

Date: March 26th, 2026

Attention: The Honourable Julie Aviva Dabrusin, Minister of Environment and Climate Change

Re: Call for full Impact Assessment (IA) of the Planned Decommissioning of the Gentilly-1 Waste Facility- Reference Number 90092

Dear Minister Dabrusin,

The National Council of Women of Canada (NCWC) has long maintained strong precautionary policies concerning the life-cycle impacts of nuclear energy on the environment, as well as on public and worker health and safety. Our organization has also acted as an intervenor in numerous federal and provincial nuclear regulatory hearings.

At this time, we wish to draw your attention to our support for Dr. Gordon Edwards, President of the Canadian Coalition for Nuclear Responsibility (CCNR), in his formal request that the proposed demolition of the Gentilly-1 CANDU nuclear reactor by Canadian Nuclear Laboratories (CNL) be designated as a project subject to a full panel review under the Impact Assessment Act. [Reference: www.ccnr.org/IAAC_CCNR_G1_2026.pdf]

Given the magnitude and precedent-setting nature of this project, we respectfully submit that such a designation is both necessary and prudent. Unlike other nuclear projects that will automatically be subject to the Act's full review process, the potential risks associated with dismantling and crushing the reactor's highly radioactive materials pose immediate and serious concerns. NCWC is particularly alarmed by the potential health risks to the workers involved in demolition activities. Dr. Edwards has noted that during the 2009 refurbishment of the Bruce Nuclear Generating Station, more than 500 tradespeople experienced bodily contamination by inhaling radioactive dust containing plutonium and other alpha emitters, after being advised that respirators were unnecessary [ibid., p.1].

We are also deeply concerned that the grinding and blasting of the heavily contaminated structural components of Gentilly-1 may only be partially controlled, necessitating the careful packaging, storage, and transport of numerous dangerous radioactive fragments. It has further come to public attention that radioactive waste from Gentilly-1 has already been transported to Chalk River for storage on First Nations territory without prior knowledge or consent, which would be inconsistent with the Government of Canada's

obligations under the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and its duty to consult [ibid., p.2].

The NCWC strongly believes that a full panel review under the Impact Assessment Act would ensure the level of due diligence, transparency, and consultation warranted by this precedent-setting project. We are confident that such a review would best serve the long-term interests of environmental protection, public health, and the Government of Canada's treaty and reconciliation obligations with Indigenous peoples.

We therefore respectfully urge you, Minister, to ensure that this first full demolition of a CANDU nuclear reactor proceeds under a comprehensive and independent assessment process, in alignment with Canada's highest standards of environmental governance and precaution.

Respectfully,

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c.c.: The Hon Tim Hodgson Minister of Energy
The Canadian Nuclear Safety Commission
The Canadian Nuclear Laboratory

Mission Statement:

To empower all women to work together towards improving the quality of life for women, families, and society through a forum of member organizations and individuals.

*National Council of Women of Canada
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