



The Joint Chiefs and Councils
of the Saugeen Ojibway Nation

February 11, 2026

Impact Assessment Agency of Canada
160 Elgin Street, 22nd Floor
Ottawa, ON K1A 0H3

Re: Wesleyville New Nuclear Project Initial Project Description

We write to provide the Saugeen Ojibway Nation's ("SON") comments on the Initial Project Description ("IPD") submitted by Ontario Power Generation ("OPG") for its proposed New Nuclear at Wesleyville Project (the "Project" or "NNW").

The SON People and Territory have experienced significant impacts from the development of the nuclear industry in Ontario over the last six decades. Without consultation or consent, the SON Territory has come to house the world's largest operating nuclear facility, the vast majority of Ontario's low and intermediate-level nuclear waste, and a significant proportion of Canada's used nuclear fuel.

SON has called on Canada, Ontario, and the nuclear industry to address the impacts caused by the nuclearization of the SON Territory. And we have been clear that new nuclear projects in SON Territory, as well as any increase in the management and storage—including transportation—of nuclear waste within SON Territory, cannot occur without addressing those impacts and securing our consent.¹ It is for these reasons that throughout the Darlington New Nuclear Project regulatory proceedings, SON was unequivocal that we would not allow OPG to rely on, and exploit, the SON Territory to support the expansion of its operations. We were explicit that the Western Waste Management Facility ("WWMF") could not be used to store waste from new projects located outside the SON Territory.

Notwithstanding SON's position, OPG's IPD leaves open the possibility that the WWMF could be used as a potential site for the management and storage of nuclear waste generated by the Project. We will not accept this. The WWMF cannot be used to store waste from the Project. From the very

¹ To date, nuclear legacy issues remain unresolved. The lack of progress towards resolving these issues prompted SON Joint Council to pass a resolution declaring that SON will no longer permit the unjust exploitation of our Territory by the nuclear industry, including the continued transportation and storage of nuclear waste, without fair and equitable resolution.

outset of the impact assessment process, OPG must fully identify and evaluate options for the management and storage of waste on-site or elsewhere outside the SON Territory.

In the pages that follow, we provide further background and detail regarding SON's concerns.

Saugeen Ojibway Nation

SON is comprised of the Anishinaabe People of the Chippewas of Nawash Unceded First Nation and Chippewas of Saugeen First Nation. Anishinaabekiing, SON's Territory encompasses much of the Saugeen (Bruce) Peninsula, extending down south of Goderich and east of Collingwood. The waters surrounding these lands and the lakebed of Lake Huron from the shore to the international boundary with the United States and to halfway across Georgian Bay are also part of SON's Territory.

SON's ancestors have used and occupied Anishinaabekiing since time immemorial and its People continue to do so today. SON's Territory consists of everything integral to life—the lands, rivers, lakes, winds, plants, animals, and fish. Anishinaabekiing has sustained SON People physically and spiritually for countless generations and must continue to do so far into the future.

Nuclearization of Anishinaabekiing

The development of the nuclear industry in SON Territory has played a major role in shaping the land and SON People's place within it.² Without consultation or SON's free, prior and informed consent ("FPIC"), SON became host to:

- Canada's first commercial-scale Canada Deuterium Uranium reactor at Douglas Point;
- the world's largest operating nuclear facility at the Bruce site;
- the vast majority of Ontario's low and intermediate level waste (together, "L&ILW") at the WWMF;
- the Western Clean-Energy Sorting and Recycling Facility; and
- Nearly 45 percent of Canada's used fuel.³

OPG has been transporting nuclear waste to SON Territory without SON consent for more than 45 years. This infringement of SON's rights is compounded daily as OPG continues to make approximately 700 shipments of nuclear waste annually to SON Territory.⁴

² The history and current reality of the nuclear industry in SON Territory has been described in previous SON submissions, including the licensing of the Western Waste Management Facility and the Joint Review Panel for Ontario Power Generation's deep geological repository for low and intermediate level wastes proposal.

³ Nuclear Waste Management Organization, [Nuclear Fuel Waste Projections in Canada – 2023 Update](#) at 4.

⁴ Letter from Laurie Swami (Senior Vice President, Decommissioning and Nuclear Waste Management, Ontario Power Generation) to Marc Leblanc (Commission Secretary, Canadian Nuclear Safety Commission) (May 16, 2016), [Application for Renewal of Western Waste Management Facility Operating Licence](#) at PDF 20, section 1.3.2.

The nuclear industry has consistently minimized SON's rights and excluded SON's perspectives, requests, and desires throughout its history, all while heavily utilizing SON Territory to support its development. SON's FPIC has never been obtained.

Wesleyville Initial Project Description

On January 12, 2026, OPG submitted its IPD for the Project in Port Hope. Notably absent is a clear plan for waste management. Instead, OPG relies on vague references to "future options for the interim storage of L&ILW and spent fuel on-site or in an off-site licensed facility", without further elaboration.⁵

Alternative means for carrying out the Project, including alternatives for the management of low, intermediate, and high-level waste, are set out in sections 2.3.5-2.3.6 of the IPD. These alternative means contemplate off-site options for the interim management, storage, and disposal of nuclear waste. Presumably, the "off-site licensed facility" to which OPG refers in its IPD is the WWMF in SON Territory. SON is unaware of any other off-site licensed facility to which OPG transports large volumes of low and intermediate-level waste from its other facilities.

OPG's stated alternatives for the management of low and intermediate-level waste are as follows:

Short- (interim storage) and long-term (disposal) alternative management and storage options are being considered including alternative on-site and off-site options, and will consider, reduce, and mitigate, where possible, real and potential impacts to the rights of the WTFNs, as well as feedback from engagement with interested Indigenous and local communities.⁶

OPG's stated alternatives for the management of high-level waste are as follows:

Alternatives being considered include interim storage and long-term management of the High-Level Waste (HLW). This includes transferring HLW into fuel-specific dry storage containers which will either be stored on-site in a new, purpose-built facility or transferred to a disposal facility operated by the Nuclear Waste Management Organization (NWMO) or another appropriately licensed facility. The assessment of these alternatives will consider, reduce, and mitigate, where possible, real and potential impacts to the rights of the WTFNs, as well as feedback from engagement with interested Indigenous and local communities.⁷

SON Concerns

a. Low and Intermediate-Level Waste

SON is concerned by the ambiguous references in the IPD to potential interim storage of low and intermediate-level waste at an off-site licensed facility. While OPG does not explicitly refer to the

⁵ OPG, "New Nuclear at Wesleyville in Port Hope: Initial Project Description" (12 January 2026) at 64 [IPD].

⁶ OPG, "New Nuclear at Wesleyville in Port Hope: Summary of the Initial Project Description" (12 January 2026) at 12 [Summary IPD].

⁷ Summary IPD at 12. See also IPD at 78.

WWMF as one of the options it will consider for the interim management and storage of nuclear waste, OPG has historically relied on the WWMF and the SON Territory to manage low and intermediate-level waste from all of its facilities. Again, SON is unaware of any other off-site facility to which OPG transports large volumes of low and intermediate-level waste. SON is concerned that OPG is seeking, in this impact assessment process, to retain the WWMF as an option for the interim management and storage of waste from the Project—an option which would compound the decades-long infringement of SON’s rights.

In their comments, the Williams Treaty First Nations (“WTFNs”) state that nuclear waste management is a fundamental part of the Project and must be studied as part of the impact assessment.⁸ They explain that decisions regarding waste management cannot be deferred to future decision points or regulatory processes, as this “limits the ability to truly contemplate the real and potential adverse impacts and effects” of the Project.⁹ SON agrees fully with the WTFNs. OPG must develop comprehensive waste management plans and strategies at the outset of the impact assessment process. OPG must include those plans, along with their potential impacts, in its Impact Statement. It is not acceptable for OPG to describe waste management options in broad and undefined terms, only to be refined at some unknown time in the future.

Additionally, and most importantly to SON, OPG’s comprehensive waste management plans cannot include WWMF as an off-site option. The development of the nuclear industry in the SON Territory has had significant impacts on SON People. SON has consistently opposed—including in the regulatory proceedings relating to the Darlington New Nuclear Project—the continued exploitation of the SON Territory to support OPG’s plans to expand its operations.¹⁰ While SON and OPG have begun discussions on whether, and under what conditions, SON could consent to the use of the WWMF for streams of waste from OPG’s existing operations—discussions which have repeatedly stalled—SON has been unequivocal that the WWMF cannot be used to manage or store waste from new projects located outside the SON Territory.

OPG’s reliance on the WWMF for the interim management and storage of nuclear waste from the Project would amount to a significant breach of SON’s rights, including those affirmed in the *United Nations Declaration on the Rights of Indigenous Peoples* (“UNDRIP”). UNDRIP mandates that no storage or disposal of hazardous material—including nuclear waste—may occur on SON’s Territory without SON’s FPIC.¹¹

ii. High Level Waste (Used Fuel)

SON is also concerned by OPG’s stated alternatives for the management of high-level waste. OPG explains that the management and storage of this waste may occur in “another appropriately licensed facility.”¹² While OPG has not historically transported used fuel to the SON Territory from its other

⁸ See e.g. IPD at 64.

⁹ IPD at 64.

¹⁰ See generally SON, “Request to Intervene and Written Submissions in Ontario Power Generation’s application for a Licence to Construct the Darlington New Nuclear Power Project” (12 November 2024).

¹¹ UNDRIP, art. 29(2).

¹² IPD at 78; Summary IPD at 12.

facilities, and SON is not aware of any plans to do so, OPG's vague reference to another appropriately licensed facility creates uncertainty as to whether this encompasses the WWMF. This uncertainty further underscores the need for OPG to develop comprehensive waste management plans and strategies at the outset of the impact assessment process. OPG must clearly identify the waste management alternatives under consideration, rather than describing waste management options in broad and undefined terms. These plans cannot include WWMF as an off-site option.

Conclusion

For over 60 years, without consent, SON has been at the heart of the development of the nuclear industry in Canada. The potential off-site management and storage of low and intermediate-level waste generated from NNW at the WWMF threatens to further this history. Longstanding legacy issues remain unresolved. It is wholly unacceptable that significant amounts of nuclear waste are already stored in SON Territory without SON's FPIC and consequently, in a manner inconsistent with law.

SON will not accept the management and storage of a new waste stream generated by the Project in SON Territory. OPG must, from the very outset of the impact assessment process, develop comprehensive waste management plans that explicitly exclude WWMF as an off-site option. OPG must include those plans, along with their potential impacts, in its Impact Statement.

Furthermore, SON is seeking confirmation from the CNSC that excluding the WWMF as an off-site option in the impact assessment process will preclude OPG from later seeking approvals to use the WWMF for the management of waste generated from the Project. SON will correspond directly with the CNSC to seek clarification on this aspect of the regulatory process.

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<Original signed by>

Paul Jones
Co-Chair of the SON Nuclear Advisory Committee