

## **Comments on the Draft Integrated Tailored Impact Statement Guidelines Submitted by Deborah Irwin, Resident of Port Hope May 7, 2026**

Thank you for the opportunity to provide comments on the Draft Integrated Tailored Impact Statement Guidelines. I have two requests to the IAAC as the requirements of the Impact Assessment are finalised:

1. Insist OPG present the case for nuclear vs. alternatives (renewables)
2. Insist OPG present a complete project plan, with critical decisions made, before the Impact Assessment begins

### **OPG must present the case for nuclear vs. alternatives, and it is IAAC's job to make sure they do.**

The Draft Integrated Tailored Impact Statement Guidelines specify that the *"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."* (2.8.3) However OPG's Initial Project Description notably did not include an evaluation of alternatives, and this omission was pointed out in the majority of comments received on the initial project plan.

Ontario's Integrated Energy Plan - Energy for Generation is not an Impact Assessment. When Ontario developed this plan, they did not do a thorough assessment of the potential impacts of nuclear, solar, on-shore wind or on-shore wind. By not requiring OPG to present a thorough assessment of the alternatives to nuclear, IAAC is giving a strategy document the weight of an Impact Assessment. In the feedback provided by residents and organisations to OPG's initial "concept of a plan" - the demand for a proper assessment of the alternatives to nuclear generation was very clear. In continuing to allow OPG to circumvent this most basic requirement of an Impact Assessment, IAAC is not fulfilling their mandate:

*"Without impact assessments, [a] development can have serious negative effects on the environment and the way of life in nearby communities. Our job is to consider what people have to say about how major projects may be developed. Not only do we lead on the assessment of environmental impacts...But also economic impacts ... socio-cultural impacts ...and health impacts."* (From 'Discover the Impact Assessment Agency of Canada)

By giving OPG a 'free pass' to a nuclear solution, IAAC may be exposing Ontario's businesses and residents to adverse impacts that could be avoided - in particular environmental, economic and health impacts that may be associated with nuclear, and not alternate power generation options. Two clear potential adverse impacts of nuclear that could be mitigated by choosing renewable energy generation are::

- Economic burden: nuclear generated electricity is the most expensive electricity, and is projected to get even more expensive relative to solar and wind as costs associated with renewables - both generation and storage - continue to decline. The cost to service the capital requirements of building nuclear will have to be passed on to consumers who will

be increasingly dependent on electricity to heat and power their homes, and power their vehicles (\*see sources).

- Health burden: As analytic techniques become more robust, allowing more accurate evaluation of potential health impacts of nuclear energy generation - studies show that living in proximity to a nuclear power plant increases the incidence of a variety of cancers (\*\*see sources). According to one source, cancer deaths in the US attributable to residential proximity to nuclear power plants are estimated at 115,586 (95% confidence error range 56,964–173,326).

### **OPG must make some key decisions so the Impact Assessment can be conducted on an actual plan**

OPG has proposed to build the ‘world’s largest nuclear power plant’ - but the plan they have provided is no plan at all - it is ‘the concept of a plan’. Given the scope of this project, and the timelines involved, I request that IAAC push back on the PPE approach proposed, and demand that OPG re-submit their project proposal once they have done their due diligence and made a decision on the technology they plan to use. By asking that the IAAC and all concerned parties assess multiple nuclear technology options, OPG demonstrates that they have not completed sufficient analysis and is rushing the process. At minimum, they should be required to narrow the choice down to the top two. Not doing so imposes an unfair burden on everyone with an interest in the project. And, raises the question as to why the initial due diligence phases of this project are being rushed.

I look forward to having the opportunity to review the revised Integrated Tailored Impact Statement Guidelines.

### Select Sources

#### \* Cost of nuclear vs. alternatives

##### **Comparative Analysis of Electricity: Generation Costs by Source**

H368317-0000-21A-066-0001

2023 Report prepared by Hatch for WaterPower Canada with funding through the Ministry of Energy and Natural Resources of Canada.

##### **Canadian solar and wind project costs plummet: Renewables are now most affordable new generation, as costs are halved**

January 28, 2026, Pembina Institute

By David Pickup, Manager, Electricity and Will Noel, Senior Analyst

#### \*\* Health impacts of proximity to nuclear power plants

##### **National analysis of cancer mortality and proximity to nuclear power plants in the United States**

Nature Communications, 23 February 2026 Volume 17, Article number: 1560 (2026)

By Yazan Alwadi, Barrak Alahmad, Carolina L. Zilli Vieira, Philip J. Landrigan, David C. Christiani, Eric Garshick, Marco Kalfoten, Brent Coull, Joel Schwartz, John S. Evans & Petros Koutrakis

##### **Proximity to nuclear power plants associated with increased cancer mortality**

February 23, 2026 Harvard T.H. Chan School of Public Health

By Maya Brownstein