

**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:	Women and Gender Equality Canada		
IA Contact:	Miga Chultem, Director, GBA Plus Centre of Expertise, Strategic Policy Branch	Telephone:	819-938-1132
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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.

**Insert response here:**

Not applicable. WAGE does not hold any regulatory power, functions, or duties.

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:**

- Please review the [draft Integrated Tailored Impact Statement Guidelines](#) (the Integrated Guidelines) sections that are applicable to your department’s or agency’s mandate.
- 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.
- *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.
WAGE-01	<b>1.2 Selection of Valued Components</b> , pg. 4.	“Rationale for inclusion” is vague in areas and does not include clear potential social and health impacts that may be experienced by Indigenous Peoples such as gender-based violence (GBV).  Sources:	Consider the following edits, <i>in blue</i> , to the text below:  Project-related activities may result in changes to the local and regional economy, demand on healthcare and other local services, and an influx of temporary workers may alter the health, social and economic

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>The report “<a href="#">Responding to the calls for justice</a>: addressing violence against Indigenous women and girls in the context of resource development projects” cited several contributing factors for GBV, such as transient workers.</p> <p><a href="#">Call to Justice published by the National Inquiry into MMIWG</a> - see Call for Justice 13.4</p> <p><a href="#">Gender based violence is a public health issue: using a health systems approach</a> (World Health Organization)</p>	<p>conditions of the region. Project-related activities may result in changes to a variety of environmental receptors, which could indirectly result in impacts to human health. <a href="#">There are also potential effects on the safety and well-being of people (e.g., Gender-Based Violence) including certain population groups that are made vulnerable to those effects (e.g., Indigenous Peoples, women; youth; individuals with disabilities, and individuals identifying within the LGBT2Q+ community).</a></p>

<p>WAGE-02</p>	<p><b>1.2 Selection of Valued Components</b>, pg. 5.</p>	<p>“Rationale for inclusion” is vague in areas and does not include clear potential social and health impacts that may be experienced by Indigenous Peoples such as gender-based violence.</p> <p>Sources:</p> <p><i>In addition to</i> resources linked under comment WAGE-01.</p> <p><a href="#">Addressing Inuit Women’s Economic Security and Prosperity in the Resource Extraction Industry</a> (PDF)</p> <p><a href="#">Standard Mitigation Measures: Streamlining the impact assessment process</a> (Impact Assessment Agency of Canada)</p>	<p>Consider the following edits, <b>in blue</b>, to the text below:</p> <p>Project-related activities could result in changes to land access and use for cultural purposes, increased perceptions of risk associated with radioactive waste, health and wellbeing through impacts to air and water quality, and the social and economic conditions of Indigenous Peoples.</p> <p>Potential impacts from an influx of temporary workers including infrastructure and services required to support them (e.g., housing, transportation).</p> <p>Potential social impacts from an influx of temporary workers including health and public safety risks (e.g., increased risk of Gender-Based Violence for Indigenous women and girls).</p>
<p>WAGE-03</p>	<p><b>1.3 Preparing the Impact Statement</b>, pg. 6.</p>	<p>Slight edit for consistency of language.</p> <p>From a WAGE perspective, GBA Plus is defined as an intersectional approach, an analytical tool, and a process versus a “lens.”</p> <p>Source: <a href="#">What is Gender-based Analysis Plus - Canada.ca</a></p>	<p>Consider the edits, in blue, below:</p> <p><del>A</del>-GBA Plus <b>lens</b> should be applied, where relevant and as identified by Indigenous Nations and communities, throughout the assessment to identify and assess potential disproportionate or differential effects on diverse population groups and how these groups may experience project effects differently;</p>
<p>WAGE-4</p>	<p><b>7.2.2.2. Effects on social determinants of health</b>, pg. 45.</p>	<p>Recommend making it clear that Gender-Based Violence is a public health and safety concern.</p>	<p>Consider the following edits, <b>in blue</b>, to the text below:</p> <ul style="list-style-type: none"> <li>identify any emotional or social stress factor that may result from the project, particularly concerns 1454 regarding perceived public safety risks, <b>including but not limited to Gender-Based Violence</b>, due to the project or due to potential accidents or malfunctions 1455 to those living in proximity to the project;</li> </ul>

*Insert as many rows as applicable*