

Comments on the *New Nuclear at Wesleyville Project (89802)*  
*Draft Integrated Tailored Impact Statement Guidelines*

By Ecological Justice Working Group of the Justice, Mission and Outreach  
Committee, Regions East, United Church of Canada

Submitted to The Impact Assessment Agency Canada (IAAC) May 7, 2026

Contact: Mary Lou Harley, Ph.D.

Thank you for the opportunity to comment on the *Draft Integrated Tailored Impact Statement Guidelines* of the *New Nuclear at Wesleyville Project*, in Port Hope.

The United Church of Canada has a long history of policies, documents, and submissions to public calls for input on social, environmental and ethical issues relating to energy issues and climate change. This submission is grounded in that extensive base of information including the foundational policy, *Energy in the One Earth Community- Current Challenges and Future Options for Energy Use in Canadian and Global Contexts (2000)*<sup>1</sup>.

The United Church has acknowledged the harmful role that past false assumptions of human separation from and superiority over the natural world has had in the commodification of nature and environmental destruction. In its policies supporting this submission, the United Church has articulated humanity's fundamental integration with the rest of creation along with a call towards responsibility for the care of creation. Further, the United Church notes that such crucial understandings are at the root of the richness and wisdom of Indigenous worldviews and draws your attention to the importance of that wisdom in this assessment process.

A Way that is Ethical and Respectful

In Section 1. of the *Summary Draft Integrated Impact Guidelines*, IAAC notes that *Introduction Instructions to Ontario Power Generation include:*

- *Prepare the Impact Statement in a way that is ethical and respectful.*

However, this project assessment is failing in some respects to proceed in a way that is ethical and respectful.

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<sup>1</sup>United Church of Canada. Social Policy. *Energy in the One Earth Community*. August 29, 2000.  
<https://generalcouncil.ca/document/energy-one-earth-community>

From the outset, the matter of environmental injustice is relevant to this Project. It is perturbing that yet another nuclear project is proposed for this area and its communities that have suffered since the 1940s from radioactive emissions and grossly mismanaged nuclear wastes that continue to impact the people and ecosystems.

This project is a huge nuclear station to be built in an agricultural area of these communities. The size and complexity is beyond what has been done in a single location anywhere to date. Yet the IPD presents a potential 10,000 MWe nuclear generation station, with independent nuclear reactors of unknown number and uncertain design, and facilities for nuclear wastes with important details unknown and alternatives still under consideration for the on-site storage of irradiated fuel (the most dangerous waste product), which would require additional consideration within the overall impact assessment process.

Given the history of the area and present situation with other nuclear issues, an ethical and respectful process would require that the proponent bring a project of this magnitude forward with primary planning decisions made, robust descriptions of the project components and activities throughout each phase of the project and access to relevant reliable information in approachable formats that facilitate meaningful public participation in the process. Such a process is required and it is not the process underway for the New Nuclear Wesleyville Project.

In our Group's comments on the IPD, the conclusion was that

- this project has been brought into the assessment process too early, with insufficient planning.

We further conclude from our review of the DITISG that

- the requirements outlined in the DITISG are insufficient to address the fundamental inadequacies of the project as proposed.

While the project description does not provide fundamental information to support an impact assessment and the requirements in the Draft Integrated Tailored Impact Statement Guidelines do not address the deficits, the need to help decarbonize Ontario's grid and meet growing energy needs can be met by solar and wind projects that are meeting high production requirements. For example, recent results under IESO, Resource Acquisition and Contracts, update on Long Term 2 RFP<sup>2</sup> reports that solar and wind projects met "a total of 1,315.10 MW of Contract Capacity and an aggregate Expected Annual Imputed Production of 3.02 TWh," indicative of the role of these energy sources in meeting energy needs forecasted to emerge in the 2030s.

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<sup>2</sup> <https://www.ieso.ca/Sector-Participants/Resource-Acquisition-and-Contracts/Long-Term-2-RFP>

If this project assessment is to continue in an ethical and respectful process,

- the IAAC needs to submit a revised Draft Integrated Tailored Impact Statement Guidelines;
- the IAAC must require that the proponent provide fundamental decisions and related information, including selection of the final type of nuclear reactor and cooling system technologies;
- the IAAC must require the proponent to conduct a thorough analysis of the need for this project, the alternatives to the project and alternative means of carrying out the project; and
- the IAAC must require that the proponent provide a credible analysis of the cumulative effects of the project and the impacts of potential malfunctions and incidents.

## Appendix

The 12 ethical principles of *One Earth Community: Ethical Principles for Environment and Development* served as a foundation for the work by our Ecological Justice Working Group.

The United Church brought the growing theological reflection on living with respect in Creation together in the policy statement, *One Earth Community: Ethical Principles for Environment and Development* adopted in 1992 by the 33rd General Council. In this policy, the statement of 12 ethical principles is a framework which seeks to include environmental, social and economic justice considerations, and personal, corporate, and governance responsibilities in environment and development issues:

1. *Human societies must bear a responsibility toward the Earth in its wholeness.*
- 2 *To be both people-oriented and ecologically-sound, all development strategies must be founded on a just international economic order, with priority for the world's poor.*
3. *Lifestyles of high material consumption must yield to the provision of greater sufficiency for all.*
4. *Environmental destruction must stop and humanity must understand itself collectively responsible both for the destruction and for the repair thereof.*
5. *The rights of future generations must be protected.*
6. *The carrying capacity of the Earth, regionally and globally, must become a criterion in assessing economic development.*

7. *The bio-diversity of the Earth must be respected and protected.*
8. *Militarism must yield to non-violent approaches to conflict resolution.*
9. *Decision-making for just and ecologically-sound development must ensure the participation of individuals and groups, especially those most affected by the project.*
10. *Both opportunities for learning and access to knowledge must be assured in order to facilitate sustainable development.*
11. *Development decisions must emphasize prevention of ecological damage.*
12. *Procedures and mechanisms must be established ensuring a transnational approach to environmental issues and disputes.*

The 37th General Council in 2000 adopted the comprehensive energy policy statement, *Energy in the One Earth Community*, founded on those 12 principles.

*Energy in the One Earth Community* begins with theological and ethical reflections on energy within the Canadian and global contexts, and continues with a more specific discussion of current challenges and future options related to a range of energy sources. The resolution includes recommendations for government, industry, church and individuals.

*Energy in the One Earth Community* states in part:

*Energy policy in Canada should be based on ethical principles of respect for and justice within the One Earth Community, and should shift away from the strategy of expanding supply through energy mega-projects and focus more on managing demand and development of renewable, alternative sources. Specifically, Canada should:*

[multiple recommendations related to various energy forms including the following]

*-reduce our reliance on nuclear power, a technology which entails a level of risk many find unacceptable and for which there are still unresolved problems such as the safe disposal (or safe storage) of high level wastes of nuclear reactors;*

*- a moratorium should be instituted on the expansion of existing facilities and/or the establishment of new nuclear facilities or uranium mines, such moratorium to extend to the disruption of radioactive deposits and the export of nuclear technology and materials;*

*- in terms of nuclear waste management and disposal, the government should ensure that the full set of options for approaches to nuclear waste management are adequately explored in an open and transparent process with the necessary expertise in social and environmental science and in ethics. Any waste management agency that is set up should operate at arm's length from both the utilities and AECL, with a board and advisory council having broad representation.*