

**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:	<a href="#">Indigenous Services Canada</a>		
IA Contact:	<a href="#">Jan Triska</a>	Telephone:	<a href="tel:343-992-3369">343-992-3369</a>
		Email:	<a href="mailto:Jan.Triska2@sac-isc.gc.ca">Jan.Triska2@sac-isc.gc.ca</a>

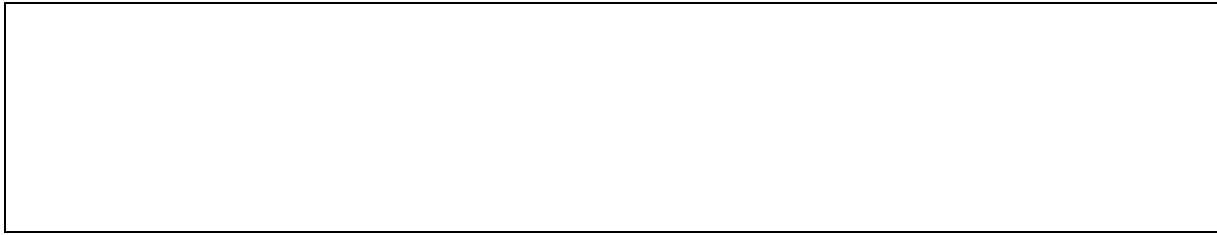
**Section 1 – Draft Permitting Plan:**

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.

**Insert response here:**  
 Indigenous Services Canada does not anticipate issuing permits or authorizations, considering that the proposed project does not appear to be situated on or cross reserve lands.

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.

**Insert response here:**  
 Not applicable



**Section 2 – Draft 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.
ISC- 01	2.1 Project Overview	Provide more fulsome context to the project overview by enhancing the explanation of the waste to be managed at the site and identifying where the waste will be potentially coming from.	Add bolded text to line 240, as follows: “describe and quantify, <b>and describe the source(s) of</b> , the waste to be managed at the site and identify location of waste at interim facilities”
ISC-02	2.2 Project Components and activities	The project location relative to traditional land use, treaty areas, and reserve lands would be better understood with detailed mapping. This will also support consultation and the delineation of spatial boundaries in the effects assessment.	Edit Lines 258-259 to specify the inclusion and specific identification of reserves, additions to reserves (planned), treaty areas, and, <b>with the involved Indigenous nation’s consent, traditional land use areas of and traplines.</b>
ISC-03	5.6.1 Baseline conditions	As is, this section, intended to “identify domestic , communal or municipal water wells...” is limited and does not address First Nation communal supplies based on surface water sources or individual drinking water sources or recreation sources.	After Line 752 - 755 add surface sources for communal systems and private or recreational usage. <b>Describe drinking water sources and intakes, both surface and groundwater (permanent, seasonal, periodic or temporary) of Indigenous Nations and communities. If known, consider including flow rates, approximate wellhead capture zones, and the distance from project activities.</b>
ISC-04	7. Human Environment	<p>The TISG does not clearly indicate the integration of Indigenous-led health and well-being studies into the assessment. As a result, these studies not be meaningfully incorporated into baseline characterization or impact conclusions.</p> <p>ISC recommends clarifying this requirement to improve transparency, methodological rigor, and ensure that Indigenous perspectives on health and well-being are appropriately reflected in the assessment of potential impacts on Indigenous Peoples and their rights.</p>	<p>ISC suggests revising section 7 of the TISG, to include the bolded text below :</p> <p><u>Line 1270</u> - Section 8 Indigenous Nations and communities of the Integrated Guidelines presents a targeted approach by building on the information in Section 7 and [...]. The proponent may provide information in response to Sections 7 and 8 together, if and when appropriate, and as determined by participating Indigenous Nations and communities.</p> <p><b>Where the proponent draws information from Indigenous Nation or community led studies relevant to the project, the proponent must describe the study’s scope, methods, and findings, and explain how those findings were considered and integrated into the baseline</b></p>

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			<p><b>characterization, effects assessment, thresholds of concern, mitigation measures, and significance determinations.</b></p> <p><b>Where differences arise between proponent-led technical studies and Indigenous-led studies (e.g., in scope, indicators, spatial or temporal boundaries, or conclusions), the proponent must clearly describe those differences and explain how they were considered with respect to impacts on Indigenous Peoples’ health, wellbeing, and rights.</b></p>
ISC- 05	7.1.1 General Baseline conditions	Line 1292-1293, “describe relevant community history or context including historical impacts to health, social and economic conditions” could be enhanced to reflect that when referring to a community, one needs to consider the movement off-reserve and the associate issues. Not specifying on- and off-reserve community members risks excluding large portions Indigenous populations from the assessment.	The historical context should identify the conditions upon which the communities were established as reserves, colonial policies and laws placed upon people and children, the movement of people to urban centres.
ISC-06	7.2.1 Baseline for health conditions	Section 7 of the TISG identifies distinct groups to be considered in completing the assessment, including Indigenous Nations and communities, local communities, and local peoples. ISC recommends explicitly including Indigenous Nations and communities in relevant requirements to ensure consistency with this framework. This helps ensure that information specific to Indigenous Peoples, such as drinking water source and intakes, is clearly identified and assessed, supporting a more accurate evaluation of potential impacts on Indigenous health and well-being.	<p>ISC suggests revising <b>section 7.2.1</b> of the TISG, to include the bolded text below:</p> <ul style="list-style-type: none"> <li>• <u>Line 1349</u> - describe drinking water sources and intakes, both surface and groundwater (permanent, seasonal, periodic or temporary) <b>of Indigenous Nations and communities</b>, industries, local peoples, and municipalities. Include flow rates, approximate wellhead capture zones, and the distance from project activities;</li> </ul>

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ISC-07	7.2.1 Baseline for health conditions	ISC recommends this addition to ensure that representative country foods reflect actual Indigenous consumption patterns, supporting accurate and culturally relevant exposure and health risk assessments.	ISC suggests revising section 7.2.1 of the TISG, to include the bolded text below: <u>Line 1355</u> - provide baseline contaminant concentrations, including mercury, in ambient air, sediment, drinking water and tissues of country foods consumed by Indigenous Nations and communities and local communities. <b>The representative country foods must be identified in consultation with potentially impacted Indigenous Nations and communities.</b> The proponent should work with Indigenous Nations and communities and local communities to collect tissue samples where appropriate and to ensure samples collected are representative of the population;
ISC-08	7.2.1 Baseline for health conditions	Harvesting locations are sensitive information to Indigenous Peoples and communities. An approximate location of harvesting areas is a more culturally appropriate approach and protects Traditional Knowledge. For additional guidance, the proponent should refer to Health Canada’s Guidance for Evaluating Human Health Effects in Impact Assessment: Country Foods (2023). <a href="https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-5-2023-eng.pdf">https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-5-2023-eng.pdf</a>	ISC suggests revising section 7.2.1 of the TISG, to include the bolded text below: <ul style="list-style-type: none"> <li>• <u>Line 1355</u> - describe the consumption of country foods (traditional foods) as a health-related behaviour, including, <b>if where possible, the identification of the subpopulations consuming these foods, along with the species consumed, quantities, frequency of consumption, approximate harvesting areas and the methods used to collect the data (consumption pattern survey);</b></li> </ul>
ISC-09	7.2.1 Baseline for health conditions	ISC recommend Including in the Compendium of references :  Health Canada, "Food security," 2025. [Online]. Available: <a href="https://www.canada.ca/en/healthcanada/services/nutrition-science-research/food-security.html">https://www.canada.ca/en/healthcanada/services/nutrition-science-research/food-security.html</a> .  First Nations Food, Nutrition and Environment Study, UNBC, "First Nations Food, Nutrition and Environment Study," 2025. [Online]. Available: <a href="https://www.fnfnes.ca/download">https://www.fnfnes.ca/download</a>	ISC suggests revising section 7.2.1 of the TISG, to include the bolded text below: <ul style="list-style-type: none"> <li>• <u>line 1360</u> - describe the level of food security and food sovereignty within Indigenous Nations and communities and local communities. <b>Refer to the Compendium of references for more information.</b></li> </ul>

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ISC-10	7.2.1 Baseline for health conditions	<p>Where disaggregated data for on-reserve Indigenous populations are not available and baseline conditions are informed primarily by municipal-level data, western scientific approaches, and broad geographic catchments (e.g., Kenora Census Division and the Northwestern Health Unit), ISC recommends that the proponent conduct targeted health, social, cultural, and economic baseline studies for on-reserve Indigenous communities given the relatively small population sizes of these communities, such studies are feasible and would provide meaningful, community-specific insights that cannot be derived from aggregated datasets</p> <p>ISC recommends that the results of these studies be included in the Impact Statement.</p>	<p>ISC suggests revising section 7.2.1 of the TISG, to include the bolded text below:</p> <ul style="list-style-type: none"> <li>• <u>Line 1318</u> - describe current health conditions in the context of physical, mental and social well-being and incorporate a determinants of health approach that extends beyond biophysical health considerations <b>to support a health impact assessment.</b></li> </ul> <p><u>After the line 1331</u> - <b>If on-reserve First Nations and Métis communities disaggregated baseline data on health and social determinant of health are not available to inform the community profiles, describe the scope, depth, and methodology of any targeted additional health baseline work undertaken by the proponent, and demonstrate how input from Indigenous groups has been incorporated into baseline characterization.</b></p>
ISC- 11	7.1.2 General effects assessment	<p>The TISG does explicitly consider land use or development plans, Indigenous community-defined priorities, laws, and responsibilities related to land and water stewardship when articulated through Indigenous Knowledge, engagement, and community-led processes rather than formal planning documents.</p> <p>ISC recommends explicitly including this requirement to improve the completeness and cultural relevance of the assessment and support a more accurate evaluation of potential impacts on Indigenous health, well-being, and rights.</p> <p>This approach is also consistent with requirements in previous TISGs for nuclear projects.</p>	<p>ISC suggests revising 7.1.2 of the TISG, to include the bolded text below:</p> <p><u>Line 1311</u> - As applicable to the assessment, the analysis should describe the goals of <b>First Nations and other Indigenous communities</b>, local or regional land use plans or local or regional development plans and the extent to which the project is aligned with such plans to avoid or enhance effects. <b>The assessment should be informed by community-defined land and water priorities, laws, and care of Relatives responsibilities, whether articulated through formal plans or through Indigenous Knowledge, engagement, and community-led processes, where these are provided to the proponent.</b> The effects assessment should explore and discuss opportunities by which benefits to local communities can be enhanced.</p>

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ISC-12	7.2.2 Effects on health conditions	The current wording (“describe potential project effects on community health profiles”) is unclear and methodologically inconsistent, as health profiles are descriptive baseline tools rather than entities upon which effects occur. Effects are experienced by individuals and communities through changes in health conditions and determinants of health, not on the profiles themselves.	ISC suggests revising 7.2.2 of the TISG, to include the bolded text below:  <u>Line 1370</u> - describe any potential project effects on <b>the health conditions and determinants of health of Indigenous Nations and communities and local communities, informed by the</b> community health profiles (see Section 7.2.1);
ISC-13	7.2.2.1. Effects on biophysical determinants of health	The requirement in the TISG does not mention the consideration of all relevant source-exposure pathways . All relevant source-exposure pathways should be explicitly considered, supporting a comprehensive assessment of potential contaminant transport and associated risks to human health, including Indigenous Peoples.	ISC suggests revising 7.2.2.1 of the TISG, to include the bolded text below:  <u>Line 1402</u> - describe the fate and estimated travel times of contaminants of potential concern (COPC) from contaminant source areas to drinking water sources, <b>for all relevant source-exposure pathways (e.g., drinking water sources)</b> ;
ISC -14	7.3.1 Baseline for social conditions	Strengthen the underlying methodology for this section by emphasizing the long term nature of this project. Long term land use planning and resource development planning should be considered as part of the context for setting this baseline, seeing that the project itself will not be fully operation until the 2040s. From the perspective of Indigenous nations potentially affected by the project, it is the long term context which especially matters.	Amend lines 1490 to 1491 by adding in bold the expression “ <b>long term</b> “ to read: “consideration of relevant current and future <b>long term (meaning extending into the operations phase of the DGR facility, which starts in 2044 or later)</b> land use from local, regional, or provincial land use or resource development plans”
ISC - 15	7.3.2.1 Effects on community well-being and way of life	There should be, where feasible, a consideration of how workforce-related population changes and flows could foreseeably impact populations on Indigenous reserve lands, especially seeing that many of the Indigenous communities potentially impacted have members living on reserve lands. In some cases, Indigenous group members move back to reserves, given new economic opportunities (this also creates	Lines 1573 to 1575 – Add the distinction of “ <b>on reserve</b> ” to the following statement, to read: “describe, at the community level, the expected interactions and their effects, between the project's construction, operation and maintenance workforce and local communities, <b>including populations on reserve lands</b> , businesses and residents; describe in-and out-migration effects, related to activities in all phases of the project lifecycle, including changes in <b>on reserve population</b> ”

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		a linkage to the project’s effects on housing availability on reserves and on businesses located on reserves).	
ISC- 16	7.3.1.Social conditions baseline	The section describing social conditions baseline ought to also include references to housing, education and infrastructure in order to more fully assess positive and adverse effects of the project on health, social and economic conditions. Social conditions within Indigenous communities are also communal based, therefore it is important to clarify this further.	Modify Section 7.3.1, starting on Line 1480, to include housing, education, community infrastructure, employment, businesses, emergency management, and challenges faced in the community to receive equitable program delivery in all areas.
ISC- 17	8.1.2 Effects to physical heritage, and structures, sights and things of significance	The section should include ability to see the night time sky, as many parts of northern Ontario have lost visible sky as light pollution from urban centres and industry have denied residents of this experience. This experience falls within the “peaceful enjoyment of land” aspect of using lands for Indigenous traditional purposes.	Starting at Line 1821, consider adding a bullet point to read: “effects on structures, sites or things of significance including: <ul style="list-style-type: none"> <li>• <b>Night time sky free of light pollution</b></li> </ul>
ISC - 18	8.4.1 rights of Indigenous Peoples – Baseline conditions	The description of the baseline conditions listed should demonstrate consideration of the effects of colonization, the <i>Indian Act</i> , imposition of the trapline system, Treaties, provincial hunting and fishing laws, etc. The treaty rights also include the connection to traditional lands, the connection to the knowledge of landscape and the resultant sense of community well-being.	Starting at Line 1943, add a sentence to include “cumulative effects not limited to industrial activities, but include colonization, the Indian Act, imposition of trap line system, Treaties, Provincial hunting and fishing laws, etc.”
ISC-19	9.1 Risk assessment	The current wording regarding the complicating factors in the risk assessment section is broad and may lead to inconsistent interpretation.	ISC suggests revising section 9.1 of the TISG, to include the bolded text below: <ul style="list-style-type: none"> <li>• <u>Line 2020</u> - take into account the lifespan and design of different project components, complicating factors such as :</li> </ul>

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		<p>ISC recommends specifying examples of potential complicating factors to improve clarity and ensure consistent consideration of a comprehensive range of natural and human-induced events.</p> <p>This approach is consistent with language used in other TISGs for nuclear projects, which require detailed consideration of external events and stressors.</p>	<ul style="list-style-type: none"> <li>▪ <b>natural events such as flooding, earthquake/seismic activity, forest fires, high winds, tornadoes, hurricanes, blizzards, drought, ice storms, hail and lightning;</b></li> <li>▪ <b>malevolent acts, including the potential for vandalism or sabotage;</b></li> <li>▪ <b>vehicle accidents and collisions;</b></li> <li>▪ <b>other human-induced external events, such as at other facilities, including foreseeable adjacent nuclear facilities, where applicable; and</b></li> <li>▪ <b>potential climate change over the project lifecycle;</b></li> </ul>
ISC-20	9.1 Risk assessment	<p>The current wording regarding the spatial and temporal boundaries for the effects assessment associated with accidents and malfunctions doesn't reflect Indigenous perspectives.</p> <p>ISC recommends including this addition to ensure spatial boundaries reflect Indigenous perspectives and areas of importance, supporting a more accurate and complete assessment of impacts on Indigenous health, well-being, and rights.</p> <p>This approach is consistent with language used in other TISGs for nuclear projects.</p>	<p>ISC suggests revising section 9.1 of the TISG, to include the bolded text below:</p> <p><u>Line 2047</u> - identify and justify the spatial and temporal boundaries for the effects assessment associated with accidents and malfunctions. The spatial boundaries identified for effects from potential accidents and malfunctions will generally be larger than the boundaries for the project effects alone, and may extend beyond Canada's jurisdiction. <b>Spatial boundaries must be defined through a process that incorporates feedback from Indigenous Nations and communities;</b></p>
ISC-21	9.2 Mitigation measures	<p>ISC recommends specifying "off-site response organizations" to ensure clarity, as this requirement is intended to address mutual aid arrangements involving external response capacity in the event that the accident or malfunction exceeds proponent resources.</p>	<p>ISC suggests revising <b>section 9.2</b> of the TISG, to include the <b>bolded text</b> below:</p> <ul style="list-style-type: none"> <li>• <u>Line 2069</u> - describe mutual aid arrangements <b>with off-site response organizations</b> in the event that the accident or malfunction exceeds proponent resources and how to access these resources; and</li> </ul>

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ISC-22	9.2 Mitigation measures	<p>The TISG does not clearly describe how potential discovery of additional risks to the health and safety of the public and environment that were not anticipated in the Impact Statement will be considered.</p> <p>ISC recommends a proactive approach to managing unforeseen risks over the project lifecycle. Given the extended lifespan of a Deep Geological Repository and the long-term containment of nuclear waste, not all risks can be anticipated at the time of assessment. This requirement supports adaptive management and long-term protection of human health and the environment, including for future generations.</p> <p>This approach is consistent with language used in other TISGs for nuclear projects.</p>	<p>ISC suggests revising section 9.2 of the TISG, to include the bolded text below:</p> <ul style="list-style-type: none"> <li>• <b>After the Line 2072- outline the strategy that will be taken upon the potential discovery of additional risks to the health and safety of the public and environment that were not anticipated in the Impact Statement, including the development of additional mitigation measures.</b></li> </ul>
ISC-23	9.3 Emergency management	<p>The TISG doesn't explicitly describe the training requirements and participation to support capacity-building, improve coordination during emergencies, and help ensure that these response measures are effective and culturally appropriate.</p> <p>Therefore recommending to describe the above aspects; this will help protect Indigenous health and safety, as well as align with the need for inclusive and effective emergency preparedness planning, which has been highlighted by First Nations as a key issue.</p> <p>(These additions are consistent with language used in other TISGs for nuclear projects.)</p>	<p>ISC suggests revising section 9.3 of the TISG, to include the bolded text below:</p> <ul style="list-style-type: none"> <li>• <b>describe emergency response training and exercise programs, including a description of the participation and training agreements with Indigenous Nations and communities that could be impacted by accidents or malfunctions;</b></li> <li>• <b>describe any plans for delivering training and exercise programs in local Indigenous languages for potentially affected Indigenous Nations and communities;</b></li> </ul>