

Blue Dot Northumberland

Submission to the Impact Assessment Agency of Canada

Re: Draft Integrated Tailored Impact Statement Guidelines for Ontario Power Generation's New Nuclear at Wesleyville Project

Submitted: May 7, 2026

Project: New Nuclear at Wesleyville Project, Reference No. 89802

Proponent: Ontario Power Generation Inc.

Subject: Need for and alternatives to the project; definition of affected/host communities

1. Summary of requested changes

The Impact Assessment Agency of Canada should revise the Draft Integrated Tailored Impact Statement Guidelines to require Ontario Power Generation to provide a full, evidence-based assessment of:

1. **The need for the project;**
2. **Alternatives to the project**, including non-nuclear and demand-side alternatives capable of meeting the stated need; and
3. **The socio-economic, infrastructure, public-health, emergency-planning and psychosocial effects on a broad regional host community**, not only the Municipality of Port Hope.

The current draft guidelines recognize that the proponent must identify the project's purpose and need, but then state that IAAC will rely on OPG's Initial Project Description as having demonstrated that there are no technically and economically feasible alternatives to the project, and that no further information on alternatives is required. ([IAAC](#)) That approach is inconsistent with both the Impact Assessment Act and the foundational role of alternatives analysis in environmental assessment.

2. Need for and alternatives to the project must be included

2.1 The Impact Assessment Act requires consideration of need and alternatives

The Impact Assessment Act is explicit. An impact assessment must consider “the purpose of and need for the designated project,” “alternative means of carrying out the designated project,” and “any alternatives to the designated project that are technically and economically feasible and are directly related to the designated project.” ([Laws and Regulations of Canada](#)) The Act also requires consideration of public comments and community knowledge. ([Laws and Regulations of Canada](#)).

These are not optional topics. They are statutory factors. A guideline that effectively encourages the removal of consideration of the need for alternatives to the project from the Impact Statement narrows the assessment before the evidence has been tested is inconsistent with the spirit and the letter of the Impact Assessment Act.

IAAC’s own policy guidance confirms that “need for,” “purpose of,” “alternatives to,” and “alternative means” should be considered early, before major project-design commitments are made, and that planning-stage information on alternatives is intended to inform the Tailored Impact Statement Guidelines. IAAC’s process overview further states that the Agency scopes alternatives-assessment requirements in the Tailored Impact Statement Guidelines and, where further assessment is required, provides direction to the proponent in those Guidelines.

That is precisely what should occur here.

2.2 Alternatives analysis is foundational to environmental assessment

Consideration of need and alternatives is not a procedural technicality. It is a foundation of credible environmental assessment because it asks the threshold question: **is this project necessary, and are there less damaging, lower-risk, faster, or more cost-effective ways to achieve the same public objective?**

Without that inquiry, environmental assessment is reduced to a mitigation exercise. It asks only how to reduce the effects of a preselected project, rather than whether those effects can be avoided in the first place. Avoidance is the first and most important step in the mitigation hierarchy. Where a project involves long-lived radioactive materials, large water withdrawals and discharges, major construction impacts, regional workforce influx, emergency-planning obligations, and intergenerational waste-management responsibilities, avoiding unnecessary risk is especially important.

A rigorous need-and-alternatives review also supports:

- **Public-interest decision-making:** Decision-makers cannot determine whether adverse effects are justified unless they know whether the project is actually needed and whether feasible alternatives exist.
- **Sustainability:** The Act requires consideration of the extent to which a project contributes to sustainability. A project cannot be meaningfully assessed for sustainability without comparison to alternatives that may deliver the same energy services with lower cost, lower risk, lower ecological disturbance, and shorter implementation time.
- **Public confidence:** The Agency has invited public input to shape the assessment. Consideration of both the need for and alternatives to the project were raised by hundreds of the submissions to the IAA in response to the draft guidelines, and ranked by far as the number one and two issues raised in that round. If the leading public concerns are excluded from the proponent's required studies, the process will appear predetermined.
- **Intergenerational fairness:** A nuclear plant proposed to operate for many decades, with associated radioactive waste-management obligations, creates long-term commitments. Such commitments should not be made without testing whether the underlying need can be met by alternatives with lower long-term liabilities.

2.3 The need case requires heightened scrutiny because the proponent is a public-sector entity

All proponents before environmental assessment reviews believe their proposal is needed. The testing of that position should be tested especially rigorously when the proponent is a public-sector entity advancing a project at the direction of government energy policy, not a private developer risking its own capital in a competitive market. Public-sector proponents can play important roles, but they are not subject to the same market discipline as private proponents. The risk of overbuilding, cost socialization, optimistic load forecasting, and weak consideration of non-build alternatives is therefore materially higher than with private sector proponents.

The consequences of an inaccurate need case would be borne not by the proponent alone, but by ratepayers, taxpayers, host and neighbouring communities, Indigenous communities, and future generations. This makes independent scrutiny of the asserted need indispensable.

This concern is not hypothetical; Ontario's electricity planning history includes major over-forecasts of demand dating back decades. Ontario Power Generation (and its earlier incarnation Ontario Hydro) has a long history of bringing proposals forward for approval before public tribunals including environmental assessment boards, only to withdraw them when it became apparent that the need for and alternatives to the proposed facilities had not been adequately considered at the outset.¹ That history strongly supports a requirement that OPG's need case be independently tested in this assessment, rather than accepted as a policy premise.

¹ See <https://corporateknights.com/energy/ontario-reckless-nuclear-expansion-gamble/>

2.4 Economic conditions have changed and alternatives must be revisited

Since the Wesleyville proposal was first advanced, the economics of electricity supply alternatives have continued to shift. Recent Ontario procurement results show that the Independent Electricity System Operator offered 20-year contracts to 14 new renewable energy projects through the LT2 energy stream. ([IESO](#)) Lazard's 2025 Levelized Cost of Energy+ report also states that renewables remain among the most cost-competitive forms of generation and emphasizes their role in a high-demand environment because they are relatively low-cost and quick to deploy. (<https://lazard.com>)

These developments do not predetermine the outcome of an alternatives assessment. They do, however, make it unreasonable for the Guidelines to conclude at the outset that no technically and economically feasible alternatives need be studied.

The Guidelines should require OPG to compare the Wesleyville nuclear project against portfolios capable of meeting the same stated energy-service need, including combinations of:

- energy efficiency and demand response;
- wind and solar generation;
- energy storage;
- transmission upgrades and regional interties;
- distributed energy resources;
- refurbishment or life-extension options, where relevant;
- procurement portfolios that combine firm capacity, clean energy, and demand-side resources.

The comparison should include cost, schedule, reliability contribution, emissions, land and water impacts, waste liabilities, accident and security risks, infrastructure requirements, workforce requirements, and ratepayer/taxpayer exposure.

2.5 Public comments have already identified need and alternatives as central issues

IAAC's Summary of Issues records concerns about "project need and alternatives to the proposed project, particularly in the consideration of nuclear power compared to renewable energy sources," as well as concerns about ratepayer impacts, electricity rates, taxes, and the cost of nuclear compared with cheaper alternatives. ([IAAC](#)) The public registry also shows numerous submissions specifically asking IAAC to require assessment of energy efficiency, renewables, storage, and other alternatives. ([IAAC](#))

The Draft Guidelines nevertheless state that IAAC will rely on OPG's Initial Project Description to conclude that no alternatives to the project need further assessment. ([IAAC](#)) That is the wrong response to the public record. Where the public has identified need and alternatives as central

concerns, the Guidelines should require the proponent to address those concerns directly in the Impact Statement.

3. The “host community” must be defined regionally, not limited to Port Hope

The second necessary revision concerns the geographic and social scope of the assessment. The project is located in the Municipality of Port Hope, but its socio-economic, infrastructure, emergency-planning, public-health, psychosocial, and cumulative effects will extend far beyond the Port Hope boundary.

The Draft Guidelines already acknowledge that health, social and economic conditions must be assessed for individuals and broad populations living in the project study area, and that the assessment must collect baseline information, analyze effects, and identify mitigation measures for affected communities. (IAAC) They also state that OPG should work with, at minimum, Cobourg, Port Hope, Trent Hills, Brighton, Hamilton Township, Alnwick/Haldimand, Cramahe and other self-identifying local communities. (IAAC) This regional framing should be made clearer and stronger.

The Guidelines should expressly instruct OPG that the local/regional study areas should include communities likely to experience:

- housing and rental-market pressure from construction and operations workforces;
- demand on healthcare, schools, emergency services, water, wastewater, roads, and other infrastructure;
- traffic, construction, noise, air-quality, and visual impacts;
- emergency-planning and evacuation implications;
- perceived or actual contamination risks affecting agriculture, tourism, recreation, food systems, and mental well-being;
- cumulative effects from existing nuclear and radiological facilities in the region.

IAAC’s Summary of Issues identifies concerns about housing availability, increased rental and housing prices, workforce influx, regional infrastructure and service strain, emergency services, healthcare, schools, water, wastewater, transportation, private wells, transmission infrastructure, and cumulative effects on local and regional populations. (IAAC) These are regional impacts by nature.

The Guidelines should therefore require OPG to justify the boundaries of its local and regional study areas using evidence of likely effect pathways, not municipal convenience. OPG should also be required to consult neighbouring municipalities and self-identifying affected communities on whether the proposed study areas capture the actual social, economic, infrastructure and health-risk geography of the project.

4. Requested revisions to the Guidelines

IAAC should revise section 2.8.3 of the Draft Guidelines to remove the statement that no additional information on alternatives is required. In its place, IAAC should instruct OPG to provide a full alternatives-to assessment.

Suggested replacement wording:

Alternatives to the project

The Impact Statement must assess technically and economically feasible alternatives to the project that are directly related to the project's stated purpose and need. The assessment must not be limited to nuclear-generation alternatives or to alternatives preferred in provincial electricity policy. It must include non-nuclear supply-side, demand-side, storage, transmission, procurement, and portfolio alternatives capable of meeting the same stated electricity-service need, and the stated electricity-service need itself must be thoroughly analyzed and supported.

For each alternative, the proponent must assess, at minimum: cost and ratepayer/taxpayer exposure; implementation schedule; reliability and capacity contribution; greenhouse gas emissions; land, water and biodiversity effects; health, social and economic effects; Indigenous rights and interests; waste-management liabilities; accident, malfunction and security risks; cumulative effects; and consistency with sustainability and climate commitments.

The proponent must explain why each alternative was accepted or rejected, identify uncertainties, and provide sensitivity analysis for demand forecasts, capital cost, construction schedule, financing cost, technology performance, and electricity-system assumptions.

Suggested addition to section 6:

Regional host-community assessment

The Impact Statement must define the host community and local and regional study areas based on likely effect pathways, including socio-economic, infrastructure, public-health, psychosocial, emergency-planning and cumulative-effect pathways. The host community must not be presumed to be limited to the Municipality of Port Hope. The proponent must assess effects on Port Hope, neighbouring municipalities, First Nations and other Indigenous communities, and other self-identifying local or regional communities that may experience project-related effects.

The proponent must justify the spatial boundaries selected for each health, social, economic, infrastructure, emergency-planning and cumulative-effects assessment, and must explain how input from affected municipalities, Indigenous communities and local peoples informed those boundaries.

5. Conclusion

The Wesleyville proposal is not an ordinary project. It is a potential 10,000 MW nuclear generating station, proposed to operate for many decades, with region-wide implications for public infrastructure, health, emergency planning, land and water use, radioactive waste, electricity costs, and intergenerational risk. ([IAAC](#))

For a project of this scale, IAAC should not accept the proponent's assertion that alternatives need not be assessed. The final Guidelines should require OPG to demonstrate the need for the project and to compare it against credible alternatives. They should also require OPG to assess a broad impact area, reflecting the actual geography of likely effects.

These changes are necessary to satisfy the Impact Assessment Act, respond to public concerns, and preserve the integrity of the federal impact assessment process.