Comment Number	Reference	Issue / Concern	Recommendation or Request for Clarification
1	Considerations Raised by Eagle Lake First Nation During Meeting with IAAC on April 28, 2026.	It is our understanding that baseline studies have already been conducted but have not been made available for review. Eagle Lake First Nation (ELFN) has requested that all baseline studies conducted to date for the project be made available. This is needed for ELFN to review and verify assumptions made in the IPD and TISG. In addition, it has come to our attention that baseline studies are currently being completed in collaboration with Wabigoon Lake Ojibway Nation (WLON). It is unclear what these studies include and if the information will be shared. ELFN emphasizes the importance of transparency on this issue and requests clarification on whether IAAC has been involved in this work. How will these studies inform the TISG and the broader impact assessment process? ELFN is concerned that the proponent is engaging a WLON-affiliated company to undertake baseline studies, which raises potential issues related to study ownership, methodological transparency, and access to results. ELFN is concerned that these factors may limit our ability to independently review, validate, and provide informed comments on the baseline information. We believe that full transparency in study design, methods, and findings is imperative.	Please provide all baseline studies completed to date for the project, as well as workplans for future studies. Please clarify the role of WLON, and any affiliated company, regarding the studies, and how their input will impact the TISG and impact assessment process. Please clarify what process is in place to ensure other First Nations' perspectives will be considered alongside WLON. Detail how transparency in study design, methods and results will be maintained for all studies being conducted as part of the baseline assessment for the project. Six First Nations have been preliminarily identified in the Indigenous Engagement and Partnership Plan as having a medium to high likelihood of potential impacts on rights. ELFN and WLON are both on that list, yet it seems WLON is being afforded enhanced consultation opportunities. Please explain why First Nations with comparable risks of adverse effects/impacts, which warrant a comparable level of consultation and accommodation under the DTCA, are not being given equal opportunity to participate in these regulatory processes.
2	Considerations Raised by Eagle Lake First Nation During Meeting with IAAC on April 28, 2026.	ELFN has requested that NWMO share workplans detailing field studies that are to be completed, including type of study, timeline and data gaps. It is unclear what baseline work is being planned, how ELFN will be involved, and if the work will address ELFN concerns around protection of valued components.	Please share all field study workplans prior to work beginning for review and input.

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3	Considerations Raised by Eagle Lake First Nation During Meeting with IAAC on April 28, 2026.	It is our understanding that WLON is undertaking their own Impact Assessment parallel to IAAC's process. It is important to note that WLON's IA framework may not reflect the interests, values, rights, or governance approaches of ELFN or other potentially affected First Nations. Individual First Nations may have their own resource laws and decision-making frameworks, including Grand Council Treaty 3's Great Earth Law. One Nation's framework or perspectives cannot be assumed to represent or account for all affected Nations.	ELFN requests that IAAC ensure that the TISG and assessment process recognize and accommodate the distinct rights, laws, and interests of all First Nations potentially impacted by the project.
4	Considerations Raised by Eagle Lake First Nation During Meeting with IAAC on April 28, 2026.	ELFN acknowledges IAAC's approach to coordinating with the province and the availability of a coordination plan outlining provincial permits and processes.	ELFN requests clarification on how provincial requirements and permits will be incorporated into the IA process.
5	Considerations Raised by Eagle Lake First Nation During Meeting with IAAC on April 28, 2026.	Please clarify the scope of the Transportation Plan and the Traffic Impact Study, specifically confirming the extent to which off-site transportation (including regional routes and associated infrastructure) is required to be assessed. Please provide details on evaluating transportation related effects, risks, and mitigation measures across local and regional scales within federal jurisdiction. Please clarify the difference between the geographic limits for assessing transportation related effects in the impact assessment and the study area required for the MTO traffic impact study, including how each should be defined and approved. Does the transportation study cover the full route from the point of departure (e.g., Ontario or other provinces) to arrival at the DGR?	Additional details on the scope of the Transportation Plan and Traffic Impact Study are requested. There is still uncertainty on how potential impacts from the transportation of used nuclear fuel will be assessed in the IA process, including how provincial and federal jurisdictions will work together.
6	Considerations Raised by Eagle Lake First Nation During Meeting with IAAC on April 28, 2026.	Can you clarify whether NWMO is required to demonstrate that all applicable provincial and municipal requirements have been satisfied? If so, how is this integrated into the overall assessment process? Compliance with these requirements should be established as part of the TISG.	Additional detail on how municipal and provincial requirements will be managed in the IA process is requested.

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7	Section 1. Introduction	... "the current versions of the guidance, referred to in this document, may not reflect IAAC's current practices."	These guidelines need to be updated and distributed as the TISG and other guidance documents are modified and updated.
8	Section 1. Introduction	The use of the terms "adverse effects" and "adverse federal effects" is confusing in the context of the larger assessment. "Adverse" has a negative connotation in assessments and effects can also be beneficial (e.g., socio-economic impacts).	The assessment should evaluate all physical, chemical and biological changes to the local and regional area due to the site preparation and, eventually, the operation and closure of the site. These guidelines focus on "adverse" impacts which can be defined as "something unfavorable, harmful, or acting in an opposing direction". Suggestion to address above concern is to include impacts whether positive, neutral, or adverse.
9	Section 1. Introduction	These guidelines are for the licensing of the preparation of the site and not for the operation, closure and post-closure phases.	The consideration of impacts from the preparation of the site should include the assessment of exposure and dose to Eagle Lake First Nation (ELFN) and local communities from naturally-occurring radionuclides (e.g., uranium isotopes and progeny, Ra-226, radon) that may be emitted from site operations in waste rock. This would require estimates of transfer pathways, and quantitative exposure estimates, probably using models for NORM (naturally occurring radioactive materials). The models could then be adapted to be used for man-made nuclides in later assessments. Recommendation is to require project-life considerations when it is clear licence approval will ultimately lead to certain activities.

Comment Number	Reference	Issue / Concern	Recommendation or Request for Clarification
10	Section 1. Introduction	"The IAA requires the assessment of non-negligible adverse effects...". If they are negligible, then there is no effect. The term is repetitive.	Please define "non-negligible adverse effects" and ensure consistent between terms as "significant" is also used interchangeably.
11	1.1 Scope of the impact assessment	"The scope of the impact assessment must consider each project phase over the lifecycle of the project, whereas this stage of the CNSC licensing process only covers the site preparation phase."	Models to conduct HHERA and estimate exposure to radionuclide emissions by First Nations and the general public, and radioactivity added to the environment from site preparation, will also be required at the later stages of the project. These models need to be published and technically reviewed as they relate to the DGR. It should be stated that, other than the general Guidance documents, it isn't clear what level of modelling of exposure and dose will be required by the CNSC for site preparation. The CSA and Health Canada publish deterministic models of exposure, with the public effective dose limit of 1 mSv/y, however it isn't clear if the constraint dose of 0.3 mSv/y or a screening dose of 0.1 mSv/y will be used for estimating risk due to the uncertainty of the time scale. Recommendation is to require project life considerations when it is clear licence approval will ultimately lead to certain activities.
12	1.2 Selection of Valued Components	site preparation: "preparation and construction, blasting, in-water works, water intake, dewatering, effluent discharge, deposition of deleterious substances, sensory disturbances could result in adverse effects to the biological environment."	Models are needed to assess the impacts of these activities on non-human species in regards to naturally-occurring radionuclides (NORM) during the site preparation stage. The same models will be used later (during operation of the site) for the emission of human-produced nuclides in the stored fuel.

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13	1.2 Selection of Valued Components	"Project-related activities could result in changes to land access and use for cultural purposes, increased perceptions of risk associated with radioactive waste, health and wellbeing through impacts to air and water quality, and the social and economic conditions of Indigenous Peoples."	Site preparation may affect land use and traditional hunting and fishing activities for ELFN, and other communities. Radiation in waste rock will be a concern during site preparation, but from natural nuclides in the disturbed bedrock, and later with other nuclides during vault operation, not just "increased perception". The data and methods used to predict exposure/dose and risk need to be explicitly described for technical review in the initial phases of the project. At this stage it isn't clear to what extent site operations and exposure models (e.g., derived release models) will be required by the CNSC for NWMO operations.
14	1.2 Selection of Valued Components	Project-related activities could result in changes to land access and use for cultural purposes, increased perceptions of risk associated with radioactive waste, health and wellbeing through impacts to air and water quality, and the social and economic conditions of Indigenous Peoples. The phrase "increased perception of risk associated with radioactive waste" is concerning. The term "perception" is dismissive and pejorative as the risk is real when a community has responsibility to, at a minimum, 7 generation or the future 250 years.	This should also include "changes in peaceful enjoyment of the lands". Recommendation is to amend the phrase to " increased potential risk and stigma associated with radioactive waste, health and wellbeing through impacts to air and water quality, and the social and economic conditions of Indigenous Peoples."

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15	Section 1.2 Selection of Valued Components and 1.3 Preparing the Impact Statement	The proponent may select additional VCs, based on engagement with Indigenous Nations and communities and public participants and in consideration of Indigenous Knowledge and community knowledge. The Impact Statement must provide a justification if a VC suggested by an Indigenous Nation or community is excluded from the Impact Statement. (L134-137). As applicable, the proponent is also encouraged to refer to the requirements of other jurisdictions to assess effects, as well as to means of other jurisdictions to address effects of the project and to report in the Impact Statement how these were leveraged to assess effect. (L162-164)	Significant Wildlife Habitat (SWH) identified under provincial policy can provide a useful framework for identifying valued components of concern to Indigenous nations and communities. The IPD describes some SWH types as confirmed or candidate in the study area. We recommend that SWH types that are of Indigenous concern be included as valued components in the Impact Statement. Change the statement "must provide a justification" to "must provide a lawful justification."
16	1.3 Preparing the Impact Statement	"The proponent is encouraged..."	These guidelines only apply to the site preparation stage. It is important to recognize the uncertainty involved with estimating conditions over the operating life of the project, as well as the post closure stage. No project has been monitored over this timeframe. Recommendation is to require project life considerations when it is clear licence approval will ultimately lead to certain activities.
17	2.1 Project overview	"The project subject to the impact assessment is the designated physical activity (i.e., the construction and operation of a new facility for the long-term management or disposal of irradiated nuclear fuel or nuclear waste) and any incidental physical activities." This, and the following text, suggests that the full project and complete operating life span will be assessed in the Impact Statement. This is counter to earlier text that this EIS is for licensing for site preparation.	Please clarify. Appendix A outlines the regulatory environment for site preparation, but also discusses the need for a Post-closure safety case. Are these guidance documents outlining the requirements for an EIS for licencing of the Revell site preparation? Or for a larger, more comprehensive assessment of the project?

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18	2.2 Project components and activities	"in addition to those listed in the Initial Project Description, transportation of both nuclear and non-nuclear materials outside of the project site, including the construction activities associated with infrastructure upgrades, must be included within the list of project components." How are other First Nations who are hosts to nuclear stations and generators being integrated? There is an interesting interplay between the First Nations who will live with the burden of the waste and those who have supported its generation and may or may not support its transportation from its territory to another Nation's territory.	The risks from increased truck traffic on Hgwy 17 and the transportation of 5 million+ used fuel pellets should now be included in the risk to the public in the region and local study areas. It should be emphasized that this has changed from the IPD where it was suggested that transportation conformed to Transport Canada regulations. Recommendation is to ensure all First Nations along potential transport routes have a process to communicate and discuss concerns or areas of agreement.
19	2.2 Project components and activities	"identify activities that involve periods of increased disturbance to adverse federal effects and impacts on Indigenous Nations and communities and their rights"	Clarify term: "increased disturbance to adverse federal effects"
20	4. Assessment Methodology	Section 4 notes that potential impacts to applicable valued components could include accidents and malfunctions (Section 9). Petroleum spills from accidents, or vehicle malfunctions are possible during the construction and operations phase of the project. In addition, spills of nuclear waste prior to placement in the DGR (i.e., during transport and temporary laydown, if applicable) also present a key pathway for radionuclides to reach the environment and impact valued components. To ensure these risks are properly assessed, it should be clarified whether the development of a spill management plan will be required at this stage of the project.	Please clarify whether a spill management plan will be required as part of the Impact Assessment. A spill management plan should describe immediate containment and cleanup measures, communication and reporting protocols, and preventative/mitigative measures to prevent spills (e.g., design features and operational practices to minimize potential for radionuclide release)

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21	4. Assessment Methodology	Section 4 notes that the Impact Statement must assess potential impacts of project-related transportation activities, including the associated construction of infrastructure, that will occur. This should explicitly highlight the potential impacts of laydown activities and any temporary holding/storage of nuclear waste, prior to its deposit in the DGR. This is a key pathway for radionuclides to enter the environment, and NWMO should thoroughly describe and assess how any temporary holding of radioactive materials will be managed, to prevent impacts to human and ecological health. Further, the ways in which human and ecological health impacts from radioactive materials transportation will be mitigated, should be explicitly described in a transportation management plan, also including a description of the nuclear waste source site, how dust and noise will be controlled, how nuclear waste will be tracked, any sampling protocols required for waste acceptance, temporary laydown locations, record keeping, and contingency measures.	Section 4 of the TISG should be revised to require that the Impact Statement specify potential impacts of laydown activities, as well as temporary holding/storage of nuclear waste. Specific details of the infrastructure should be provided in the Impact Statement (e.g., locations, design features, duration, types and quantities of nuclear waste and how each type of waste will be managed), and a comprehensive assessment of potential impacts associated with temporary storage and laydown should be provided, including potential effects on human health, ecological receptors, and valued components. Additionally, a transportation management plan should be provided in the Impact Statement, describing waste source sites, transport routes, dust/noise/emissions controls during transport and handling, waste acceptance protocols/criteria, recording requirements, temporary laydown/holding locations, and contingency and emergency response measures.
22	4.1 Leveraging Existing Information	"IAAC recognizes the work carried out to date, including the collection of baseline information and the early identification of mitigation measures and project design features intended to avoid or reduce potential adverse effects. The proponent is encouraged to leverage this information and these early mitigation measures in preparing the Impact Statement, where appropriate, to support a focused assessment on key issues".	A comprehensive list of all project baseline studies conducted to date, as well as access to these reports, must be provided. This should include studies conducted early on in the site selection process. It is unclear, at this point, what studies have been done.

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23	4.1 Leveraging Existing Information	"demonstrate that the existing baseline information meets the requirements outlined in the applicable sections of the Integrated Guidelines and/or reference documents" Strong baseline data (e.g., with high statistical power) is necessary for quantitative data, given the long time frame and high uncertainty of human and environmental conditions over the life of the project. High statistical standards are required to detect changes in conditions, such as radionuclide concentrations well into the future.	NWMO should provide performance standards (sample sizes, sample frequency, detection limits, QA/QC, etc.) for all baseline data for COPCs and radionuclides in the EIS. These standards must be stringent to be useful in the next century or two.
24	5.2.1 Baseline conditions (Geology)	"the results of the geochemical characterization study that evaluated the potential for acid rock drainage, neutral mine drainage, and/or metal(loid) leaching for all materials,..." These data are an important component in the estimation of potentially elevated dose to ELFN and the public and the environment from waste rock, dust emissions, radon exposure, etc. The geochemical analysis of the rock needs to be consistent with the dose/exposure and risk estimates as part of the HHERA.	The report text should emphasize the importance of the geochemical analysis in terms of evaluating risk to humans and the environment. Uranium, NORM and COPCs need to be reported for estimating potential exposure to humans and the environment in initial phases.

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25	5.2.1 Baseline Conditions (Geology)	The TISG states that the Impact Statement must describe the geology of the project area, including petrology, mineralogy, geochemistry, hydrogeochemistry, stratigraphy, structural geology and tectonic setting. To ensure that a sufficient level of detail is included for an adequate effects assessment (section 5.2.2.), the TISG should include explicit and detailed requirements for these studies (particularly regarding faults/geological structures).	The Impact Assessment should be required to include site plans/figures of the project area that identify the geology/mineralized zones, fault traces and fractures (and all other structural features) in and around the project area, and the spatial relationship of these features to the proposed DGR footprint and depth. Specific details on the orientation, strike and dip of structures, evidence supporting the interpreted geometry, and an explicit demonstration (supported by geological/borehole data) that no identified faults/fractures will intercept the DGR depth, or pose a risk of creating a preferential groundwater pathway to/from the repository. While this is touched on in section 5.6.1, additional emphasis on the need for sufficient evaluation of faults/fractures should be included in the TISG.
26	5.2.1 Baseline Conditions (Geology)	The TISG states that the Impact Statement must "provide a systematic geochemical characterization of excavated materials and its weathering process in the stockpile or disposal facility, as well as the wall of underground openings," and must "provide a detailed summary of analytical methods used to characterize mineralogy, petrology, elemental composition, acid generating potential and CoPCs leaching" (P. 15). The TISG also states that representativeness of samples collected for acid rock drainage and COPC leaching assessment be described, and that short-term and long-term leach test results be included. The TISG should also explicitly require that the Impact Statement calculate and consider the neutralization potential of all waste rock/excavated materials that could be sources of acid rock drainage, and explicitly discuss whether neutralization potential of rock could be used up, causing late-onset acid generation/metal leaching.	The geochemical characterization requirements (as part of baseline conditions) in the TISG should also specifically emphasize calculation and evaluation of neutralization potential of all waste rock/excavated materials that could be sources of acid rock drainage, and explicitly discuss whether neutralization potential could be used up, causing late-onset acid generation/metal leaching.

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27	5.3.1 Baseline Conditions (Soil and Sediment)	The TISG states that the Impact Statement must "describe the terrain, soils, and sediments within the local and regional study areas..." (P. 27, line 525). To ensure that the Impact Statement provides sufficient detail, the TISG should include explicit requirements regarding the level of detail expected in these descriptions of terrain, soil and sediments. Further, while the TISG does require that any known/suspected soil and sediment contamination be described, it does not provide specific details on what should be included in this description.	The TISG should be revised to require that the Impact Statement provide physical descriptions of the soils and sediments, including soil and sediment types, textures/structures, site plans/figures that clearly show all soil and sediment sampling locations within the project area, sample depths and rationale for sampling locations, baseline soil/sediment chemistry (including characterization of background concentrations of CoPCs, and discussion of spatial variability and representativeness of samples). Further, depths, extents and estimated volumes of any contaminated soil/sediment, as well as identification and concentration of CoPCs present, supported by evidence from field investigations/analytical data, and historical data, should be included. The TISG should also require that the Impact Assessment describe how project activities may disturb/mobilize any contaminated soil or sediment.
28	5.3.1 Baseline Conditions (Soil and Sediment)	"...suspected soil or sediment contamination..."	Sites of soil contamination need to include mineral licks ("deer licks") that indicate sites of groundwater discharge where wildlife may be exposed to COPCs in emerging groundwater.

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29	5.4.1 Ambient radioactivity	Ambient Radioactivity	Change "describe" to "Report on" ambient radiological conditions as outlined in Health Canada's Guidance for Evaluating Human Health Impacts in Impact Assessments: Radiological Impacts and Country Foods reports. There are several reports as well on estimating ambient radiation exposure in non-human species. Rigorous analysis of background radiological conditions will be used in the future to estimate changes in exposure/dose/risk to humans and non-human species.
30	5.4.2 Changes to radiological conditions	Releases of radioactivity from construction and operations.	The EIS must be explicit in providing information on radionuclide releases, including the nuclides involved and pathways of releases, for all phases of the project. Again, this is counter to the original intent of these guidelines which were provided for licencing of the site preparation.
31	5.6.1 Baseline conditions (Groundwater and Surface Water)	This is a critical part of the hydrology question and needs to be emphasized. Groundwater is expected to infiltrate the vault at some point, and may lead to the transport of nuclides to the surface although it may occur hundreds of years in the future.	The need for comprehensive groundwater and surface water transport must be explicitly emphasized, and predictions provided for future hydrology under changes in climate and biosphere. This will affect the transport of COPCs and radionuclides from the surface operations and the vault in the future and impact exposure/dose/risk to receptor populations on the surface.

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32	5.6.1 Baseline Conditions (Groundwater and Surface Water)	The TISG requires that the Impact Statement "provide a characterization of groundwater resources potentially affected by the project" (P. 22, line 683). While the TISG requires that the hydraulic properties of hydrostratigraphic units be described (see P. 24, line 771), the TISG should emphasize the need for methodology (e.g., testing methods) to be provided as evidence to support interpretations.	The TISG should be revised to explicitly require descriptions of all methods and data used to determine hydrogeological characteristics of all aquifers/hydrostratigraphic units - for example, test methods (e.g., pumping tests), as well as evaluations of vertical and horizontal hydraulic gradients in different hydrostratigraphic units, seasonal variability, deep and shallow groundwater quality, and emphasis on documenting all field investigations relied upon for interpretations/conclusions (e.g., locations of wells, boreholes, depths and screened intervals, well install details, testing methods/durations, and QA/QC procedures).
33	5.6.1 Baseline Conditions (Groundwater amd Surface Water)	The TISG requires that the local groundwater monitoring program be described.	It is recommended for ELFN to be part of the local groundwater monitoring program, with ELFN's own monitors, to ensure that groundwater resources of cultural/traditional significance or any groundwater resources sourced as drinking water are scoped into the local program, and to promote engagement/community involvement in the program.
34	5.6.2 Effects to groundwater and surface water	An agreement reached during the Initial Project Description review to undertake a cumulative effects assessment of water withdrawals and effluent discharges should be included in the TISG.	As per the commenting period for the IPD, NWMO stated that they would complete an assessment of the combined effects of water withdrawals and effluent discharges to the same receiving environment, where applicable. The Impact Assessment should consider interacting pathways between withdrawals and discharges, including combined effects on flow regime, water quality, assimilative capacity, and fish and fish habitat. This should be incorporated into the TISG.

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35	5.6.1 Baseline Conditions (groundwater and surface water) and 6.2.1 Baseline Conditions (fish and fish habitat)	(5.6.1) - identify and describe the waterbodies and water resources potentially affected by the project (6.2.1) - list in a table all waterbodies and watercourses frequented by fish, or on which fish depend directly or indirectly, likely to be affected by the project.	Please ensure that any unmapped features identified through aerial photo interpretation and/or field investigations are included.
36	5.6.1 Baseline Conditions (groundwater and surface water)	"• provide a list of all waterbodies and watercourses (permanent, intermittent and ephemeral) that may be directly or indirectly affected by the project. Provide a table that groups waterbodies and watercourses by sub-watershed and provides the following information about each..."	In addition to the requested information, please include the upstream watershed size for each listed waterbody and watercourse, for example as derived from the Ontario Watershed Information Tool (OWIT). Including upstream watershed size provides context for hydrologic sensitivity, assimilative capacity, and cumulative effects on waterbodies and associated fish and fish habitat.
37	5.6.2 Effects to groundwater and surface water	An agreement reached during the Initial Project Description review was to undertake an assimilative capacity study of the receiving waterbodies that will receive effluent discharges should be included in the TISG.	During the review of the Initial Project Description, it was agreed that an assimilative capacity study would be completed as part of the Impact Statement. This study should be explicitly required in the TISG and must assess treated effluent discharges in relation to the assimilative capacity of the designated receiving environment, in accordance with Ontario MECP Policy B-1-5. The study should also confirm that projected discharges will comply with applicable municipal, provincial, and federal regulatory requirements, including discharge criteria established in consultation with the MECP through the provincial permitting process, and should consider combined effects where multiple withdrawals and/or discharges occur to the same receiving environment.

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38	6.1.1 Baseline conditions	"species for which harvest level records are maintained..."	It should be emphasized that these data are required to ensure that harvested species do not decline in such a way to impede traditional uses of the species by ELFN, particularly in the event of large numbers of new workers in the area. The harvesting rights of First Nations need to be supported by providing accurate data on numbers harvested and species status. This applies to terrestrial, bird and aquatic species.
39	6.2.1 Baseline Conditions (fish and fish habitat)	"for each of the waterbodies and watercourses listed above, present maps at appropriate scales using aerial imagery overlaid with relevant descriptions, as well as relevant summary tables, that depict: -flow direction, if applicable"	Please include an assessment of hydrologic and ecological connectivity to downstream features, including the potential for project-related effects to be transmitted to downstream waterbodies and associated fish and fish habitat.
40	6.2.1 Baseline Conditions (fish and fish habitat)	"physical and biological characteristics at a level of detail commensurate with the potential for effects on fish and fish habitat including: -important habitat features (e.g., substrate types, beaver dams, riffles, pools)".	Aquatic plant species should be identified if not already completed, in order to support the identification of fish and aquatic plant species that will serve as the focus of the effects assessment.
41	6.2.1 Baseline Conditions (fish and fish habitat)	The Impact Statement must: list in a table all waterbodies and watercourses frequented by fish, or on which fish depend directly or indirectly, likely to be affected by the project. Include in the table whether freshwater, estuarine or marine, type and permanence (e.g., temporary, intermittent or ephemeral stream), size (i.e., width at the ordinary high-water mark) and depths, ice regime, and whether flows are regulated;	Please ensure that the thermal regime is identified and described for all listed waterbodies and watercourses, as it is a key characteristic influencing fish presence, habitat suitability, and sensitivity to project-related effects.

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42	6.2.2 Effects to Fish and Fish Habitat	"describe residual, and, if applicable, cumulative effects to fish and fish habitat and aquatic plant species based on the likely effect pathways and a comparison with baseline conditions".	To support the effects assessment, baseline information on benthic invertebrate communities and other key aquatic food-web components should be included, as these are integral to the aquatic ecosystem, primary food source for fish, and may respond differently to project-related stressors than fish.
43	6.2.2 Effects to Fish and Fish Habitat	"describe residual, and, if applicable, cumulative effects to fish and fish habitat and aquatic plant species based on the likely effect pathways and a comparison with baseline conditions".	Baseline environmental reports have not yet been provided for review. NWMO should provide a detailed field work plan for review, outlining any proposed additional field investigations, including their scope, methods, and timing.
44	Section 6 Biological Environment, 6.1 Terrestrial, riparian and wetland environments, 6.1.1 Baseline conditions	The list of Impact Statement requirements to characterize baseline conditions does not include the requirement for maps showing the project's footprint relative to each type of environment (i.e., terrestrial, riparian, wetland) and description of whether project components avoid sensitive habitats (such as wetlands).	Please require that the proponent provide maps of the project's footprint relative to information on each type of environment, identifying temporary and permanent infrastructure, and including a description of whether project components avoid sensitive habitats.
45	Section 6 Biological Environment, 6.1 Terrestrial, riparian and wetland environments, 6.1.1 Baseline conditions	The list of Impact Statement requirements to characterize baseline conditions does not include the requirement for maps showing habitat survey locations (including details of spatial and temporal coverage).	Please require that the proponent map habitat survey locations and discuss spatial and temporal coverage.

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46	Section 6 Biological Environment, 6.1 Terrestrial, riparian and wetland environments, 6.1.1 Baseline conditions	The list of Impact Statement requirements to characterize baseline conditions does not include requirements to evaluate whether field habitat surveys are sufficient to support the assessment of likely residual and cumulative effects on terrestrial, riparian and wetland environments, and to determine if these effects are significant given uncertainties and bias, and spatial and temporal representation, in the baseline data.	Please require that the proponent justify whether existing information and recent field habitat surveys are sufficient to support the assessment of likely residual and cumulative effects on terrestrial, riparian and wetland environments, and to determine which of these effects are significant, considering uncertainties and bias, as well as spatial and temporal representation, in the baseline. If the information is deemed insufficient, the proponent should be required to conduct additional surveys to fill the information gaps to inform the Impact Statement.
47	Section 6 Biological Environment, 6.3 Birds and their habitat, 6.3.2 Effects to birds and their habitat	The list of Impact Statement requirements to determine effects to birds and their habitat is missing important considerations listed for other biological components.	Please require that the proponent describe potential effects of the project on birds and their habitat due to the following, as applicable: site preparation, vegetation removal, particularly habitats important for breeding, migration, overwintering, foraging, or that act as movement corridors, noise, light and sensory disturbances, water and air emissions or dust, bioaccumulation of contaminants, habitat loss and fragmentation, introduction of invasive species, altered predator-prey relations, increase in the spread and prevalence of diseases and other health concerns.

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48	Section 6 Biological Environment, 6.3 Birds and their habitat, 6.3.2 Effects to birds and their habitat	The list of Impact Statement requirements to determine effects to birds and their habitat is missing important considerations listed for other biological components.	Please require that the proponent describe and quantify where possible potential effects to birds, including acute and chronic effects to bird health, of changes to air and water quality (e.g., from radiation exposure, contaminants, effluents, atmospheric emissions, dust deposition, and bioaccumulation).
49	Section 6 Biological Environment, 6.3 Birds and their habitat, 6.3.2 Effects to birds and their habitat	The list of Impact Statement requirements to determine effects to birds and their habitat is missing important considerations listed for other biological components.	Please require that the proponent describe and assess the resilience and recovery capabilities of birds and their habitats to disturbance, including the anticipated potential for the project area to be returned to its existing state for bird populations and their habitat following operations.
50	Section 6 Biological Environment, 6.4 Terrestrial wildlife and their habitat, 6.4.1 Baseline conditions	The list of Impact Statement requirements to characterize baseline conditions does not include the requirement for maps showing the project's footprint relative to terrestrial wildlife and their habitat, identifying temporary and permanent infrastructure, and describing whether project components avoid sensitive habitats, such as areas of seasonal concentration, travel corridors and alternate travel corridors.	Please require that the proponent provide maps of the project's footprint relative to information on wildlife and their habitat, identifying temporary and permanent infrastructure, and including a description of whether project components avoid sensitive habitats, such as areas of seasonal concentrations and travel corridors and alternate travel corridors.
51	Section 6 Biological Environment, 6.4 Terrestrial wildlife and their habitat, 6.4.1 Baseline conditions	The list of Impact Statement requirements to characterize baseline conditions does not include the requirement for maps showing survey locations for wildlife and their habitat (including details of spatial and temporal coverage).	Please require that the proponent map survey locations for work done to characterize wildlife and their habitat, and discuss spatial and temporal coverage.

Comment Number	Reference	Issue / Concern	Recommendation or Request for Clarification
53	Section 6 Biological Environment, 6.4 Terrestrial wildlife and their habitat, 6.4.1 Baseline conditions	The list of Impact Statement requirements to characterize baseline conditions does not include requirements to evaluate whether information and field habitat surveys are sufficient to support the assessment of likely residual and cumulative effects on terrestrial wildlife and their habitat, and to determine if these effects are significant given uncertainties and bias, and spatial and temporal representation, in the baseline data.	Please require that the proponent justify whether existing information and recent field habitat surveys are sufficient to support the assessment of likely residual and cumulative effects on terrestrial wildlife and their habitat, and to determine which of these effects are significant, considering uncertainties and bias, as well as spatial and temporal representation, in the baseline. If the information is deemed insufficient, the proponent should be required to conduct additional surveys to fill the information gaps to inform the Impact Statement.
54	Section 6 Biological Environment, 6.5 Species at risk and their habitat, 6.5.2 Effects to species at risk and their habitat	The proponent is required to "describe the area, biophysical attributes and location of habitat including critical habitat affected...including direct and indirect effects due to vibration and artificial light in the project area on usage patterns and migratory behaviour of species at risk" (L1243-1245). The description should not be limited to the effects of only vibration and artificial light, but also to the effects of factors such as habitat loss, fragmentation, and degradation; water, air and noise pollution; increased traffic; and increased risk of predation.	Please require that the proponent describe the direct and indirect effects of habitat loss, fragmentation, and degradation; water, air, and noise pollution; increased traffic, and increased risk of predation on species at risk and their habitat.
55	7. Human Environment	"The proponent should work with, at minimum, the Township of Ignace, City of Dryden, Municipality of Sioux Lookout, Municipality of Machin, Village of Wabigoon Local Services Board, Melgund Local Services Board, City of Kenora, Municipality of Red Lake, Township of Ear Falls, Township of Pickle Lake, Township of Sioux Narrows-Nestor Falls, and other self-identifying local communities, as well as local peoples, when fulfilling the requirements of Section 7. The proponent must consider the Indigenous Nations and communities when fulfilling the requirements in Section 7 and Section 8.3.2."	The guidelines outline the need for discussions with communities some distance from the Revell site (e.g., Kenora, Red Lake) but is less clear about seeking input from First Nations in the same area. The status of each First Nation and their input to the IS needs to be sought and recorded to the same extent as that of the communities.

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56	7. Human Environment	"...including non-negligible adverse changes occurring in Canada to the health, social or economic conditions of Indigenous Peoples".	It is assumed that baseline data will be collected for First Nations to the degree that accurate, robust, and quantitative empirical data will be available to estimate background radiation exposure in humans and non-human species, and to predict changes in exposure and dose from NWMO operations. The data will be used to predict the effects of the operations and emissions to the environment from site preparation to the eventual operations, closure and post-closure. This includes the features outlined in Section 7.2 on land uses, hunting/trapping areas, permanent and temporary residences (e.g., cabins, camps) and sensitive receptors. These data are critical for estimating exposure/dose from emissions of COPCs and radionuclides to First Nations.
57	8. Indigenous Nations and Communities	"Wabigoon Lake Ojibway Nation have shared that they will be implementing their own independent Regulatory Assessment and Approval Process (RAAP) for the project, grounded in Anishinaabe law, values, and responsibilities. In consideration of the RAAP, the proponent is expected to collaborate with Wabigoon Lake Ojibway Nation, where appropriate, in fulfilling the requirements of the Integrated Guidelines as they relate to Wabigoon Lake Ojibway Nation".	It is unclear how 'Manito Aki Inakonigaawin', the Great Earth Law, and Eagle Lake First Nation's 'Migisi Sahgaigan Maanachi Totaa-aki Declaration' will be meaningfully addressed in the IA, given the TISG are focused on WLON's RAAP. The concern is if one Treaty 3 Nation is being considered the authority on the Treaty 3 lands, ways of knowing, and laws. Recommendation is to include a process for other Treaty 3 First Nations to review and comment on WLON's RAAP and ensure the voice of all proximate Nations are represented by allowing them to provide comments on both the IA and the RAAP.

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58	8.2.2 Effects to current use of lands and resources for traditional purposes	This section reinforces the need to understand land uses, traditional practices and the effect of the Revell site on wildlife and fish, and all data that can be used to estimate and understand the exposure and risk estimates from COPCs and radionuclides from NWMO operations. From Guidance: country foods "Among other things, the IAA includes specific requirements to consider positive and negative effects on the health, social and economic conditions of the public, including Indigenous peoples. In addition, the IAA includes the requirement for potentially affected Indigenous groups to be consulted during the planning phase of the project and incorporate Indigenous traditional knowledge, if provided, alongside other evidence."	This section explicitly repeats the importance of accurate, reliable data for First Nations to allow some predictions for potential exposure to COPCs and radionuclides. The Health Canada guidance documents do a reasonable job of addressing the needs of the IS and subsequent assessment, and how to address data ownership with the individual First Nations.
59	Page 11 Footnote	"It is ultimately the responsibility of the Crown, not proponents, to aim to secure FPIC where appropriate for Crown decisions."	It is unclear how FPIC is defined and sought. We would like clarity between the roles of the IAAC and the CNSC regarding who holds the duty to consult and FPIC requirement. We recommend clear direction on each parties' role – NWMO, IAAC, and CNSC well as clear understanding of the process to ensure FPIC and DTCA are properly undertaken.