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Comments submitted in response to the invitation to comment on the Draft Tailored Impact Statement Guidelines for the New Nuclear at Wesleyville (NNW) project (IAAC Ref 89802)

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I wish to make it clear that these comments are made on my own behalf, and not on behalf of the Safecast.org radiation and environmental monitoring organization for which I volunteer my time and efforts. Although I intervened on behalf of Safecast in the Darlington Re-Licencing Hearing (June 2025) the following comments are my own.

Need for project is unclear

The Impact Assessment Act 22(1) requires the proponent's impact assessment statement to consider:

(d) the purpose of and need for the designated project;

> The Initial Project Description (IPD) does not make an adequate case for the need for the designated project. Who needs the power? Data centres? US States bordering Ontario? Or is there a genuine desire to actually decarbonize Ontario's energy supply.

(e) alternative means of carrying out the designated project that are technically and economically feasible, including through the use of best available technologies, and the effects of those means;

> The IPD jumps directly to building a nuclear generating station of pharaonic proportions without considering the impacts and relative costs of the project itself compared to renewables, power sharing with Hydro Québec (and possibly with Manitoba) and efficiency savings (a.k.a. generating nega-watts).

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

> This section narrows the scope of the assessment and seems more suited to a river crossing – bridge vs. ferry scenario – than a nuclear generating station intended to provide a significant portion of Ontario's electricity.

Wrong questions, narrowed scope

Section 2.8 “Project purpose, need and alternatives considered” is troublesome because it appears to accept the proponent’s assertion that there are no viable alternatives to building a colossal nuclear generating station. The scope of the assessment seems to have been purposefully narrowed such that the assertion appears reasonable at first reading. However, by widening the scope of the assessment, alternatives appear that may be less harmful to the environment, more beneficial in mitigating the effects of the climate crisis and less costly to the public purse.

Asking the right question always provides better answers. The IPD seems to be written to answer “How do we build a power generating station with capacity 10,000MWe?”. The answer then is obvious, it must be nuclear. If the question is instead “How do we provide 10,000MWe to satisfy future electricity demand?”, the alternatives of renewable energy (wind, solar, batteries) become viable, especially now that the technology is maturing and costs are dropping. By widening the question further, “How can Ontario (and Canada) meet future energy needs?”, we can now consider the many ways to budget our energy for transportation, heating and cooling, as well as for manufacturing and services. Finally, if we ask “How can Ontario (and Canada) best meet the challenges of the climate crisis?”, nuclear power may not be all that it is touted to be by the proponent OPG, the IESO and the Government of Ontario.

How do we provide 10,000MWe to satisfy future electricity demand?

The cost of solar and wind generation has dropped in recent years such that it is competitive in many places with fossil gas generation and with nuclear power, especially when factoring the entire project life cycle. The intermittent nature of wind and solar can be covered with grid-scale storage. The increase in behind-the-meter solar and batteries represents generation that is not accounted for in the Ontario day-to-day power demand figures yet alleviates some of the summertime peak demand. Exchange of power between Ontario and Québec can alleviate seasonal peak demand (summer in Ontario, winter in Québec). The existing power sharing agreement can be expanded and the additional transmission lines required to are far less costly than new generation assets.

How can Ontario (and Canada) meet future energy needs?

The supply of energy is not a goal in itself. What matters is the ability to do work, whether for transportation, providing goods and services, or heating and cooling. The focus then shifts to asking how we may best accomplish this work? In transportation, electric personal automobiles and trucks may not be the best way to move people and goods when electric rail can carry more at a lower costs, with construction timelines similar to that of nuclear reactors. If heating and cooling of buildings is the objective, can it be accomplished more efficiently with geothermal or air-source heat pumps?

In Draft Guidelines 2.8.3, the IAAC is accepting the proponent’s assertion 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.” Yet, in Draft Guidelines 2.8.2, the proponent “must describe the underlying opportunity or issue that the project intends to seize or solve from the perspective of the proponent”

and “provide a rationale that the project is a warranted response”. The issue stated in the IPD is the doubling of electricity demand between now and 2050 (150TWh to 300TWh) claimed in the Pathways report. This estimate has been challenged by industry observers and NGOs, arguing that there is a disconnect between the IESO planning and work done throughout Canada to address climate change. Critics of Ontario energy policy point to the long history of OPG and the predecessors to the IESO, Ontario Hydro and the Ontario Power Authority of justifying new nuclear with inflated demand growth projections.

The path chosen, large generation assets and transmission lines, is also challenged by a report commissioned by the IESO itself on the prospects of distributed energy resources (Ontario’s Distributed Energy Resources (DER) Potential Study (2022) Dunsky Energy + Climate). The report recommends increasing supply from distributed energy resources, but there is little mention of that in either “Pathways” or “Generations”.

How can Canada best meet the challenges of the climate crisis?

Asking this question gets at the heart of the necessary responses to the climate crisis and puts the focus on the competition for capital between renewables and nuclear. Choosing nuclear and its enormous demand for capital before a single watt of power is supplied starves distributed energy resources that can be built out gradually. The long construction timelines extend the need for fossil gas generation while the reactors are being built. In many ways, choosing nuclear delays meaningful action on the climate crisis and heightens the danger to populations in Canada and globally to weather related catastrophes.

The Process and the 10,000MWe loophole

In the assessment process, the IAAC, the proponent and, eventually, the joint review panel will engage with the public, First Nations and other stakeholders. If the scope of the assessment is narrowed down to considering only a nuclear generating station at Wesleyville, the assessment may appear to support a predetermined outcome. In the 2007-2008 Environmental Commissioner Ontario’s report “Getting to K(no)w”, commissioner Gord Miller cautions that the engagement must be sincere and that the outcome of the process could be a “No” to the project, or a significant modification. Otherwise, the consultation may appear performative and the individuals and organizations participating in the process could see the hopes for their input to alter the project dashed. This leads to a public mindset more distrustful of institutions – we already have enough of that! – but also to increased project costs and delays due to litigation or even civil disobedience.

The decision to undertake the construction and operation of the New Nuclear at Wesleyville has never been the subject of a society-wide debate in Ontario, instead supported by a sort of nuclear consensus established in the 1960s and 1970s. The decision was made by ministerial order without going through the Ontario Legislature, nor was it an issue in the any recent election campaign. The only formal venue available to the public to challenge a decision to build would be the Ontario Energy Board, which regulates fossil gas and electricity rates. However, the OEB is not an independent body. For example, the minister of energy and mines overturned a long standing rule by the Ontario Energy Board,

allowing OPG to add financing costs of the Darlington new nuclear and Pickering refurbishment to electricity rates before the projects are complete and generating power (Environment Registry of Ontario 025-0501 January 16, 2026).

The federal government has very little jurisdiction in matters of energy in Ontario, only regulating nuclear power generation and conducting this impact assessment. The Draft Guidelines section 2.8.3 make this clear, stating that the impact assessment "will not reassess provincial energy policy or determine the appropriate electricity generation mix for the province".

The federal-provincial jurisdiction split is the 10,000MWe loophole, effectively preventing the public from having a say on whether or not the project should proceed. Given this decision making structure, it is reasonable to question the value of a participant to engage in the process, and to wonder if the process itself is just a paper exercise.

Recommendations

The final Impact Assessment Statement Guidelines must require the proponent to

- Clearly address the need for the project, and review the demand growth assumptions presented in the IESO "Pathways to Decarbonization" report and the Government of Ontario "Energy for Generations". To do so would satisfy the Impact Assessment Act requirement to consider not only alternatives to the project, but the need for it in the first place.
- Provide credible alternatives to the project, specifically on how the projected demand could be satisfied by a mix of wind, solar, hydro, batteries, geothermal and other non-carbon energy sources.
- Examine the do-nothing scenario: what would happen if the project did not get built.
- Provide a realistic comparison of costs of nuclear vs. renewables. These costs present a risk to the project and, in the eventuality that the project is abandoned before completion, could leave the site in a damaged state, neither in its original or natural state, nor suitable for industrial or agricultural purposes.