



Project # 88774: COMMENTS ON THE CANADA IMPACT ASSESSMENT AGENCY (IAA) DRAFT GUIDELINES: THE NUCLEAR WASTE MANAGEMENT (NWMO) IMPACT STATEMENT FOR DEEP GEOLOGICAL NUCLEAR WASTE REPOSITORY

May 9th, 2026

Attn: IMPACT ASSESSMENT AGENCY

The National Council of Women of Canada (NCWC), as evidenced in its January 14, 2026 comments on the Nuclear Waste Management Organization's (NWMO) "Initial Project Description" [link], remains deeply concerned by the proposal to establish a Deep Geological Waste Repository for the receipt, burial, and long-term storage of all of Canada's high-level radioactive waste in rural Northern Ontario, far removed from the existing sources of such waste in and near Toronto, at Chalk River in Ottawa, and at the Bruce site near Kincardine.

It is noteworthy that, should the selected IAA hearing panel approve NWMO's proposal, the project would be regarded as an international model notwithstanding substantial public, scientific, and organizational opposition across Canada, as well as more than 600 submissions to the original NWMO application. Those submissions identified a number of serious deficiencies, with the potential to adversely affect the environment, public and worker health and welfare, and community safety and well-being for an indefinite period.

Accordingly, NCWC requests that NWMO's impact statement provide full, substantive, and properly documented detail regarding each precautionary component of its plan, with particular emphasis on the widely recognized need to treat transportation as a central issue, given the many points of contact along the extensive transportation routes and the significant potential for impact.

The NCWC also draws on our early experience as participants in the Seaborn hearing and as interveners in the Pickering life extension and Bruce Nuclear waste repository hearings to request that NWMO be required to ensure that independent expertise is fully considered with respect to the repository's structure and its multiple protective geological and physical barriers. Equally important are the surrounding natural and cultural communities, with particular attention to Indigenous concerns as identified in the public's original comments and in NWMO's subsequent impact correspondence.

The NCWC further notes that, notwithstanding the broad scope of the IAA's current Impact Statement "public issues list" that the responses NWMO has begun to respond to, that the following precautionary questions remain to be addressed:

- Given that, in 2023/24, the CNSC has approved nuclear projects on Indigenous territorial lands that subsequently ended up in the to Federal Court, where in two cases First Nations groups were successful, how will NWMO recognize and ensure that the legitimate concerns of all Indigenous peoples whose territories may be affected are meaningfully addressed?
- How can NWMO contend that transportation need not form part of this plan on the basis that no problems have ever arisen during the many years the CNR system has been in operation, and that the waste containers are safe, when, as noted in the February 4 DGR Project comments of independent New Brunswick scholar Wendy O'Connor, only one type of cask—the Used Fuel Transportation Package—has undergone documented testing, and that testing was limited to 1/2- and 1/7-scale models in a drop test and a puncture test, while NWMO's publicly described immersion tests and fire tests were conducted only through computer modelling?
- How will the independence and absence of bias be assured for the IAA Hearing Committee, as must also be the case for NWMO's witnesses?

In conclusion, NCWC looks forward to NWMO's further responses to the public concerns raised and to the final summary report of the Impact Assessment.

Respectfully,

Penny Rankin
President NCWC

Gracia Janes
VP Environment

NCWC Mission:

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