

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. 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:	Transport Canada		
IA Contact:	Jeremy Craigs	Telephone:	
		Email:	Jeremy.craigs@tc.gc.ca

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:

Transportation of Dangerous Goods is a compliance-based regime. A formal approval is not required to construct the project, but the proponent would need to meet the Transportation of Dangerous Goods regulatory requirements prior to commencing operational activities subject to the *Transportation of Dangerous Goods Act, 1992*.

The proponent previously identified potential regulatory requirements under the *Railway Safety Act*, and *Aeronautics Act*, which are not identified in the Permitting Plan. It is anticipated that these items may be addressed later in the Detailed Permitting Plan, if applicable. These requirements are not generally required to start construction.

Transport Canada recommends the following editorial changes to the Permitting Plan:

3.6 Compliance with Transportation of Dangerous Goods Act, 1992

Based on the available project information provided to date, compliance with the Transportation of Dangerous Goods (TDG) Act and Regulations may be required for transportation activities. An Emergency Response Assistance Plan (ERAP) approved by Transport Canada would be required for the transport of radioactive material in quantities exceeding the ERAP Index specified in the TDG Regulations. An Equivalency Certificate would be required to conduct transportation activities in a way that deviates from the TDG Act or Regulations.

4.6.1 Description

Transport Canada develops safety standards and regulations, undertakes risk-based monitoring and oversight, and provides expert advice on the transportation of dangerous goods to promote public safety in the transportation of dangerous goods by the four modes regulated by Transport Canada (air, marine, rail and road). TDG research and data analysis are also part of the TDG program, as is international collaboration to ensure the safe and secure transport of dangerous goods worldwide.

Transport Canada is responsible for the monitoring of emergency response assistance plans (ERAPs). Designed to assist emergency responders, an ERAP describes what to do in the event of an actual or expected release of certain high-risk dangerous goods during transport.

4.6.4 Contact Information

For more information on the requirements of the Transportation of Dangerous Goods Act or Regulations, please contact your regional or modal TDG office:

Ontario Regional Office
Phone: 1-416-973-1868
Email: TDG-TMDOntario@tc.gc.ca

For further guidance on the authorization process for ERAPs, please visit our webpage: <https://tc.canada.ca/en/dangerous-goods/emergency-response-assistance-plans-eraps> or contact:

Response Operations Program
Phone: 613-302-3581 / TTY: 1-888-675-6863
Email: ERAPapplications@tc.gc.ca

For further guidance on the authorization process to request an equivalency certificate, please visit our webpage: <https://tc.canada.ca/en/dangerous-goods/application-equivalency-temporary-certificate> or contact:

Approvals and Special Regulatory Projects Division
Phone: 1-855-298-1520 (select option 2)
Email: tdgapprovals@tc.gc.ca

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:

The proponent has identified potential regulatory requirements under the *Canadian Navigable Waters Act*. Transport Canada does not have sufficient information to determine whether TC will exercise a power, perform a duty or function in relation to the project.

More information about the project components is needed to determine what regulations might be applicable to the project. The proposed Integrated Guidelines have broadly addressed some of these areas. TC has provided a recommendation to include additional clarity in the Integrated Guidelines in the comment table.

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.
TC-01	7.3.1	TC recommends the inclusion of language used in the Wesleyville TISGs to further clarify information requirements related to navigation and the <i>Canadian Navigable Waters Act</i> .	Recommended language: navigable waterways. In support of federal permitting coordination, if the project includes works that may interfere with navigation and which may require approval(s) or exemption(s) by Transport Canada’s under the <i>Canadian Navigable Waters Act</i> , the proponent is encouraged to coordinate the

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.
			<p>navigability assessment (baseline conditions) during the development of the Impact Statement in consultation with Transport Canada and users, including First Nations and other Indigenous communities, to allow Transport Canada to consider whether an approval or exemption under the <i>Canadian Navigable Waters Act</i> is required and to expedite any subsequent regulatory process, and to include a table listing:</p> <ul style="list-style-type: none"> - waterbody or watercourse impacted; - type of work proposed; - physical characteristics of waterbody or water course; - known or suspected past, current or future use of the waterway; - potentially affected waterway users and concerns regarding waterway use and access; and - physical impacts from proposed work upstream and downstream;