

**Federal Review Team – Comment Form – draft Integrated Tailored Impact Statement Guidelines and draft Permitting Plan**

**Deep Geological Repository (DGR) for Canada’s Used Nuclear Fuel Project**

**Response required by: May 10, 2026**

Please submit the completed form by May 10, 2026, via email to [NuclearWaste-DechetsNucleaires@iaac-aeic.gc.ca](mailto:NuclearWaste-DechetsNucleaires@iaac-aeic.gc.ca). In order to be posted on the Registry, and to align with the Official Languages Act, IAAC is requiring that your submission be provided in French and English. Please note that this is your opportunity to tailor the draft Integrated Tailored Impact Statement Guidelines.

Department/Agency:	Health Canada 4900 Yonge Street – 6 <sup>th</sup> floor Toronto, Ontario		
IA Contact:	Joel Kaushansky Regional Impact Assessment Specialist – Ontario Region	Telephone:	343-550-6213
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**Section 1 – Draft Permitting Plan:**

1. Confirm that all applicable legislative and regulatory oversight that may apply to the project, under the authority of your department or agency, is accurately listed in the draft Permitting Plan.

<p><b><u>Insert response here:</u></b></p> <p>Not applicable</p>
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2. Indicate whether your department or agency has identified any power that it will be unable to exercise to allow the project to proceed, in whole or in part. For more information, please refer to subsection 17(1) of the IAA.

<p><b><u>Insert response here:</u></b></p> <p>Not applicable</p>
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**Section 2 – Integrated Tailored Impact Statement Guidelines:**

1. Please review the [draft Integrated Tailored Impact Statement Guidelines](#) (the Integrated Guidelines) sections that are applicable to your department's or agency's mandate.
2. Using the table below, given the context of the project, please provide any comments and include your recommendation for how the final Integrated Guidelines should be adapted to address your comments.
  - Please indicate any corrections, additions or deletions that should be made to the text including considerations of submissions from First Nations and other Indigenous communities that are relevant to your departmental expertise. Please provide a clear context and rationale for your recommendations, including how their implementation would help focus the assessment on, and resolve, key issues relevant to federal decision-making.
  - Federal expert advice should be solution oriented and commensurate to the context of the project. Advice should be informed by risk-based prudence and evidence in the proponent's [Initial Project Description](#), [Summary of Issues](#) (along with supplemental [Consolidated Information on Transportation of Used Fuel – Plain Language](#)), Response to the Summary of Issues, and publicly available information, with a strong reliance on well-understood mitigation measures, existing guidance, and regulatory instruments that will manage effects. Advice should also be informed by a clear understanding of the project and the local biophysical and socio-economic context. In doing so, departments and agencies are encouraged to ensure that information requirements are proportionate, clearly justified, and practicable within the context of the impact assessment process and associated timelines (i.e., GoC 3-year target for nuclear projects). Advice should focus on outcomes and the information necessary to support sound decision-making, while maintaining flexibility in how requirements may be met. Departments and agencies are also encouraged to avoid duplication with existing regulatory instruments and to identify opportunities to streamline the draft Integrated Guidelines, including proposing the removal or consolidation of requirements where effects can be effectively addressed through existing legislative, policy, or permitting frameworks.
3. *Strategic Questions to Inform Advice*
  - *What knowledge/information does your department have in relation to the key issue? Does your department have any ongoing or upcoming relevant studies/initiatives? What information/action might support mitigating/resolving issues?*
  - *Do we have a good understanding of the pathways of effects? Which key VCs or pathways of effects are missing? Do we have common ground on what the key issues are?*
  - *What federal and provincial tools can be leveraged to resolve issues and avoid duplicating efforts? How can we use existing regulatory frameworks to build confidence in predictions and outcomes?*

Department – Comment ID (e.g., ECCC-01)	Draft Integrated Guidelines Section (and subsection, if available)	Context and Rationale (provide an explanation of your comments)	Recommendation: provide text to be inserted or deleted. Be specific on the location within the draft Integrated Guidelines that the text would be added/deleted.
HC-01	7.2.2.1 Effects on biophysical determinants of health pdf pg. 48	<p>While Health Canada supports the use of the Canadian Ambient Air Quality Standards (CAAQS) as the most stringent criteria for air quality, it should be noted that some CAAQS values are not entirely “health-based” and should not be used to fully estimate health risks. For a quantitative risk assessment, Health Canada recommends using the World Health Organization (WHO) global air quality guidelines for fine particulate matter (PM<sub>2.5</sub>) and nitrogen dioxide (NO<sub>2</sub>) (24-hour and annual averaging periods). These guidelines have been set at the lowest exposure level to an air pollutant above which the WHO is confident that there is an increase in adverse health effects. Adding the health-based approach to the draft Tailored Impact Statement Guidelines (TISG) would help inform health-based recommendations for air quality management (see next column).</p>	<p>Health Canada recommends the following:</p> <p>Addition of a new footnote in Section 7.2.2.1 (pdf pg. 48) on line 1394 in the draft TISG linked to the sub-bullet:</p> <ul style="list-style-type: none"> <li>• “air quality*”</li> </ul> <p><b>*For non-threshold contaminants (e.g., PM<sub>2.5</sub> and NO<sub>2</sub>), or when the predicted concentrations approach or exceed applicable air quality guidelines and standards, it is suggested that modelled concentrations be compared to health-based air quality values, when available (e.g., <a href="#">WHO Global Air Quality Guidelines</a>).</b></p>
PHAC-01	Section 7.2 ( <i>Health Conditions</i> )	<p>The Summary of Issues (SOI), under the heading of Human Health and Well-Being, identified the following key issue for consideration in the federal integrated impact assessment (IA) process: “Psychosocial health impacts: Concerns about the public perception and psychosocial impacts associated with living near the nuclear project, including impacts on mental health.”</p> <p>In the proponent’s Response to the SOI (RSOI), response identifier NWMO-RSOI-18 suggests that assessing this issue through the IA process may be unnecessary (“<i>Conducting any additional assessment would be duplicative and may result in conflict with existing legal requirements</i>”), citing existing requirements under the <i>Nuclear Fuel Waste Act</i> (NFWA; section 18(a)) for ongoing socio-economic assessment and triennial reports to the Minister of Natural Resources on significant social-economic effects on a community’s way of life and on its social, cultural, and economic aspirations.</p>	<p>Retain Section 7.2 and other sections of the draft TISG related to the assessment of the health, social and economic conditions relevant to the project.</p>

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		<p>Section 22(1)(a) of the <i>IAA</i> requires that an IA take into account changes to health, social and economic conditions and their likely consequences arising from designated projects. While the NFWA establishes an ongoing socio-economic reporting mechanism for the proponent, it remains distinct from the IAA requirement to prospectively assess potential effects on health, including psychosocial and mental health effects, in support of federal decision-making. Notably, the NFWA does not specifically reference “health” or explicitly require assessment of potential project effects on physical and mental health outcomes.</p> <p>To support the development of the Impact Statement (IS), the proponent may draw on relevant information generated through its NFWA-related assessment and reporting activities (e.g., <i>Choosing a Way Forward</i>, chapter 14). However, additional assessment work may be required to ensure that the full scope of health-related key issues identified in the SOI and draft TISG are adequately characterized and addressed in the IS.</p>	
PHAC-02	Subsection 7.2.2.2, 4th bullet: <i>“identify any emotional or social stress factor that may result from the project...”</i>	The proposed addition clarifies that emotional and social stress and mental health effects may arise not only from concerns about acute accidents or malfunctions to the Deep Geological Repository (DGR), but also from the exceptional timeframes associated with the long-term storage of used nuclear fuel. The DGR is intended to function at intergenerational and effectively permanent timescales that far exceed individual human experience and control, which may uniquely contribute to chronic stress and anxiety linked to long-term land stewardship and responsibility to future generations. Explicitly referencing these time-related stressors can support a more complete assessment of potential psychosocial health effects.	<b>Subsection 7.2.2.2: ADD</b> the following text to the 4 <sup>th</sup> bullet: <i>“identify any emotional or social stress factor that may result from the project, particularly concerns regarding perceived public safety risks due to the project or due to potential accidents or malfunctions to those living in proximity to the project, as well as mental health and wellbeing concerns among local communities and First Nations and other Indigenous communities related to the uniquely long timeframes and intergenerational nature of the long-term containment of used nuclear fuel in the area;”</i>

Department – Comment ID (e.g., ECCC-01)	Draft Integrated Guidelines Section (and subsection, if available)	Context and Rationale (provide an explanation of your comments)	Recommendation: provide text to be inserted or deleted. Be specific on the location within the draft Integrated Guidelines that the text would be added/deleted.
PHAC-03	<p>Subsection 7.3.2.1, 5th bullet:  <i>“consider potential effects related to greater propagation of infectious diseases and gender-based violence;”</i></p>	<p>(i) <u>Recommended relocation of the bullet within the draft TISG: Infectious disease</u> (including STIs) risks to the community relate more principally to a public health (vs community well-being) outcome; therefore, this consideration would be more appropriately included under subsection 7.2.2.2 (<i>Effects on social determinants of health</i>) rather than subsection 7.3.2.1 (<i>Effects on community well-being and way of life</i>).</p> <p>(ii) <u>Recommended draft TISG text insertion:</u>                      While increased infectious disease risk is not specifically raised as a concern in the Summary of Issues document, general concerns were expressed about “increased risk to vulnerable populations...due to a potential influx of transient workers.” It would be prudent from a public health perspective to consider the potential implications of such an influx on community-level infectious disease risk, including sexually transmitted infection (STI) risk. Deletion of the current reference to gender-based violence (GBV) would avoid conflating infectious disease and GBV risks within this same bullet, especially as GBV risk is addressed elsewhere in subsection 7.2.2.2.</p>	<p><b>Subsection 7.3.2.1 – DELETE</b> the 5<sup>th</sup> bullet (<i>“consider potential effects related to greater propagation of infectious diseases and gender-based violence;”</i>)</p> <p><b>Subsection 7.2.2.2 – INSERT</b> the following as the 7<sup>th</sup> bullet, immediately after the current bullet that begins “describe potential effects of project conditions (e.g., transient employment...”: <i>“consider potential effects related to greater propagation of infectious diseases (e.g., sexually transmitted infections) due to immigration and/or working conditions;”</i></p>

*Insert as many rows as applicable*