

Comments on *New Nuclear at Wesleyville Project* in Port Hope (89802)  
Summary Initial Project Description

To The Impact Assessment Agency Canada

By The Ecological Justice Working Group of the Justice, Mission and Outreach  
Committee, Regions East, United Church of Canada

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Thank you for the opportunity to comment on the Initial Project Description of reference number 89802, *New Nuclear at Wesleyville Project*, in Port Hope. It is perturbing that yet another nuclear project is proposed for this area and its communities that have suffered since the 1940's from impacts of radioactive emissions and nuclear wastes. The matter of environmental injustice is relevant to this Project.

The United Church of Canada has a long history of policies, documents, and submissions to public calls for input on social, environmental and ethical issues relating to energy issues and climate change. This submission is grounded in that extensive base of information including the foundational policy, *Energy in the One Earth Community- Current Challenges and Future Options for Energy Use in Canadian and Global Contexts* (2000)<sup>1</sup>. Excerpts from ethical reflections within United Church Policies on major energy issues in Canada are given in Appendix 1.

The United Church has acknowledged the harmful role that past false assumptions of human separation from and superiority over the natural world has had in the commodification of nature and environmental destruction. In its policies supporting this submission, the United Church has clearly articulated humanity's fundamental integration with the rest of creation along with a call towards responsibility for the care of creation. Further, the United Church notes that such crucial understandings are at the

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<sup>1</sup>United Church of Canada. Social Policy. *Energy in the One Earth Community*. August 29, 2000.  
<https://generalcouncil.ca/document/energy-one-earth-community>

root of the richness and wisdom of Indigenous worldviews and draws your attention to the importance of that wisdom in this assessment process.

## Initial Project Description

### Regional and Strategic Assessments

The Report of the Federal Environmental Assessment Panel on the Port Granby Project in 1978 is relevant, with information, recommendations and the rationale for their decision that give an important context and awareness of ongoing concerns.<sup>2</sup>

The dismissive tone of OPG on health issues in the New Nuclear Wesleyville Project brought this 1978 Assessment to mind. Also, a note that localized exposure health results are often diluted by expanding the scope in the assessment to areas beyond the main impact points.

### Project Design

There is no project design for the New Nuclear Wesleyville Project in Port Hope Municipality beyond

- the site map,
- anticipation of a nuclear generating station with multiple independent new nuclear reactors capable of generating up to a total of approximately 10,000 MWe,
- expectation of a new facility for the storage and management of used nuclear fuel or nuclear waste

OPG notes that there is consideration of "alternatives for the on-site storage of irradiated fuel, which would require additional consideration within the overall IA process."

The Project Design Under the Physical Activities Regulations clearly indicates that this Project is required to submit an Initial Project Description and as this Project is considered a designated project it " could require an IA."

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<sup>2</sup>Federal Environmental Assessment and Review Process  
[https://publications.gc.ca/collections/collection\\_2017/eccc/En21-25-1978-eng.pdf](https://publications.gc.ca/collections/collection_2017/eccc/En21-25-1978-eng.pdf)

Indeed, the New Nuclear Wesleyville must have a full impact assessment with a Panel Hearing for verbal presentations.

The section, Alternative Means of Carrying out the Project provides some Indication of types of design options.

Alternative designs that are listed are just suggestive but indicate the different considerations that must be considered in an assessment that are specific to the actual design choice, which this project is without.

With respect to the reactors listed, both Pressurized Water Reactors listed, required enriched uranium and the EDF's Evolutionary Pressurized Reactor can also use MOX fuel. These fuel requirements raise additional concerns of fuel import, intention to fabric enriched fuel in Canada, or in the case of MOX fuel, intention to reprocess fuel to extract plutonium. These considerations are not part of the CANDU Monarch, however, there has been no operational Monark at this scale so there is no data for many of the aspects normally presented. The site would need 10 Monarch reactors to obtain the intended 10,000 MWe. The inclusion of GE-Hitachi's BWRX-300, a mere 300 MWe reactor, is not explained.

Similarly, several suggestive lists are given for other essential systems, each with different considerations for assessment.

While it is stated "Technically and economically feasible alternative means of carrying out the NNW Project will be evaluated through the IA process, including the assessment of best available technologies" and that this will be done through a "Planned Assessment Approach," the overall indication is that of a project being brought into the assessment progress too early, with insufficient planning.

### **Project Purpose and Need; Alternatives to the Project**

The Proponent has stated, "In the case of a nuclear energy project, an assessment of energy mandates established through federal and provincial legislation or policy may not be within the scope of the IA (Impact

Assessment Agency of Canada, 2025). No alternatives to the project are being considered.”

Indeed, the project purpose and need can be met by Alternatives. Neither directives to explore opportunities for new nuclear generation nor an acknowledgement of a potential development removes the requirement that the Need and thereby, the alternatives must be explored.

“Need” is an important component of impact assessments, required under Section 22 of the impact assessment and the principle underpinning this requirement is that unless there is a demonstrable public need for a risky undertaking, it should not be allowed to proceed, and those impacts should be avoided.

Costs and end-of-life risks are also factors not included in such ventures to date but must be included now, in this Project, as Canada addresses the first decommissioning of a nuclear reactor at Gentilly-1 and the first assessment of site-specific Deep Geological Repository near Ignace

This large nuclear power station Project with multiple reactors of undetermined design, potentially with no operational on-grid data, is a risky undertaking. This risky undertaking can and should be avoided by using alternate energy options with lower risk and lower costs.

Industry and subsequently governments promote nuclear energy as a positive contribution to climate action, however, uranium ore like fossil fuels feeds a power system that overall contributes to climate change.

While the nuclear plant itself has relatively low CO<sub>2</sub> emissions, the nuclear chain, in which the nuclear power plant is one link, is a significant producer of greenhouse gas emissions (GHG) from uranium mining, milling, fuel fabrication, decommissioning, transport of intermediate and high level nuclear wastes to long-term repositories, as well as other GHG producers along the nuclear power chain.

More significantly, nuclear power’s other emissions of radioactive particles (alpha and beta) and radiation (gamma) to air, land and water are documented at all points from the nuclear power chain including at nuclear

power plants. Also, nuclear power produces toxic radioactive liquid and solid wastes, including the highly radioactive toxic nuclear fuel wastes, with ties to military applications and security risks.

Any relative reduction in GHG from the nuclear power chain over fossil fuels is irrelevant because of the far worse consequences from the nuclear power chain of radiological toxic releases; ties to military applications, sacrifice zones and the inherent hazards from nuclear fuel waste beyond millions of years.

Carbon dioxide is a necessary chemical in global cycles of life and planetary function and with concentrations allowed to move into normal range, these necessary functions will be met.

Nuclear power is too expensive, too slow to come on-board, fraught with radioactive toxic waste issues throughout the nuclear chain from uranium mining to used nuclear fuel waste, and as a baseload, increasingly uncompetitive with diversified renewable energies paired with storage options for the modern flexible grid.

The proponent is dismissive of alternatives, failing to address a critical set of considerations which OPG must be required to do.

## APPENDIX 1

Excerpts from ethical reflections within United Church Policies on major energy issues in Canada:

The full development and use of energy must be considered in assessing various options. Life-cycle analyses are useful in that they force us to broaden our perspective beyond the immediate use of energy and consider the long-term and long-range impacts.

As Canadians, we cannot concern ourselves with just the immediate and domestic consequences of our energy choices, but must recognize and take responsibility for the impacts on the Earth as a whole, both currently and in the future.

Environmental and social assessment processes, as well as the accumulating scientific evidence, point to massive destructive impacts from many of the energy sources currently in use. We must accept our responsibility and shift energy policies and approaches so that we use less energy and draw it from sources which are less polluting and less environmentally destructive than the current ones, particularly nuclear power and sources dependent on fossil fuels.

Technologies already exist which are much more energy efficient, and many more could be brought on stream quickly if the research and development resources were applied. These technologies could dramatically reduce the amount of energy that we use per unit of production, consumption, and transportation.

Future generations are not represented in our legislatures, boardrooms, or international negotiations to argue their own case. The consequences of the energy patterns of current human societies represent the most serious environmental threats to the health and well-being of future generations, specifically, fossil fuel use and nuclear power.

To care for creation is to assume responsibility for speaking on behalf of future generations of human and non-human species as energy decisions are made which could positively or negatively affect their capacity to live full and healthy lives. Protecting the Earth's biodiversity requires us to utilize energy

judiciously so as to avoid waste and inefficiency and to shift toward energy sources which carry fewer inherent destructive impacts.

Renewable energy technologies offer the most encouraging potential for energy sources which carry modest enough environmental impacts that they can be used without exceeding the carrying capacity of the Earth. Energy conservation, efficiency, and renewable sources can reflect the precautionary principle of avoidance of ecological damage.

Environmental protection can be added to the many other good reasons for pursuing non-violent approaches to conflict resolution. War, military maneuvers, and the production of military equipment utilize vast quantities of energy. Environmental impacts are among the less analyzed consequences of war. Oil refineries, nuclear power facilities and energy systems are targets for bombing, causing severe pollution of land, air, and water sources.

Nuclear power generation and nuclear bomb production are inter-related through common use of uranium, the potential for high-level nuclear wastes to be diverted for bombs, and there is no known safe method of disposing of (isolating) the high-level wastes.

People impacted by large projects should have the opportunity for full and meaningful participation in decision-making regarding such projects, especially since the energy benefits are likely to be reaped by industry and urban dwellers far away. Participation is often difficult for community groups with limited resources. It is important for governments to provide adequate intervener assistance for those most affected by the projects and to use an open and transparent decision-making process.

A comprehensive background on the United Church ethical position, involvement, and key United Church documents relating to the nuclear power chain from uranium mining to high level nuclear wastes is available in the foundational document, *Always Changing, Forever Yours: Nuclear Fuel Wastes (Leaders Guide)* (2009)<sup>3</sup>.

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<sup>3</sup> United Church of Canada. Social Policy. *Always Changing, Forever Yours: Nuclear Fuel Wastes*. January 30, 2008. Leaders Guide published 2009.  
<https://generalcouncil.ca/document/always-changing-forever-yours-nuclear-fuel-wastes>

