

PUBLIC PARTICIPATION PLAN

OSPE RESPONSE

New Nuclear at Wesleyville (NNW) Project | July 2026

OPENING STATEMENT

The Ontario Society of Professional Engineers (OSPE) welcomes the opportunity to comment on the Public Participation Plan (the Plan) for the integrated assessment of the New Nuclear at Wesleyville (NNW) Project. OSPE is the province's only independent, not-for-profit membership organization representing the engineering profession, with a distribution network reaching over 40,000 engineers across Ontario. Our mandate is to advance the public interest through evidence-based advocacy on matters of engineering, energy, public safety, and environmental stewardship.

OSPE has been actively engaged in the NNW Project assessment process since the Initial Project Description stage. Our comments on the Plan are informed by that ongoing engagement and by the engineering profession's commitment to transparent, technically rigorous, and publicly accountable infrastructure decision-making.

The Plan is procedurally sound and reflects IAAC's established approach to public participation under the Impact Assessment Act. OSPE's observations focus on areas where the Plan, as currently drafted, could be strengthened to better serve the objectives it sets for itself: meaningful, early, and informed participation across all five phases of the integrated assessment. Our comments are offered constructively and in recognition that the Plan is explicitly designed to be flexible and adaptive.

OSPE respectfully requests that IAAC consider the observations set out in this submission. We remain available to discuss any aspect of our feedback and to provide further input as the assessment proceeds.

GENERAL OBSERVATIONS

Before turning to section-specific comments, OSPE offers one observation that applies across the Plan as a whole. Several commitments in the Plan are framed as contingent on request rather than proactive: the technical working group is established "as requested"; presentations to municipal councils are provided "as requested"; additional information sessions are held "as requested." For a project that has already generated significant public interest during the planning phase, and that will be assessed over many years, OSPE recommends that IAAC shift the default posture from reactive to proactive wherever feasible. The public interest in this project is not in question. Building engagement infrastructure early, and maintaining it consistently, will serve the Plan's own objectives better than responding to requests after gaps become apparent.

SECTION 3 — OBJECTIVES OF PUBLIC PARTICIPATION

The objectives are clearly stated and reflect good practice. OSPE draws attention to one: the commitment that public and local municipalities' views "are tracked, meaningfully considered and inform decision-making." This is an important commitment but the Plan does not describe the mechanism by which tracking and meaningful consideration will be demonstrated to participants. The What We Heard report referenced in Phase 1 is one such mechanism, but it is only explicitly committed to for the Planning phase.

OSPE RECOMMENDS

IAAC commit to publishing What We Heard summaries at the close of each phase of the integrated assessment, not only Phase 1, so that participants can verify their input was received and considered before the process moves to the next stage.

SECTION 4 — IDENTIFICATION OF PARTICIPANTS

The Plan invites all individuals, local municipalities, groups and organizations with an interest in the assessment to participate. The language is appropriately inclusive.

OSPE notes that the engineering profession is not explicitly identified as a participant category, though licensed Professional Engineers, geotechnical engineers, hydrogeologists, and nuclear engineers have directly relevant technical expertise for a project of this nature.

Public hearings on a project of this technical complexity will benefit from structured technical input from parties other than the proponent and federal authorities. Community organizations that retain independent engineering expertise, and professional associations that can mobilize technical commentary on the Impact Statement, represent a distinct and valuable category of participant.

OSPE RECOMMENDS

IAAC's outreach during Phase 2 specifically target professional engineering associations, licensed geotechnical engineers, hydrogeologists, and nuclear engineers as a participant category, and that participant funding eligibility explicitly include the costs of retaining independent technical experts by community organizations and local municipalities.

SECTION 6 — ACTIVITIES AND PUBLIC PARTICIPATION APPROACH

Phase 1 — Planning

The completed activities listed for Phase 1 are comprehensive and reflect genuine early engagement. OSPE participated in the comment period and subsequent engagement opportunities and notes that IAAC's responsiveness during this phase has been appropriate.

OSPE notes that the What We Heard report and Planning Phase Questions and Answers document are committed to be published "no later than six months after the close of the Planning Phase." Given that the Planning Phase closed on July 10, 2026 with the posting of the Notice of Commencement, this document is

due no later than January 10, 2027. OSPE encourages IAAC to publish this document as early as possible within that window to support continuity of engagement as Phase 2 begins.

**OSPE
RECOMMENDS**

The What We Heard report and Planning Phase Q&A document be published as early as practicable within the six-month window, and that the document clearly identify which OSPE and public submissions influenced which changes to the Integrated Guidelines and the Public Participation Plan.

Phase 2 — Impact Statement

The Phase 2 activities are well-structured. OSPE draws attention to two gaps.

First, the technical working group between IAAC, CNSC, and local municipalities is described as being established “as requested.” Given the documented concerns from local municipalities about infrastructure capacity, emergency management, socioeconomic effects, and cumulative effects, OSPE considers it likely that such a working group will be needed. Waiting for a formal request places the administrative burden on municipalities and community organizations that may not have the capacity or procedural familiarity to initiate one.

Second, the Plan commits to information sessions to explain the process and provide an opportunity to comment on the Summary of the Impact Statement. The Impact Statement for a project of this scale and technical complexity will be a large and specialized document. A single comment period on its summary, without structured technical support for participants reviewing it, may not be sufficient to generate the quality of public input the review panel will need to conduct a rigorous assessment.

**OSPE
RECOMMENDS**

*(1) The technical working group with local municipalities be established proactively at the outset of Phase 2 with a standing meeting schedule, rather than on request; and
(2) IAAC consider structured technical briefings or annotated plain language summaries of key Impact Statement sections, particularly those covering hydrogeology, aquatic environment, health risk, and emergency preparedness, to support meaningful public comment.*

Phase 3 — Impact Assessment

The Impact Assessment phase is led by the review panel, and the Plan appropriately defers to the panel’s Terms of Reference on the specific design of hearing procedures. OSPE supports the commitment that the review panel will hold “meaningful and accessible public hearing sessions in the communities most likely to be affected by the project.”

OSPE invites IAAC to consider whether the hearing process should include a dedicated session or standing opportunity for technically qualified third parties, including engineering associations and independent experts retained by community groups, to present technical commentary on specific sections of the Impact Statement. In OSPE’s experience, public hearings on major infrastructure projects benefit from structured technical intervenor participation that is distinct from general public comment, as it provides the review panel with independent verification of proponent claims on technical matters.

**OSPE INVITES
IAAC TO
CONSIDER**

Whether the review panel's Terms of Reference should include provision for structured technical intervenor participation, distinct from general public comment, to ensure the panel has access to independent technical expertise on specialized aspects of the Impact Statement.

Phase 4 — Decision Making

The Plan states that there will be no engagement activities during the Decision Making phase, which is consistent with the IAA framework and legally appropriate. However, the Plan is silent on the expected duration of this phase between the review panel's report and the Governor in Council decision. For participants who have been engaged over multiple years, the absence of any indication of timeline may create uncertainty and disengagement.

**OSPE
RECOMMENDS**

The Plan include a reference to the statutory time limits that apply to the Decision Making phase under the IAA, so participants have realistic expectations about the duration of this phase and can plan their continued engagement accordingly.

Phase 5 — Post-Decision

The transfer of engagement lead from IAAC to the CNSC following a positive decision is appropriate and consistent with the regulatory framework. OSPE notes one gap: the transition is described in terms of regulatory process milestones rather than in terms of what participants can expect in practice. A participant who has engaged actively through four phases of the integrated assessment should not have to re-register or re-identify themselves to participate in subsequent CNSC licensing proceedings. The continuity of the public record and participant list across the IAAC-to-CNSC transition is not addressed in the Plan.

**OSPE
RECOMMENDS**

The Plan describe how participants who have registered with IAAC during the integrated assessment will be notified of the transition to CNSC oversight, and how their participation status and contact information will be carried forward into CNSC processes, so that engagement continuity is maintained without placing an administrative burden on participants to re-register.

SECTION 7 — PARTICIPANT FUNDING

The commitment to participant funding across the integrated assessment and into post-decision CNSC processes is welcome. OSPE notes that the Plan does not describe the criteria or quantum of funding available, nor does it confirm whether funding covers the cost of retaining independent technical experts retained by community groups and local municipalities.

For a project of this technical complexity, community organizations that wish to retain independent engineering, hydrogeological, or nuclear safety expertise to review the Impact Statement will require meaningful funding to do so. The cost of retaining a qualified Professional Engineer to review, for example, the hydrogeological conceptual model or the human health risk assessment, is materially different from the cost of attending an information session. If participant funding is not scaled to cover expert review costs, it will

be functionally unavailable to the participants who most need it to engage substantively with the technical content of the Impact Statement.

**OSPE
RECOMMENDS**

IAAC confirm publicly, in its next update to the Plan or in a separate funding guidance document, whether participant funding eligibility includes the costs of retaining independent technical experts, and at what level of support, so that community organizations can make informed decisions about how to participate.

APPENDIX — VIEWING CENTRES

The list of viewing centres in Appendix 1 is geographically appropriate for the communities most directly affected by the project. OSPE notes that none of the viewing centres appear to be located in Peterborough, despite Peterborough County and the City of Peterborough being listed in the glossary as local municipalities for this assessment. Peterborough is also in closer proximity to several MS-WTFNs communities than some of the locations currently listed.

**OSPE
RECOMMENDS**

IAAC consider adding at least one viewing centre location in Peterborough to ensure that residents of Peterborough County and City, and those who travel through Peterborough to access services, have convenient access to key documents in the public record.