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Impact Assessment Agency of Canada
Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project Registry

Bruce Power Submission to IAAC for Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project

This written submission by Bruce Power is in response to the April 10th, 2026, invitation for Public Comments on the draft Integrated Tailored Impact Statement Guidelines (TISG) the Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project (the Project). The purpose of this submission is to provide information on the existing legislative framework for the long-term management of used nuclear fuel in Canada as well as express Bruce Power's support for the scope of assessment outlined in the draft TISG with respect to the transportation of used nuclear fuel.

A Robust Framework for Management of Canada's Used Nuclear Fuel

Canada's framework for the long-term management of used nuclear fuel is clearly established under the *Nuclear Fuel Waste Act* (SC 2002 c 23). The act sets out that all costs for the permanent storage/disposal of radioactive waste, including used nuclear fuel, are to be fully funded by waste generators/owners in a trust, ensuring no financial burden is left to future generations and mandates the establishment of an organization responsible for the long-term management of nuclear waste in Canada.

The Nuclear Waste Management Organization (NWMO) was established in accordance with this legislation as a not-for-profit entity responsible for designing and implementing Canada's plan for the safe, long-term management of used nuclear fuel. Since 2010, the NWMO has conducted a phased, multi-year, community-driven selection process which ultimately led to the selection of the Wabigoon Lake Ojibway Nation-Ignace area as the proposed site for the DGR. Canada's approach to long-term management of used nuclear fuel using deep geological disposal is the culmination of more than 30 years of research, development and demonstration of technologies and techniques and reflects international best practices.

Transportation of Used Nuclear Fuel – Section 10 of Draft TISG

The transportation of nuclear waste and used nuclear fuel in Canada is jointly regulated by the Canadian Nuclear Safety Commission (CNSC) and Transport Canada. It is one of the most highly regulated class of dangerous goods in Canada, already subject to a comprehensive and stringent federal regulatory regime including:

- Transport Canada – *Transportation of Dangerous Goods Act, 1992* (SC 1992, c 34) and associated regulations; and



- Canadian Nuclear Safety Commission – *Packaging and Transport of Nuclear Substances Regulations (SOR/2000-202)* enacted pursuant to the *Nuclear Safety and Control Act*.

Combined, these provisions create a framework that governs the entire lifecycle of the transportation of used nuclear fuel including: package design, testing and certification, radiological protection of workers, the public and the environment, safety and security requirements during both routine and accident conditions, and emergency preparedness and response obligations. Additionally, the NWMO has clearly articulated, pre-existing plans that outline the initial, multi-layer safety framework for transporting used nuclear fuel to a deep geological repository starting in the 2040s.

For these reasons, Bruce Power supports the approach outlined in the Project's draft TISG which calls for an update to the NWMO's *2021 Preliminary Transportation Plan* for used nuclear fuel based on information reasonably available at this stage of project planning while reserving more detailed traffic impact studies for two proposed access points to Highway 17.

This approach supports a disciplined assessment effort which avoids duplication with other already existing Government of Canada legislation and regulatory processes. It correctly recognizes that the transportation of any radioactive materials in Canada must already meet the stringent requirements of the existing regulatory framework that is jointly managed by Transport Canada and the CNSC as outlined above.

Conclusion

Bruce Power supports the development of a deep geological repository as a foundational project for the Canadian nuclear sector which will provide a safe, long-term, and internationally-recognized solution for the management of used nuclear fuel in Canada. Bruce Power also supports a disciplined and proportionate impact assessment that aligns and recognizes where existing federal regulatory oversight already exists, particularly with respect to the transportation of used nuclear fuel.

Bruce Power appreciates the opportunity to comment on this important matter.

Sincerely,

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