



May 7, 2026

From: The Port Hope Community Health Concerns Committee

www.porthopehealthconcerns.com

porthopehealthconcerns@pm.me

Comments Submitted to the Impact Assessment Agency of Canada

Re: New Nuclear at Wesleyville in Port Hope Project Ref. 89802

Title: Saying NO to New Nuclear at Port Hope (Wesleyville)

May 7, 2026: “ Draft Public Participation Plan” Comments:

- The current timeframes for responses to Registry documents are too short to allow adequate notice to be properly informed, inform others and develop responses.
- The current timeframes and funding made available limit the ability of members of the public to organize and hold public meetings together and arrange experts to broaden information available to the public and encourage participation in the IAAC process.
- All input to the Registry is not appearing in the summaries of issues as it should including the potential barrier of relevant legislation such as Bill c-226 on Environmental Injustice which our Committee submits should cause OPG to withdraw its Project Proposal for Port Hope at Wesleyville now, saving taxpayer money.
- There is a fundamental flaw in the process with the public being asked to comment on very limited information made available on the Registry so far from OPG/IAAC which is allowing the Project to continue forward stage by stage without proper public scrutiny of extremely important Project details. These include choice of reactor design and if enriched uranium will be required, the source of the material - will it be Cameco in Port Hope or the U.S.?, the high-level waste storage plan, no analysis of potential alternatives to this Project or projected costs, insufficient attention and details of Port Hope's nuclear context of two polluting Cameco facilities in our midst and a \$2.6 billion federal remediation of 2 million cubic metres of wastes ongoing in our community with issues. Without more comprehensive information on which to comment, public participation becomes little more than a process that is just checking boxes.
- The reach of IAAC and OPG communications should be municipal, county, provincial and national in scope as all are impacted by this Project in a variety of ways including the extraordinary expenditure of taxpayer money, possible production and use of enriched uranium in reactors in Canada, daily operational health risks, and impacts with

global consequences with malfunctions, accident and security risks, need for future high level waste management on site and elsewhere, irreversible environmental damage, loss of valuable farmland, culture and way of life, with stated federal/provincial intentions to increase Canada's trade deals and investment in nuclear energy for domestic use and export. All of these are consequences that impact locally and beyond,

- The information from OPG whether in writing or verbally must not be inaccurate or misleading. At an OPG Wesleyville Project session on May 6th in Port Hope a senior OPG staff hosting a display on land use told me when I asked about the emissions that there would be no emissions from the planned Wesleyville site of the largest nuclear reactor complex in the world. When I contradicted this saying there would be emissions as there are at all the reactor sites particularly of tritium, the senior staff called over a colleague who confirmed yes there would be emissions. This is one example of misinformation happening at OPG sessions with the public.
- Another example is the audience last evening being told that high level waste from a Wesleyville reactor site will go to a new solution of a Deep Geologic Repository (DGR) with no discussion, presumably referring to the DGR Project currently being assessed under the IAAC near Ignace close to the Manitoba border. This is misleading for three reasons: 1) the people there are being told no new high level waste will be brought there other than most of the waste that exists now at reactor sites which would not include Wesleyville 2) the proposed DGR is in the IAAC process, not approved to go forward so there is no other solution yet beyond storing the waste in Port Hope or at other OPG sites nearby. A concern is the possibility of a second DGR near Port Hope in the near future 3) the DGR technology is an experiment with unproven technology anywhere in the world so it has no success to point to as a solution for the planned Port Hope or other site wastes and is not yet approved here which should be said.
- Another confusing OPG presentation point is what exclusion or buffer zone is required, what lands particularly farmland at and around Wesleyville will be directly and indirectly impacted, how and when will they be impacted, as OPG is advertising having other industries co-locate nearby on lands they don't own now. Will Cameco co-locate and further contaminate the area and how that other land will be acquired are questions.
- Rather than talking with a blank slate of unknowns, OPG could be giving presentations that tell us details of their operational experience and data from operating the Bruce, Pickering and Darlington - reported incidents/accidents, injuries to workers, complaints from the community, security guards and perimeter, volume and content of emissions to air and water, volume of high level wastes, methods and volume of transportation in and out - lake, rail, road? This kind of information helps people make informed decisions about what could lie ahead and not feel so much like they are asked to give a blank cheque for any future decisions.

May 7, 2026: “Draft Integrated Tailored Impact Assessment Guidelines” Comments

Part 1: The Highest Priority Must Be Applying the Precautionary Principle to - Preserve Health and the Environment Now and for Future Generations

- Federal Bill c-226 (2024) gives communities like Port Hope legal protection from further environmental injustice which directly impacts our health, safety and security. The Ontario government and OPG should withdraw this proposal immediately.
- The Port Hope community has been living with more than 2 million cubic metres of radioactive wastes all around the town for generations from the operation of Crown Corporation Eldorado Nuclear from the 1940's until 1988. There are also two Cameco nuclear operations in our midst without buffer zones, with daily emissions of uranium, fluoride and other contaminants to air, vegetation and water of the Ganaraska River and Lake Ontario. Port Hope Harbour is still an official Area of Concern for the International Joint Commission on the Great Lakes because of this contamination.
- There is no ongoing health monitoring of the individuals and families in Port Hope even those who are or have lived on contaminated properties, are experiencing the additional exposure risks of remediation or were regularly exposed in other areas of town requiring remediation such as schools, playgrounds, beaches or workplaces. Everyone has exposures from the air on a daily basis.
- There should be a thorough consideration of important health outcome data for Port Hope. Studies which focused on Port Hope health outcomes in earlier time periods showed elevated rates of radio-sensitive cancers and non-cancer diseases at the 90% and 95% confidence interval indicative of possible environmental causes, and the presence of industrial uranium isotopes (including ²³⁶U, depleted U and elevated ²³⁴U radiological Port Hope UMRC project participants :
 - a) *Study of the Health Effects of Low Level Radiation Contamination in Port Hope Homes, 1984* (Queen's University Study)
 - b) *Port Hope Harbour Area of ConcernL Health Data and Statistics for the Population of the Area, 1986 - 1992*. Great Lakes Health Effects Program, Health Canada, 1997
 - c) *Cancer Incidence in Port Hope*, Health Canada/CNSC 2000
 - d) *Cancer and General Mortality in Port Hope 1956-1997*, Health Canada/CNSC 2002
 - e) *Critiques of Health Canada's Cancer Incidence Study and General Mortality Study*, Dr.Eric Mintz, 2000, 2004.
 - f) *Radiobiological Project in Port Hope*, Uranium Medical Research Centre 2007
- On page 43 of the Initial IAA Summary Report the statistic of 33.9% premature mortality in this Public Health District is given without a comparison and not explained. Also the leading causes of death are given as cancer and ischaemic heart disease both of which are radiologically sensitive diseases. This is consistent with study findings for Port Hope specifically in earlier studies noted above. The way this statistic is presented basically buries the data in way that is not helpful to understanding relationships to possible causes such as exposures in Port Hope which happens all too often. Ascribing these data to the District as a whole, which comprises a huge geography and population east and north of Port Hope including the City of Kawartha Lakes, the County of Haliburton, Northumberland County, and the City and County of Peterborough should lead to further investigations. A full EA should investigate all available data that could be meaningful.

- Include consideration of the U.S. legislation (Radiation Exposure Compensation Program, Energy Employees Occupational Illness Compensation Program) which recognizes more than 40 diseases as associated with ionizing radiation from nuclear industry exposures to workers and community downwinders (as we are in Port Hope) and has paid out more than \$20 billion in compensation. Canada has no similar legislation to recognize and compensate for health effects on workers or communities and it is needed to reconcile what has happened in Canada..
- Our Committee argues the need for compensation for former and current Port Hope individuals and families as well as a national public inquiry into radioactive waste management in Canada, past, present and future starting with Port Hope to help ensure precautionary policies and practices are adopted and mistakes properly acknowledged and rectified.
- Other Important health research studies to include:
 - g) *International Workers Studies (INWORKS) 2015, 2017, 2018, 2023*
Overall, these studies found strong evidence of positive associations between chronic low-dose radiation exposure and risk of death from leukemia, all solid cancers combined, many site-specific solid cancers (the most common being lung, prostate, and colon), and non-cancer causes (circulatory diseases primarily). Risk of death increased with cumulative dose for all solid cancers combined.
According to the 2023 INWORKS study, the risk of radiation-induced solid cancer mortality resulting from chronic exposure to low doses of radiation may be slightly higher than previously reported. The study supports a linear association between prolonged low-dose external exposure to ionizing radiation and solid cancer mortality.
 - h) *Health Risks of Radon and Other Internally Deposited Alpha-Emitters: BEIR IV - Committee on the Biological Effects of Ionizing Radiation*, National Research Council, U.S.
 - i) *Health Risks of Exposure to Low-Level Ionizing Radiation - Phase2 BEIR VII*, 2006, National Research Council, U.S.

Also, Include examination of references listed in comments submitted to the IAAC Registry by Robert and Dale Dematteo May 7, 2026:

- j) 1. Ro ting lin et al (2024). *Health effects of occupational and environmental exposures to nuclear power plants*. Environmental Health 11:329-339.
- k) 2. Public Health Agency of Canada (2018). *Childhood cancer incidence in Canada: demographic and geographic variations of temporal trends 1992-2010*.
- l) 3. Awaldi Y et al (2026). *Proximity to nuclear power plants associated with increased cancer mortality*. Nature Communications (February 23, 2026).
- m) 4. Wing S et al (2010). *Cancer risks near nuclear facilities: the importance of research design and explicit study hypotheses*.
- n) 5. Lee GB et al (2025). *Incidence of solid cancers among residents near nuclear facilities: a systematic review and meta analysis*. BMC Public Health.25:1690
- o) 6. Mangano J and Alvarez R. (2025). *Why a national cancer study near US*

reactors must be conducted before any new expansion of nuclear power. Bulletin of the Atomic Scientists, <https://thebulletin.org/2025/09/why...>

- p) 7. Kaatsch P et al (2008). *Leukemias in young children living in the vicinity of German nuclear power plants*. Int J Cancer, 122;721-726.
- q) 8. Folkers C et al (2022). *Radioactive releases from the nuclear power sector and implications for child health*. BMJ Pediatrics;6 e001326.
- r) 9. Dingwell S et al(2011). *Human health and biological effects of tritium in drinking water: prudent policy through science Addressing the ODWAC new recommendations*. Dose Response; 20(9)6-31.
- s) 10. Fairlie I. *Tritium Hazard Report: pollution and radiation risk from Canadian nuclear facilities*, June 2007. Greenpeace.
- t) 11. Faqiin Y et al (2025). *Uranium's hazardous effects on humans and recent developments in treatment*. Ecotoxicology and Environmental Safety. 203(2025)118043,
- u) 12. Ma M et al (2020). *Emerging health risks and underlying toxicological mechanisms of uranium contamination: lessons from the past two decades*. Environment International. 145(2020)106107.
- v) 13. Kumar R et al (2025) *Nanotoxicity unveiled: evaluating exposure risk and assessing impact of nano particles on human health*. Jour of Trace Elements and Minerals. V13/Sept 2025.
- w) 14. Zhang L et al (2022). *Health effects of particulate uranium exposure*. Toxics 10(10)575

Part 2: Knowledge of Risk and Harm:

- a) *"There is no safe level of exposure and there is no dose of radiation so low that the risk of a malignancy is zero"*
 - Dr. Karl Z. Morgan, founder and the father of Health Physics, Director of Health Physics at Oak Ridge from 1943 to 1972.

 - b) *"No amount of ionizing radiation is safe"*
 - Dr. John Gofman, M.D. Ph.D Nuclear/Physical Chemistry, Director/Founder of the Lawrence Radiation Laboratory Division Biology and Medicine, Lawrence Livermore Laboratory.

 - c) *"For a given uranium intake, the inhalation pathway gives doses 200 times greater than ingestion"*
 - Ontario MOE Rationale Document, Draft Uranium in Air Standard, 2010
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Part 3: Apply Bill c-226 Environmental Justice Principles and Protections

Based on the painful historical and current contexts of Wards 1 and 2 (previously Hope Township) of the community of Port Hope with the nuclear industry and its emissions/wastes, this Ontario Government / OPG proposal for New Nuclear at Port Hope (Wesleyville), to be the largest nuclear plant in the world, should be unthinkable to those in power with responsibilities to protect us and correct decades of environmental injustice.

Instead this New Nuclear Project has been proposed by the Ontario Government and OPG for Port Hope and promoted from the outset with total disregard for the difficult history and current realities of this area, the experiences of people who have lived for many years with daily cumulative radiological exposures and well documented risks to health, security, air, public and private lands, waters, wildlife, aquatic life, vegetation, financial wellbeing.

All of this has been imposed on the community from the 1940's to present day by the federal government, the nuclear regulator and industry without the knowledge and informed consent of the people who live with the decisions and consequences on a daily basis. The lack of concern for health effects is demonstrated by the persistent lack of monitoring of human health impacts despite the massive \$2.6 billion federal remediation underway and daily insoluble particulate in emissions from two operating nuclear facilities; for example, federal health data showing elevated rates of radio-sensitive diseases in the community and the presence of industrial uranium in people are consistently dismissed with no followup investigations.

We submit that approval of OPG's Proposal will perpetuate environmental injustice.

On June 20, 2024, the Private Member's Bill c_226, "National Strategy Respecting Environmental Racism and Environmental Justice Act" became law. There is no single definition of environmental justice that is accepted by everyone or reflects all scenarios. Instead, environmental justice is considered a concept that can be applied in various practical contexts...it is broadly understood to include

- a) *Procedural Justice: "means people must have fair access to decisions that affect their environment"*
- b) *Recognitional Justice: "means policies should respect the experiences, values, and histories of affected communities, especially those facing systemic racism"*
- c) *Distributive Justice: "means environmental harms and benefits should be shared fairly across all communities"*

The Minister must develop a national strategy (expected by June 2026) to promote efforts across Canada to advance environmental justice and to assess, prevent and address environmental racism. The strategy must include

- a) A study that includes i) an examination of the link between race, socio-economic status and environmental risk, and ii) information and statistics relating to the location of environmental hazards and

- b) Measures that can be taken to advance environmental justice and assess, prevent and address environmental racism and that may include
 - i) Possible amendments to federal laws, policies and programs
 - ii) The involvement of community groups in environmental policy making
 - iii) Compensation for individuals or communities and
 - iv) The collection of information and statistics relating to health outcomes in communities located in proximity to environmental hazards.
- Source [Canada.ca](https://www.canada.ca), Environment and Climate Change Canada
- Port Hope's long history with the federally licensed nuclear industries in town without buffer zones from the 1940's forward, a Crown Corporation from 1944 to 1988 when 2 million cubic metres of its radioactive wastes were used as fill, dumped throughout the town, into the rivers and Lake Ontario, is evidence of ongoing environmental injustice to generations of people which must be corrected.
- We submit that the Ontario government/ OPG Proposal to situate the largest nuclear power plant in the world in Port Hope, adding to its disproportionate nuclear industry human and environmental impacts, clearly violates Bill c-226 and should be withdrawn.

Part 4: Recommendations:

1. The OPG proposal for New Nuclear at Port Hope (Wesleyville) should be withdrawn as compounding environmental injustice and impacts on a community that has been and continues to be a severely impacted federal nuclear sacrifice zone from the 1940's to the present day without their knowledge and informed consent and without any federal reparations.
2. Apply the rationale for the federal Environmental Assessment Panel (1978) which refused approval for Eldorado Nuclear Ltd to build a new Uranium Hexafluoride facility at Port Granby, less than 5 km from Wesleyville.
3. If OPG withdraws this New Nuclear Proposal, OPG should consider alternatives including safer, cleaner energy projects for the site subject to thorough public environmental assessments or resume selling the site to the Municipality of Port Hope for local use as was happening until stopped by the Ontario Government in 2023
4. If the Proposal is not withdrawn by OPG a comprehensive independent Environmental Assessment Review with public hearings and cross-examination of evidence and witnesses with appropriate Participant Funding is essential to fully assess this Project in all terms outlined, the issues described above
 - Thorough examination of the current Port Hope nuclear context and cumulative effects
 - Relevant EA reports: Eldorado Nuclear/Port Granby Review Panel 1978, Cameco EAs, AECL/CNL Port Hope EAs
 - Municipal, First Nations and public roles in decision-making

- Honouring the UN Declaration on the Rights of Indigenous Peoples for Free, Prior and Informed Consent
- Evidence of purpose, need for this energy Project
- Examine safer, cleaner energy alternatives for Ontario such as wind, solar, storage, geothermal, hydro
- Location, Wesleyville Village, impacts on protected natural areas
- Emissions to air, water, vegetation
- Socio-economic impacts
- Buffer zone size that will be required
- Impacts of preparations, construction, operations, decommissioning
- Security perimeter, military presence
- Reactor type, fuel and source - enriched uranium possibility
- High level wastes volume, storage, transportation
- Transportation during all phases in and out of sites
- Construction during all phases
- Transmission of power corridor, amount of land and buffers required
- Monitoring, Reporting, Regulation to public and regulator
- Insurance for site, beyond fencelines for public and private areas
- Responsibility and compensation for damages
- Property value protection for area residents, businesses
- Amount of public subsidies, informed consent of Ontario taxpayers

Part 5: Include 1978 Report of the Federal Environmental Review Panel's Refusal of Eldorado Nuclear Proposal for Uranium Hexafluoride Operation at Port Granby, 5 km west of Wesleyville

- After two years of study in 1978 the federal Environmental Assessment Review Panel did not approve Eldorado Nuclear's proposal to build a new uranium hexafluoride UF6 plant at Port Granby (less than 5 km west of Wesleyville) citing several reasons including: location should not be used for industrial purposes as it is an area with acres of high value agricultural land with suitable climate which Ontario needs to conserve, has acres of protected species bio-diversity, objections of First Nations and area residents, did not approve Eldorado's waste storage plans for the site due to geology and unproven technology proposed.
- The research conducted for this Panel, the interventions, analysis and conclusions are all relevant to properly assessing siting the largest nuclear plant in the world at almost the same location with much the same circumstances only worse.
- According to the Ontario Federation of Agriculture in 2021 only 5% of Ontario land is arable farmland. Today Ontario is losing an average of 319 acres of farmland a day. It is a serious national security issue to protect valuable farmland as the Panel so wisely decided in 1978, 50 years ago. It said the area should be protected and not have industrial development.

Part 6: Brief Historical and Current Port Hope Context

- Wesleyville Village is a 19th century village, situated near previous seasonal settlement areas and annual gathering places of the Michi Saagiig Anishinaabeg, as informed by MS-WTFNs. The village is under restoration by the organization Wesleyville Village with the support of the Ontario Trillium Foundation and initial funding provided in the OPG lease agreement towards exterior renovations of the buildings on the leased lands. Ontario Hydro acquired several properties in the village and surrounding farms in the late 1960s to build the Wesleyville oil-fired power plant that was not commissioned. While several structures were removed, the core of the village remained, including the 1860 church, the 1899 one-room schoolhouse, and the Y-shaped house located on a lot beside the church, known as the Oughtred house. (source Friends of Wesleyville website)
- The urban Port Hope community has two Cameco nuclear facilities operating within the town boundaries with daily insoluble radioactive particulate emissions impacting air, soil, water and vegetation. These industries are applying for and one has been granted a 20 year license thereby reducing public involvement even further. Both transport dangerous materials emitting radiation through the streets, both produce forever dangerous toxic wastes. The presence and cumulative impacts of both must be included in a full EA.
- The federal government has contracted with AECL for a \$2.6 billion remediation of Crown Corporation Eldorado Nuclear's radioactive wastes in more than 1300 public and private random locations in Port Hope where people have been exposed unknowingly for decades. The cumulative impacts must be included in a full EA.
- The \$2.6 billion AECL/CNL remediation of Port Hope is now being implemented to allow property owners to refuse CNL access even to determine how much volume of waste is on their properties. As a result unknown content and quantities of radioactive wastes will be left in Port Hope if this is permitted to continue. A number of residents are experiencing great difficulty with the remediation process for a range of reasons and are in need of support which we are advocating for to authorities.
- The Municipality of Port Hope was engaged in negotiations to purchase the OPG site at Wesleyville until 2023 for local uses, preserving the rural identity which is highly desirable by many citizens.
- CNSC has consistently dismissed health risks and documented elevated rates of radiation sensitive diseases from 1983 (Queen's Lees Study), 1997 (Health Canada Great Lakes Health Effects Study) 2000 (Health Canada/CNSC Cancer Incidence Study), 2002 Cancer and General Mortality. In 2007 the Uranium Medical Research Centre released findings on radio-biological urine bi-assays of 4 former Port Hope nuclear workers, 3 residents and 2 controls which showed the presence of industrial uranium isotopes in the residents and ill former workers, additionally 236U in one worker showing recycled uranium had been brought into Port Hope, and depleted uranium in

another worker many years after employment. Followup health outcome monitoring was refused. No ongoing health monitoring is occurring of residents despite years of requests even though many are going through additional radiation exposures during property cleanups.

- The findings of these and other studies including two independent epidemiological Peer Reviews of Dr. Eric Mintz should be independently reconsidered in view of the U.S. legislation which compensates nuclear workers and community downwinders under two pieces of legislation - “The Radiation Exposure Compensation Act” and “The Energy Employees Occupational Illness Compensation Act which recognize in law almost 40 diseases resulting from exposure to radiation for nuclear workers and downwinders such as Port Hope, and together have paid more than \$30 billion.
- It is critical to include historical and current research and evidence from independent experts on the harmful effects of radiation and proximity to nuclear facilities and not accept the assurances of federal departments including the CNSC, all with conflicts of interest, that the health of the people in Port Hope is protected when science and medicine say that is false, the limited data says it is false and obviously so.
- There has been no federal recognition of the injustice and harm caused in many respects to this community nor have there been reparations for the people as we are calling for.
- The Municipality of Port Hope, First Nations and the people of the area lose power and control over future decisions regarding the nuclear industries and what they actually do.

Part 7: Honour Requirement for First Nations Consent

Excerpts from OPG New Nuclear at Wesleyville (Port Hope) Project - Summary of the Initial Project Description of a Designated Project.

- “Port Hope and the NNW site are within the lands and waters of the shared traditional and treaty territory of the Chippewa and Michi Saagiig Anishinaabeg Nations, collectively known as the Williams Treaty First Nations”.
- “OPG has heard the WTFNs’ perspective on the importance of the concept of Free, Prior and Informed Consent (FPIC), as a mechanism to enable their meaningful participation in decisions that may impact their treaty and traditional territories. With respect to FPIC, the WTFNs have expressed the view that Articles 29(2) and 32(2) of UNDRIP introduce an Indigenous consent requirement for certain government decisions, particularly for decisions authorizing the storage of hazardous materials in the territories of Indigenous peoples....OPG looks forward to advancing the NNW Project as partners”.

Part 8: Final Comments

- This proposed Project should be withdrawn by Ontario and OPG as perpetuating environmental injustice to the people of Port Hope and area.
- Many details unknown, review panel EA needed with public hearings if it proceeds
- Largest nuclear plant in the world will present high risks to health, safety and security.
- Enriched uranium from the US is needed for Darlington SMRs, possibly Wesleyville reactors depending on type selected.
- Site plus buffer zone will destroy valuable farmland
- Daily radioactive emissions are inhaled, impact environment, Lake Ontario, watershed,
- Location on the Great Lakes Basin impacting two countries, drinking water for millions
- Produces high level waste adding to a global problem without a solution needing management, transport, safe long-term storage.
- High level terrorist target = high level security, emergency plans needed.
- Truck transportation needs roads, accident risks, disrupts traffic, radioactive, CO2 emissions.
- Transmission wires, towers need more land and buffer zones.
- Disruptive preparations, construction, operations, decommissioning planned over many years at both east and west ends of the property.
- As Low As Reasonably Achievable (ALARA) taking social and economic considerations into account is a CNSC Principle that is used to serve industry interests not people.
- CNSC as the federal nuclear regulator has a dismal record protecting the people of Port Hope. We have every reason to believe this failure by the CNSC will continue.

Thank you for considering the recommendations and comments from the Port Hope Community Health Concerns Committee.

Submitted by Faye More, Chair

On behalf of the Port Hope Community Health Concerns Committee

Email: porthopehealthconcerns@pm.me

Website: www.porthopehealthconcerns.com