infrastructure is consistent with Section 22(1)(a), which requires an assessment of changes to health, social, and economic conditions. This amendment ensures that the impact on the quality of life for both Indigenous peoples and local residents in proximity to the site is fully characterized. Such data is essential for the Minister to determine under Section 63 whether the project's adverse effects on community services are justified in the public interest.

1256-1262	Jurisdictional Recognition of Unorganized Communities and local peoples living closest to the site	The Guidelines currently utilize a municipal-centric model for socio-economic assessment that fails to account for the unique governance and vulnerability of unorganized territories. Melgund Township (Dymont and Borups Corners) is significantly closer to the project centroid (10-13 km) than the 'host' municipality of Ignace (45 km), yet it lacks the administrative capacity, resources and supports for meaningful participation and to manage project-induced stressors.	Amend line 1262 to include: 'The proponent must explicitly recognize and assess the unorganized communities of Dymont and Borups Corners as primary socio-economic receptors. This must include a dedicated assessment of the impacts on volunteer-based governance structures and the lack of municipal service buffers in these areas.'	Internal analysis highlights that straight-line proximity data (10 km and 13 km) places Melgund at higher risk than Ignace. Public comments [Ref: 192, 391] indicate that residents feel 'sold out' and marginalized due to their lack of incorporated status.	Explicitly recognizing unorganized communities as primary socio-economic receptors aligns with Section 22(1)(a) by ensuring that the assessment captures the unique vulnerabilities of areas lacking municipal buffers. This amendment addresses the Section 6(1)(b) mandate to consider the socio-economic conditions of local peoples who are geographically closer to the project than established municipal hubs. Such a granular focus is necessary for the Section 63 determination to accurately weigh the project's impact on volunteer-based governance and local service capacity.
1265-1270	Long-term Monitoring of Food Chains	The current monitoring commitments are deferred to later stages, leaving the closest residents without a clear understanding of how their food sources will be protected over the project's multi-decadal lifespan.	Amend line 1267 to include: The proponent should establish a long-term, community-led environmental monitoring program for local food chains. This program should provide Melgund residents and those living closest to the proposed site with the training, resources	Community feedback (Ref: 785, 754) expresses deep anxiety regarding the 'out of sight, out of mind' approach to long-term monitoring. Residents require empirical evidence of safety to maintain their land-based way of life.	Establishing a community-led long-term monitoring program for food chains aligns with the Section 22(1)(j) requirement for follow-up programs. This amendment ensures that local peoples and Indigenous communities are directly involved in verifying the project's ongoing safety, fulfilling the Section 6(1)(b) purpose of the Act. This transparency is vital for the Section 63 public

			and equipment to participate in ongoing sampling of fish and wildlife tissues, with results published in a transparent, real-time public portal.		interest determination, providing the community with the tools to monitor their own environmental health.
1276-1281	Mandatory Community Collaboration and Co-Design	The current guidelines use discretionary language ('should') regarding the proponent's engagement with local communities. For unorganized territories like Melgund Township (Dyment and Borups Corners), which lack municipal infrastructure and are the most proximate and impacted receptors (10-13km), this permissive framing fails to guarantee the 'meaningful participation' required under Section 11 of the Impact Assessment Act. Without mandatory collaboration, these communities and local peoples most impacted are at risk of jurisdictional displacement by larger, more distant municipal hubs like Ignace.	Amend line 1276 to replace 'should work with' with 'must work with'. Insert after line 1281: 'The proponent shall establish a formal Community Co-Design Framework with the Melgund Local Services Board and residents of Dyment and Borups Corners to validate baseline data collection, indicator selection, and the interpretation of socio-economic and environmental results.'	Internal analysis and public comments (Ref: 192, 354, 759) highlight that Melgund residents are the closest human receptors but feel 'sold out' and marginalized. Mandatory co-design is necessary to meet ethical research standards (TCPS 2) and ensure that the 'lived experience' of those in zero-service infrastructure areas is treated as primary evidence.	Replacing discretionary language with mandatory requirements for community co-design aligns with the Section 11 mandate for meaningful public participation. This framework ensures that the Section 22(1)(m) consideration of community knowledge is systematically integrated into the baseline data for Dyment and Borups Corners. By formalizing collaboration with the most proximate receptors, the proponent demonstrates a commitment to the Section 63(a) sustainability criteria and the protection of local governance structures.

1265-1269	Mitigation and Enhancement Measures	The guidelines do not explicitly require the proponent to propose enhancement or betterment measures for community hubs in unorganized territories, which is necessary to offset the loss of quiet enjoyment and recreational land access.	Amend line 1267 to include: The proponent should identify potential mitigation and enhancement measures for community centers and recreation infrastructure, ensuring that these facilities are upgraded or expanded to maintain community cohesion and accommodate increased usage throughout the project lifecycle.	Melgund residents (Ref: 391) have formally requested an Active Betterment Plan. In unorganized territories, the project represents a significant industrialization of the landscape; enhancing community hubs is a standard socio-economic mitigation for such large-scale impositions.	This amendment aligns with Section 22(1)(i) of the Impact Assessment Act, which mandates the consideration of mitigation measures to address adverse effects on social and economic conditions. By requiring enhancement measures for community hubs, the proponent ensures that the project contributes to the sustainability of local peoples and Indigenous communities as envisioned under Section 6(1)(a). This approach directly informs the public interest determination under Section 63 by evaluating the project's long-term benefits to the social infrastructure of unorganized territories.
150-156	Participant Funding for Proximate Receptors	There is no explicit requirement in the guidelines to ensure that the closest and most impacted communities and local peoples are provided with the financial resources necessary to hire independent experts to review food security and radiological data.	Amend line 156 to include: The proponent should provide dedicated participant funding and technical resources to local peoples and community organizations located within 20km of the project site. This funding should be sufficient to enable these parties to	Public comments (Ref: 192, 800) point out that residents in unorganized townships lack the municipal tax base or administrative capacity to independently manage the impacts of a major nuclear project, creating a procedural inequity.	Providing dedicated participant funding to the most proximate local peoples aligns with the Section 6(1)(g) purpose of ensuring meaningful public participation. This amendment ensures that Indigenous communities and local residents have the technical resources to engage with complex data, as required for a fair assessment under Section 22. Such funding is a critical component of the

			meaningfully participate in the co-design of baseline studies and to retain independent expertise for the review of technical data related to food security and environmental health.		Section 63 public interest determination, ensuring that the assessment process is transparent and inclusive.
752-755	Private Well Baseline Data	The current guidelines at line 752 only require the 'identification' of domestic and communal wells. This is a technical deficiency because identification without a verified, multi-season water quality baseline prevents the objective measurement of future contamination or drawdown impacts for residents 100% dependent on groundwater.	Amend line 752 to include: 'The proponent must conduct a comprehensive, house-by-house hydrogeological audit and water quality baseline for all private, domestic, and communal wells within a 20 km radius of the project centroid. This must include seasonal sampling for a minimum of two years prior to any site disturbance or blasting to establish a legally defensible pre-project record.'	Residents of Melgund Township (Dyment and Borups Corners) have no municipal water backup and are entirely dependent on private wells (Public Comment Ref: 761, 795). A house-by-house baseline was previously implemented in South Bruce and is required here to ensure procedural equity and scientific rigor.	Conducting a multi-season hydrogeological audit for all private wells aligns with Section 22(1)(a) and (g) by establishing a rigorous baseline for the most critical resource in the Local Study Area. This amendment ensures that the proponent accounts for seasonal variations in water quality and flow rates, providing a legally defensible record prior to site disturbance. Such detailed data collection is essential for the Section 6(1)(j) requirement of scientific integrity and for the long-term protection of the health of local and Indigenous peoples.

752-755	Private Well Water Security	<p>The guidelines require identification of potable resources but do not mandate property-level baseline testing. Residents in Melgund are 100% dependent on private wells and face risks from blasting-induced vibration and hydrogeological drawdown that are not addressed by regional monitoring.</p>	<p>Amend line 752 to include: 'The proponent must conduct a mandatory, house-by-house baseline water quality and structural integrity audit of all private wells and cisterns within a 15-kilometre radius of the project centroid prior to any site disturbance or blasting.'</p>	<p>Community feedback (Topic: Groundwater and Lake Health) and Internal Analysis (Section 15.7) emphasize that for these residents, groundwater is the 'sole critical infrastructure.' A regional characterization is scientifically inadequate for property-level risk.</p>	<p>A mandatory house-by-house baseline water quality and structural integrity audit aligns with Section 22(1)(a) by addressing the specific risks of blasting-induced vibration and hydrogeological drawdown. This requirement supports the Section 6(1)(b) mandate to protect the health of local residents who are 100% dependent on private wells. Establishing this granular baseline is necessary for the Section 63 public interest determination to ensure that any future impacts on private infrastructure are accurately identified and mitigated.</p>
1263-1267	Procedural Equity and Research Ethics	<p>The current guidelines utilize discretionary language regarding community collaboration, which allows the proponent to impose 'top-down' research models that exclude local knowledge from the design of baseline studies.</p>	<p>Amend line 1263 to include: The proponent must implement a formal Community Co-Design Framework for all socio-economic, health, and land-use studies, ensuring that residents of the closest unorganized communities and local peoples most at risk of impacts from this proposed project are full and active partners in</p>	<p>Internal analysis and Public Comments such as Ref 256 argue that studies conducted without local co-design risk mischaracterizing conditions and violating ethical research standards for impacted populations.</p>	<p>Implementing a Community Co-Design Framework aligns with the Section 22(1)(m) requirement to consider community knowledge and the Section 6(1)(g) purpose of promoting public participation. This amendment ensures that local peoples and Indigenous communities are active partners in the assessment process, enhancing the credibility of the baseline studies. Such procedural equity is a key factor in the Section 63 public interest</p>

			defining study parameters, selecting indicators, and validating results.		determination regarding the project's social license and legitimacy.
1265-1270	Psychosocial Health and Community Stigma	The repeated omission of Melgund data in NWMO reports has created a sense of procedural exclusion and invisibility, leading to measurable community anxiety and social fracture that is not captured in the current health baseline.	Amend line 1269 to include: The proponent must evaluate the psychosocial impacts of project-related stigma and the perceived exclusion from decision-making processes on the residents of Dyment and Borups Corners and those living closest to the site, utilizing established federal social determinants of health frameworks.	Community feedback indicates that the 'divide and conquer' approach and data neglect have caused significant mental health stress and community disintegration, which are valid health impacts under the Impact Assessment Act.	Evaluating the psychosocial impacts of procedural exclusion and stigma aligns with the Section 22(1)(a) mandate to assess health and social conditions. This amendment ensures that the assessment considers the mental well-being of local peoples and Indigenous communities as a determinant of health under Section 6(1)(h). Such analysis is critical for the Section 63 public interest determination, particularly regarding the project's impact on social cohesion and community trust.
1256-1260	Psychosocial Health and Social Cohesion	The guidelines do not adequately address the psychosocial harm caused by community fracture and 'nuclear anxiety.' The site selection process has already established an impact pathway for social disintegration that requires formal measurement.	Amend line 1256 to include: The proponent must, in full participation with the closest impacted communities and local peoples, assess the psychosocial impacts of the project on local communities, with specific indicators for social fracture, community disintegration, and	Public Comments Ref 87 and 196 identify mental health and community division as tangible social costs that have not been quantified in the current assessment framework.	Assessing psychosocial impacts and social fracture aligns with the Section 22(1)(a) requirement to consider changes to the health and social conditions of local peoples. This amendment ensures that the assessment captures the long-term mental well-being impacts on Indigenous communities and proximate residents as required by Section 6(1)(h). These

			chronic stress related to the long-term management of high-level radioactive waste.		indicators are necessary for the Section 63 public interest determination to evaluate whether the project fosters or undermines community sustainability.
1318-1319	Psychosocial Health and Stigma	The current health condition requirements do not adequately address the 'nuclear anxiety' or community fragmentation caused by the site selection process. The psychological impact of living in the immediate shadow of a high-level waste facility is a non-biophysical health consideration that remains unquantified.	Amend line 1318 to include: 'The description of mental well-being must include an assessment of psychosocial stressors, including nuclear anxiety, community polarization, and the potential for further social disintegration resulting from the perceived stigma of proximity to the repository.'	Internal analysis and community feedback (Ref: 196, 159) highlight that the project has already engineered community trauma and social fracture. A determinants of health approach must account for these intangible but significant impacts on community cohesion.	Addressing psychosocial stressors such as nuclear anxiety and community polarization is a direct application of the Section 22(1)(a) requirement to assess health and social impacts. This amendment ensures that the assessment considers the mental well-being of local peoples and Indigenous communities as a core component of the human environment under Section 6(1)(h). Such analysis is vital for the Section 63 public interest determination, particularly regarding the project's impact on social cohesion and long-term community stability.

1320-1321	Receptor Identification and Proximity	The guidelines utilize aggregated demographic profiles that group unincorporated communities with distant municipal hubs, creating a geographic aggregation bias. Residents of Dymont and Borups Corners are the closest human receptors to the project site (10-13 km), yet the current requirements do not mandate a distinct baseline for these high-exposure groups.	Amend line 1320 to include: 'The proponent must provide a distinct demographic and health profile for the unincorporated communities of Dymont and Borups Corners, separate from the Township of Ignace and the City of Dryden, to account for their immediate proximity to the project centroid and unique service-level vulnerabilities.'	Internal analysis highlights that straight-line distance measurements oversimplify impact zones. Melgund residents are significantly closer to the site than Ignace residents and require a disaggregated baseline to accurately measure project-induced changes to health and social conditions.	The requirement for disaggregated demographic and health profiles for the closest human receptors is necessary to satisfy the Section 22(1)(a) mandate for accurate impact prediction. This amendment prevents geographic aggregation bias, ensuring that the unique vulnerabilities of local peoples in Dymont and Borups Corners are not obscured by distant municipal data. Such precision is required to fulfill the Section 6(1)(b) purpose of the Act and to inform a fair Section 63 public interest determination.
780-791	Receptor-Specific Drawdown Modeling	The 3D numerical groundwater flow model (Line 780) is currently described in regional terms. It lacks a requirement for receptor-specific sensitivity analysis for the closest human receptors in unorganized territories.	Amend line 789 to include: '...and provide a specific sensitivity analysis of groundwater drawdown impacts on the static water levels and recharge rates of private wells in the communities of Dymont and Borups Corners and the immediate surrounding area, accounting for peak industrial water demand during construction.'	Internal analysis (Section 19.2.3.4) notes that risk characterization is currently speculative. Residents living 10km away require quantitative proof that project water takings will not render their shallow wells dry (Ref: 795, 391).	Requiring receptor-specific drawdown modeling aligns with Section 22(1)(a) and (g) by focusing on the direct impacts of groundwater use on the closest human receptors. This amendment ensures that the proponent conducts a sensitivity analysis for private wells in unorganized territories, addressing the specific risks of peak industrial water demand. By quantifying these impacts, the proponent fulfills the Section 22(1)(i) requirement to identify necessary mitigation measures

					for the protection of local water security.
1265-1270	Recreational Carrying Capacity and Workforce Influx	The guidelines do not require an assessment of the 'carrying capacity' of local recreational infrastructure (boat launches, small docks, and quiet fishing holes) in light of the 800-person temporary worker accommodation camp, which risks displacing local users.	Insert after line 1269: 'The proponent shall conduct a Recreational Carrying Capacity Study for all public boat launches, docks, and inland lakes within a 50km radius of the project site, modeling the impact of the temporary workforce on local access and resource competition.'	Residents in Dymont and Borups Corners expressed significant concern that local recreation spots will be 'overrun' by the new workforce (Topic: Overcrowding of Recreation Spots), impacting local food security and quality of life.	Conducting a recreational carrying capacity study aligns with Section 22(1)(g) and (ii) by assessing the cumulative pressure of a temporary workforce on local infrastructure. This amendment ensures that the proponent evaluates the potential for displacement of local and Indigenous users from public boat launches and fishing areas. By modeling resource competition, the proponent can develop effective mitigation strategies under Section 22(1)(i) to maintain the quality of life for residents in the Local Study Area.
1343-1344	Sensitive Receptors in Unorganized Territories	The list of sensitive receptors focuses on institutional facilities (schools, hospitals) typically found in incorporated towns. It overlooks the unique social anchors of unorganized townships, such as community halls, which serve as the primary hubs for social well-being and emergency gathering.	Amend line 1343 to include: 'The list of sensitive receptors should explicitly include community social anchors in unorganized territories, such as the Dymont Recreation Hall, and evaluate potential project-related disruptions to their role in supporting community social	Community feedback identifies the Dymont Recreation Hall as the heart of the community. As a sensitive receptor, its functional use for recreation and social gathering must be protected from project-related noise, traffic, and industrialization.	Including community social anchors in unorganized territories as sensitive receptors aligns with the Section 22(1)(a) requirement to assess impacts on social and health conditions. This amendment ensures that the assessment recognizes the unique social structures of local peoples and Indigenous communities who rely on these hubs for well-being and emergency response. Such

			well-being.'		identification is necessary to satisfy the Section 6(1)(b) purpose of the Act by preventing the degradation of essential social environments.
1256-1262	Social Determinants of Health and Well-being	The current framing of social conditions in Section 7.0 does not explicitly link the quality and accessibility of community gathering spaces to the psychosocial health of the local population.	Amend line 1256 to include: The assessment of social conditions should explicitly consider the impact of project activities on the accessibility, quality, and continued viability of community-identified recreational hubs and gathering spaces as a determinant of psychosocial health and community well-being.	Community feedback (Ref: 196, 87) highlights that nuclear anxiety and social division are significant risks. Viable community centers are critical for maintaining the social fabric and providing spaces for the 'relational transparency' required for project acceptance.	The explicit linkage of community gathering spaces to psychosocial health aligns with the Section 22(1)(a) mandate to assess impacts on human health. This amendment ensures that the assessment captures the non-biophysical determinants of well-being for local peoples and Indigenous communities, as required under the Section 6(1)(h) purpose of the Act. Evaluating the continued viability of these hubs is critical for the Section 63 public interest determination regarding the project's overall impact on community cohesion.

1256-1269	Socio-Economic Baseline Disaggregation	The current guidelines allow for aggregated regional socio-economic reporting, which utilizes 'aggregation bias' by grouping the unorganized communities of Melgund Township (Dyment and Borups Corners) with the broader Kenora Census Division. This masks the acute, site-specific impacts on the closest human receptors located only 10-13 km from the project centroid.	Amend line 1265 to include: 'The proponent must provide fully disaggregated baseline data for the unincorporated communities of Dyment and Borups Corners. This data must be treated as a primary receptor group distinct from the Township of Ignace and the City of Dryden to ensure localized impacts on property values, social cohesion, and community services are accurately quantified.'	Internal analysis highlights that Melgund residents operate in a 'zero-service infrastructure reality' and are the most proximate human receptors. Public comments (Ref: 192, 391) emphasize that these residents feel marginalized by regional aggregation that favors larger population centers.	Providing disaggregated baseline data for Dyment and Borups Corners aligns with Section 22(1)(a) by ensuring that the assessment of socio-economic conditions is not obscured by regional aggregation. This amendment supports the Section 22(1)(s) requirement to consider identity factors and localized impacts on the most proximate human receptors. By treating these unorganized communities as distinct receptors, the proponent ensures that the Section 63 public interest determination is based on a precise understanding of site-specific social cohesion.
354-357	Socio-Economic Betterment and Monitoring Committee	The current guidelines rely on triennial reporting (Line 356) and generic regional data, which masks localized social fracture and community disintegration in the Local and Regional Study Areas. There is no mechanism for the closest communities to manage the 'Community Protection Fund' or mitigate project-induced inflation and housing	Amend line 356 to include: 'The proponent shall establish a Regional Socio-Economic Monitoring Committee (RSEMC) with a dedicated sub-table for unorganized territories. This committee will meet quarterly to review real-time data on housing costs, service wait times, and social	Internal analysis and comments (Ref: 159, 183, 847) highlight the risk of 'boom-town' effects and 'social fracture.' A quarterly monitoring committee is required to move from passive reporting to active, adaptive management of social impacts.	Establishing a Regional Socio-Economic Monitoring Committee directly supports the Section 63(a) requirement to consider a project's contribution to sustainability through ongoing oversight. The focus on real-time data for unorganized territories ensures that the Section 22(1)(a) assessment of socio-economic conditions remains accurate for the most impacted local communities. This mechanism facilitates the

		pressure.	cohesion markers in Dymont and Borups Corners.'		meaningful participation of local peoples as envisioned under Section 6(1)(h) by providing a structured role in mitigating project-induced social pressures.
1265-1269	Socio-economic Data Integrity	The current guidelines allow for the aggregation of socio-economic data within broad census divisions, which creates a technical deficiency known as aggregation bias. This masks the specific vulnerabilities and baseline conditions of the unincorporated communities of Dymont and Borups Corners and those living closest to the proposed site, which are the closest human receptors to the project site.	Amend line 1265 to include: The proponent must provide fully disaggregated socio-economic baseline data specifically for the unincorporated communities of Dymont and Borups Corners, rather than relying on aggregated data from the Kenora Census Division, to ensure localized impacts on these closest receptors are accurately characterized.	Section C and Public Comment Ref 391 highlight that Melgund Township residents are treated as a peripheral regional subset despite being significantly closer to the site (10-13 km) than the identified host municipality of Ignace (35 km).	Providing disaggregated socio-economic data for the closest receptors is essential for meeting the Section 22(1)(a) requirement to accurately characterize baseline conditions. This amendment ensures that the specific vulnerabilities of local peoples in unincorporated communities are not masked by regional averages, fulfilling the Section 6(1)(b) purpose of the Act. This level of detail is required for the Minister to make an informed Section 63 public interest determination based on localized impacts.

1251-1255	Stigma and Behavioural Modification	The guidelines fail to require an assessment of 'behavioural modification'—where residents and tourists avoid traditional lands and waters due to the 'nuclear' label and perceived risk, regardless of technical safety data.	Amend line 1252 to include: '...and the positive and negative consequences of those changes, including behavioural modification and land-use avoidance by local residents and tourists resulting from the stigma of radiological risk and its impact on the regional "Sunset Country" brand.'	Internal analysis (Section 15.6) and public comments (Ref: 141, 242) identify 'perception-based impacts' as a primary driver of socio-economic decline in tourism-dependent regions like Northwestern Ontario.	Assessing behavioral modification and land-use avoidance due to radiological stigma aligns with Section 22(1)(a) regarding impacts on health and socio-economic conditions. This amendment supports the Section 63(a) sustainability mandate by evaluating how perceived risks may alter the traditional activities of local and Indigenous peoples. By quantifying the impact on the regional brand, the proponent ensures that the Section 63 public interest test accounts for the psychological and economic consequences of the project's presence.
196-198	Technical Advisory Group Representation	Line 196 allows for the establishment of technical advisory groups but does not mandate the inclusion of representatives from the most proximate unorganized territories. This creates a representation gap where technical decisions regarding groundwater, noise, and blasting—which most acutely affect Melgund—are made	Amend line 197 to include: '...technical advisory groups, which shall include, at minimum, one technical representative or designated member from the closest and most impacted proximate communities and other unorganized territories within a 20km radius of the project centroid.'	Community feedback (Ref: 761, 800) indicates a total lack of trust in proponent-led technical summaries. Including local representatives in advisory groups ensures that site-specific vulnerabilities (like 100% well-water dependency) are addressed by the experts making the safety case.	Mandating representation for unorganized territories on technical advisory groups aligns with Section 22(1)(n) by ensuring that the primary receptors of noise and blasting impacts have a direct voice in the assessment. This inclusion supports the Section 6(1)(h) purpose of fostering meaningful participation for those living in the closest proximity to the project centroid. By integrating local technical representatives,

		without the input of the primary receptors.			the Agency ensures that the Section 63 public interest determination is informed by the specific concerns of the Melgund Local Services Board.
1251-1255	Tourism Stigma and Wilderness Brand Devaluation	Section 7 lacks a technical requirement to quantify the economic impact of 'nuclear stigma' on the outfitting and eco-tourism sector, which relies on the 'pristine' reputation of the Northwestern Ontario wilderness.	Amend line 1251 to include: 'The assessment must include a quantitative and qualitative analysis of "perception-based" economic impacts, specifically the potential for "nuclear stigma" to reduce bookings for local outfitters, lodges, and eco-tourism operators in the Sunset Country region.'	Internal analysis and community feedback (Topic: Tourism Stigma) highlight that the 'wilderness brand' is the primary capital of the region. Even without a leak, the presence of the facility alters the marketability of the area for high-value eco-tourism.	Analyzing perception-based economic impacts aligns with Section 22(1)(g) by addressing the potential for nuclear stigma to devalue the regional tourism brand. This amendment ensures that the proponent evaluates the economic risks to outfitters and eco-tourism operators who rely on the pristine reputation of Northwestern Ontario. By quantifying these impacts, the assessment provides a more comprehensive basis for the Section 63 public interest determination, particularly regarding the long-term economic sustainability of the region.

369-374	Transportation Corridor Socio-Economic Impacts	The DTISG limits the assessment of transportation impacts to the immediate vicinity of the site. This ignores the socio-economic risks (anxiety, emergency response strain, traffic delays) for communities along the 1,700 km route from Southern Ontario.	Amend line 374 to include: 'The socio-economic assessment must extend to all communities along the primary transportation corridors. This must include an evaluation of the psychological impact of radioactive waste transport and the capacity of volunteer emergency services along the route to manage incidents.'	Public comments [Ref: 112, 242, 255] and community feedback [Topic: Highway Safety for Campers] emphasize that the project is a 'national-scale infrastructure system' and transport is an inseparable component.	Extending the socio-economic assessment to the entire transportation corridor aligns with Section 22(1)(a) by considering the full extent of the project's effects on health and social conditions. This amendment addresses the Section 63(a) sustainability mandate by evaluating the psychological impacts and emergency response strains on all communities along the 1,700 km route. By including corridor municipalities and Indigenous groups, the proponent ensures that the Section 6(1)(h) goal of meaningful participation is applied to all impacted stakeholders.
1265-1269	Unorganized Territory Infrastructure Capacity	The guidelines group local communities together without acknowledging the unique fiscal and administrative vulnerabilities of unorganized townships that rely on volunteer-run recreation services.	Amend line 1269 to include: The proponent should conduct a specific capacity and resilience audit of recreation infrastructure in and with unorganized territories, where municipal funding and administrative buffers are absent, to ensure project-related impacts do not lead to the permanent loss of these	Internal analysis of Section 15.7 and Ref 354 note that communities like those in the Township of Melgund operate in a zero-service infrastructure reality. The DGR project risks 'crowding out' local residents from their own volunteer-run spaces if capacity is not specifically managed.	This amendment addresses the Section 22(1)(a) requirement to assess socio-economic impacts by recognizing the unique fiscal vulnerabilities of unorganized townships. By conducting a capacity and resilience audit, the proponent fulfills the Section 6(1)(a) objective of fostering sustainability for the most impacted local peoples. This specific focus ensures that the Section 63 public interest analysis accounts for the

			essential community assets.		potential permanent loss of community assets in areas lacking municipal administrative buffers.
749-755	Water Security and Food Processing	The guidelines fail to recognize the intersection between private well water quality and the ability of local residents to safely process and preserve harvested foods, which is a core component of regional food security.	Amend line 752 to include: The proponent must assess the cascading impacts of potential groundwater degradation on regional food security. This must include an evaluation of how changes in private well water quality or quantity would affect the ability of residents in Melgund Township to process, clean, and preserve harvested fish and game.	Internal analysis (Ref: 761) notes that for residents reliant on private wells, groundwater is the foundational infrastructure for the subsistence economy. Any detectable change in water quality threatens the safety of the entire local food chain.	This amendment aligns with Section 22(1)(a) of the Impact Assessment Act by ensuring that the assessment accounts for changes to the health, social, and economic conditions of local residents in Melgund Township. By linking groundwater quality to food processing and regional food security, the proponent fulfills the Section 6(1)(b) mandate to promote sustainable development. This requirement ensures that the impacts on both Indigenous and non-Indigenous peoples living in proximity to the site are rigorously evaluated within the public interest framework of Section 63.

749-759	Water Security and Private Well Baselines	The current guidelines for groundwater characterization are too generic for communities with 100% reliance on private wells. In Melgund, there is no municipal water backup, making any contamination a catastrophic socio-economic event. The current text lacks a requirement for property-specific baseline testing.	Amend line 752 to include: 'The proponent must conduct a mandatory house-by-house baseline water quality and flow-rate audit for all private wells and communal water sources within a 20 km radius of the project centroid prior to any site disturbance or blasting.'	Community feedback [Topic: Melgund Lake Protection, Groundwater and Lake Health] and internal analysis emphasize that residents are 100% dependent on private wells. A site-specific baseline is required to distinguish project impacts from natural variation.	Conducting a house-by-house baseline water audit aligns with Section 22(1)(a) by providing the necessary data to assess potential changes to the health and socio-economic conditions of local residents. This requirement supports the Section 6(1)(b) purpose of promoting sustainable development by protecting the only water source for Melgund residents. Establishing this baseline is essential for the Section 63 public interest determination, as it provides a clear benchmark for monitoring and mitigating future contamination risks.
752-755	Water Security for Food Processing	Residents in unorganized territories (Dyment, Borups Corners) rely 100% on private wells for drinking and food processing (cleaning fish/game). The Guidelines (Line 752) require identification of wells but not a mandatory baseline of water quality for every household in the immediate impact zone (Ref: 192, 795).	Amend line 752 to include: 'The proponent must establish a mandatory, house-by-house baseline water quality and flow-rate record for all private and communal wells within a 15-kilometre radius of the project centroid prior to any site disturbance.'	Protects critical infrastructure for human habitation and food safety. Community feedback (Ref: 795) highlights that without a verified baseline, residents have no recourse if blasting or seepage affects their only water source.	Establishing a mandatory house-by-house baseline for all wells within 15 km aligns with Section 22(1)(a) by protecting the primary water source for residents in Dyment and Borups Corners. This requirement supports the Section 63(a) sustainability mandate by ensuring that the proponent is held accountable for any changes in water quality or flow-rate. By securing this data prior to site disturbance, the proponent fulfills the Section

					6(1)(b) purpose of protecting the health and socio-economic well-being of the most proximate communities.
824-827	Water Security Guarantee	The Site Water Management Plan (Line 824) focuses on project-internal water fluxes but lacks a mandatory protocol for immediate emergency response if local drinking water supplies are compromised.	Amend line 824 to include: '...and a legally binding Water Security Guarantee. This plan must outline enforceable protocols for the immediate provision of alternative potable water and permanent well replacement for any household in the Local Study Area experiencing quality or quantity disruptions, regardless of whether the causal link is still under scientific review.'	Groundwater is the sole critical infrastructure for human habitation in Melgund (Ref: 761). The proponent must act as an active partner in regional resilience rather than a passive observer of impacts (Internal Analysis Section 15.7).	The inclusion of a legally binding Water Security Guarantee aligns with Section 22(1)(i) and Section 63 by providing immediate and enforceable mitigation for local residents. This amendment ensures that the proponent is held accountable for any disruptions to drinking water quality or quantity, regardless of the complexity of the causal link. By guaranteeing alternative water supplies, the project adheres to the Section 6(1)(g) purpose of protecting human health and the public interest for the most impacted local communities.