



Response to IAAC's Draft Integrated Tailored Impact Statement Guidelines  
David Robertson, Chair, Ontario Project -SCAN!  
April 14, 2026

The Impact Assessment Agency of Canada (IAAC) has posted the Draft Integrated Tailored Impact Statement Guidelines for public comment.

The Ontario government is planning to build the world's largest and most expensive nuclear complex on the shore of Lake Ontario at Wesleyville in Port Hope. Ontario Power Generation (OPG), the government's wholly owned electricity generating company, is the proponent of the project. The project is subject to the federal Impact Assessment process.

There were more than 700 submissions made to the impact assessment process in response to OPG's initial project description. Many of them were from local residents, and others were from community, environment and climate action groups. Concerns were expressed over health issues and the risks associated with nuclear waste. Many of the submissions expressed fears for species at risk and the detrimental impacts on the natural environment.

A central and recurring theme of the submissions was the need to consider alternatives.

People expressed concern over OPG's cavalier dismissal of the need to consider alternatives. "No alternatives are being considered", OPG asserted in its initial project description. But more concerning is the Impact Assessment Agency of Canada's (IAAC) agreement with the nuclear proponent's position.

In its Summary of Issues, the IAAC relegated consideration of alternatives to what it described as the annex. The annex is where the IAAC put those citizen concerns that it gave OPG the freedom to ignore.

Now the IAAC has compounded the problem.

Section 2.8.3 (p17) of the Draft Integrated Tailored Impact Statement Guidelines concludes:

"IAAC will rely on the proponent's Initial Project Description demonstrating that there are no alternatives to the project that are technically and economically feasible to meet the

need for the project and achieve its purpose. The selection of electricity generation technologies and the broader energy supply mix in Ontario are matters determined through provincial energy planning and policy processes, including Ontario's Integrated Energy Plan".

It is a surprising development. The Impact Assessment Act clearly states that alternatives should be considered. Under the heading Factors to be Considered is this relevant provision:

Section 22.1. (f) any alternatives to the designated project that are technically and economically feasible and are directly related to the designated project;

Many of the submissions to the Initial Project Description stressed this point.

Even in its 'Guidance' to proponents the IAAC notes: "The information in the Initial Project Description provides the necessary context for Indigenous peoples, the public and other participants to support meaningful early engagement on alternatives."

Instead of supporting "meaningful early engagement on alternatives" the IAAC chose an interpretation that allows a proponent to avoid a review of the alternatives where the proponent is acting on the wishes of the government. Its "Guidance" to proponents provides OPG this off ramp: "The alternatives to the project need not include alternatives that are contrary, or not consistent with...a province's formal plans or directives."

It also states that "an assessment of energy mandates established through federal and the provincial legislation/policy **may not** be within the scope of the assessment." (emphasis added)

OPG cites these points in its refusal to consider alternatives. Unfortunately, the IAAC has too readily accepted OPG's interpretation.

Instead, the IAAC could have recognized that renewable energy sources, as an alternative to the nuclear project, are not inconsistent with the "province's formal plans or directives". And it could have pointed out that the choice of the words "may not" is different than the words "will not". Here, there is an element of discretionary interpretation.

OPG reinforced its refusal to consider alternatives in more detail in its response to the IAAC's Summary of Issues. This is OPG's argument: OPG is an arm of the government whose job it is to develop energy sources in line with government policy and priorities. The government has laid out its energy direction in its integrated energy plan, "Energy for Generations." In that document the government is committed to the building of nuclear reactors, describing nuclear as "the backbone of the province's electricity system". Finally, it is the Ontario government who will make the final decision about Wesleyville, not OPG.

That nuclear is to be the ‘backbone’ of the province’s electricity system does not mean that alternative sources of electricity to any proposed project should be excluded. In fact, in its Initial Project Description OPG notes a report from Ontario’s Independent Electricity Systems Operator (IESO) which “adopted a holistic approach to evaluate and consider multiple low-carbon technologies that could satisfy the projected growth of Ontario’s future energy needs. The assessment led to the recommendation of a diverse energy mix, where nuclear power is just one component among several”.

In its response to the Summary of Issues OPG repeats the point by referencing an IESO report which “affirmed the need for an all-of-the-above approach that continues to integrate new energy sources, as well as new nuclear and hydroelectric generation, to ensure the electricity system can meet growing demand in a cost-effective way.”

Stephen Lecce, Minister of Energy and Mines has, on more than one occasion, proposed a technology agnostic approach to energy development. In a letter to the IESO in August 2024, Minister Lecce stated: “I expect the IESO to report back on an approach that is technology agnostic...”

“Holistic” “all of the above,” “technology agnostic”, “diverse energy mix”. Since the Ontario government is saying that it is pursuing a range of energy technologies, then to consider alternatives to nuclear at Wesleyville, is not contrary to government policy.

When one adds to that the issue of cost, then the case for a review of alternatives becomes even more compelling.

In its response to the Summary of Issues, OPG notes that it “carefully plans every project and investment it undertakes, to ensure it delivers long-term value for customers and the province.”

The notion of long-term value to customers is rapidly changing. The IESO has recently announced what Energy Minister Lecce describes as the “biggest renewable energy move in a decade”.

Wind and solar projects have recently won, what the IESO describes as a “robust competition” to supply electricity “into the 2030’s and beyond”. Those projects won the procurement because they are the cheapest sources of electricity. This points to an energy transition where the accepted ways of doing things are being upended by a rapid expansion of cheap renewables.

The decision to exclude consideration of a range of energy technologies in the Impact Assessment process for Wesleyville is short-sighted public policy and can inadvertently undermine regulatory independence.

The language in its Guidance to Proponents clearly suggests the possibility that alternatives might not be considered. But to translate that possibility into a categorical

refusal to consider alternatives narrows the scope of the impact assessment and imposes too many restrictions on “Indigenous peoples, the public and other participants” in their efforts for meaningful engagement.

The Draft Integrated Tailored Impact Statement Guidelines should be amended to require OPG to provide an objective and comprehensive review of the alternatives to the Wesleyville nuclear project. Solar, wind and storage meet the IAAC’s criteria of alternatives that are “technically and economically feasible” and they are already part of the province’s energy mix. They are also much cheaper and quicker to build.