



nuclear
transparency
project

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Submitted via email

May 7, 2026

To the Impact Assessment Agency decision-makers,

Re: draft Integrated Tailored Impact Statement Guidelines and draft Public Participation Plan for the New Nuclear at Wesleyville Project

These comments relate to the draft Integrated Tailored Impact Statement Guidelines and draft Public Participation Plan for the New Nuclear at Wesleyville Project. This project involves a proposal by Ontario Power Generation (OPG) to construct (an as yet unspecified number of) new nuclear reactors, along with supporting infrastructure, in Port Hope. While the draft Integrated Tailored Impact Statement Guidelines are fairly comprehensive, we identify some areas where additional factors would ensure a more comprehensive project assessment. These comments also include some concrete suggestions for improving public engagement plans. Finally, we also make several recommendations relating to the current regulatory process for public interventions. But first, we will briefly describe our organization and our interest in the current comment opportunity.

About NTP

The Nuclear Transparency Project (NTP) is a Canadian-registered not-for-profit organization dedicated to supporting open, informed, and equitable public discourse on nuclear technologies. NTP advocates for robust public access to data and other types of information and helps to produce accessible analysis of publicly available information, all with a view to supporting greater transparency in the Canadian nuclear sector. NTP is comprised of a multi-disciplinary group of experts who work to examine the economic, ecological, and social facets and impacts of Canadian nuclear energy production. We are committed to interdisciplinary, cross-sectoral, and equitable collaborations and dialogue between regulators, industry, Indigenous nations and communities, civil society, members of host and potential host communities, and academics from a variety of disciplines.

Historically, much existing Canadian nuclear infrastructure was approved by regulators without requiring consultation with, or permission from, Indigenous Peoples. Opportunities for public interventions were limited, if offered at all. And facilities were approved without requiring solid plans for permanent waste management. Operating against this troubling legacy, proposals to construct new nuclear facilities must be held to a much higher standard. A comprehensive, fair, accessible, and transparent regulatory review procedure is crucial. It is on this basis that NTP offers the comments that follow.

Substantive comments on the draft Integrated Tailored Impact Statement Guidelines

NTP submits the following four points:

1. Ensuring transparency when employing plant parameter envelope approach

OPG is proposing a major new nuclear project, but depending so heavily on a plant parameter envelope (PPE) approach introduces many uncertainties. From a transparency perspective, the more detailed and specific a project proposal, the better. PPEs by definition fail to provide this specificity. While we appreciate the outlines for determining PPE content already in the guidelines, we would also like to request the following: for each reactor technology considered, exact discharges to air and water should be disclosed. The public must be informed of, and be able to comment on, exactly what radiological and non-radiological substances may be released, in what concentrations, and what quantities. Further, for any cooling water infrastructure, the exact dimensions of any lake intakes, fish barriers, and flow rates must be disclosed.

2. Ensuring Valued Components are comprehensive and representative

Identified Valued Components should include specific species at all trophic levels in recognition on the complexity of the ecosystem in which the proposed project site is situated. Rationales for any selection and assessment of 'representative species' should be clear and take into account Indigenous intervenors' positions on this methodological issue. Finally, any use of "surrogate species" to stand in for classes of species should comply with the guidance provided in: Caro T. M., O'Doherty G. (1999). On the use of surrogate species in conservation biology. *Conserv. Biol.* 13, 805–814. doi: 10.1046/j.1523-1739.1999.98338.x

3. Employing an environmental justice approach to project impacts

While the draft Integrated Tailored Impact Statement Guidelines discuss social and economic impacts of the project, there is no explicit discussion of historical factors specific to the proposed project location. Nor is there any explicit requirement for OPG to address issues of environmental justice or environmental racism in their Impact Statement. NTP recommends that the project impacts (identified benefits, risks, and adverse effects) should be discussed with reference to existing inequalities relating to the benefits and harms of existing industrial development in the region.

NTP recognizes the sovereignty and jurisdiction of the Indigenous Peoples whose lands and waters stand to be impacted by this project proposal. We support their interventions in this matter and recognize them as relevant decision-makers when determining allowable activities by nuclear industry in their territories. NTP also recognizes the applicability of Indigenous laws as part of these nations' governance systems of their homelands on which these facilities operate.

In addition, we recognize that legacy contamination issues from historical nuclear fuel processing activities have persisted in Port Hope for decades. Current remediation efforts, long overdue, are costing billions in public funding while simultaneously exhibiting a lack of transparency with regard to the selection of clean-up locations, clean-up criteria, and their public communication.

Properly contextualizing the current new nuclear project proposal within this larger context is essential. Failing to do so would threaten to perpetuate very serious inequities in this region.

4. Sustainability considerations in OPG's decommissioning plan

We would like to propose that considerations of sustainability more explicitly include how sustainability factors inform OPG's proposed facility design and decommissioning in mind. More specifically, OPG should explain how initial designs and proposed construction materials may take into account the environmental and economic footprint of the facility's eventual decommissioning.

Substantive comments on the draft Public Participation Plan

NTP submits the following three points:

1. Designated project contacts

The impact statement and environmental assessment should include an email address or contact information for a designated OPG representative responsible for fielding any questions or document requests from intervenors or members of the public.

2. Access to information

All documents referenced in the final impact statement should be made proactively available online at the same time the impact statement is made available. The same should be required for the environmental assessment: all external documents it references should be made available online at the same time the assessment itself is made available. Further, if non-document sources such as data sets are referenced in the impact statement or environmental assessment, this data should be proactively publicly

disclosed in full. This would assist intervenors with their research in the limited comment time available.

Each reference should be made available as a separate downloadable file. In the past, project proponents have posted numerous appendices to support their applications in a single amalgamated file. The resulting file can be thousands of pages long. For intervenors with older or otherwise less powerful computers, such large documents can be difficult if not impossible to open, let alone navigate. While some may prefer a single amalgamated document for all references, we request the option of separate downloadable files for those who would require it.

NTP supports requiring machine-readable and accessible electronic formats for materials as well as electronic geospatial data files for information provided in maps. This would considerably assist intervenors' analysis of these types of materials.

3. Public engagement over environmental monitoring plans

OPG should share full draft versions of its proposed environmental follow up monitoring plans for public comment rather than high-level descriptions of plans. We understand plans may change over time, especially as a project progresses. However, early and sustained public engagement necessitates as much information as possible being shared as early as possible, with the understanding that feedback can continue as plans change over time.

OPG should also outline measures to ensure the results of routine sampling and environmental assessment follow-up sampling would be made proactively publicly available, should the project be approved. Further, OPG should permit public input relating to monitoring methodologies including the determination of contaminant parameters, sampling locations, and frequencies.

Procedural comments related to the current regulatory review

We understand that many of the timeframes in this review are already determined by federal legislation. However, wherever flexibility is possible, we submit the following:

1. Time frames for public comments could be at least two months (rather than one) to allow for information requests between intervenors and project proponents. This would enable more informed and specific (and thus useful and actionable) interventions;
2. Participant funding decisions should be provided in advance of the review process to support the work required to review initial project descriptions and prepare substantive comments relating to the list of issues to guide consideration of project proposals;
3. The time frames for participant funding applications should be at least two months to allow for interested members of the public and civil society organizations to

create the necessary workplans and make inquiries with potential third-party experts as required; and

4. All notices (whether sent by the IAA, CNSC, or project proponents) should clearly communicate timeframes for public comment and participant funding.