



Natural Resources
Canada

Ressources naturelles
Canada

12 May 2026

CIAR File No: 88774

Kathryn MacCarthy
Panel Manager
Impact Assessment Agency of Canada

Submitted by email: nuclearwaste-dechetsnucleaires@iaac-aeic.gc.ca

Subject: NRCan Response on the Draft Tailored Impact Statement Guidelines and draft Permitting Plan Response for the Deep Geological Repository for Canada's Used Nuclear Fuel Project

On April 10, 2026, Natural Resources Canada (NRCan) received a request from the Impact Assessment Agency of Canada (IAAC) to comment on the draft Tailored Impact Statement Guidelines (TISG), and draft Permitting Plan for the Deep Geological Repository for Canada's Used Nuclear Fuel Project (DGR), located near, Ignace, Ontario.

Pursuant to section 23 of *Impact Assessment Act* (IAA 2019), NRCan is participating in the impact assessment of the DGR Project as a subject matter expert providing expertise in geosciences, nuclear waste management policy, nuclear energy economics and policy, explosives safety, manufacturing and storage. NRCan has provided comments on the draft TISG and draft Permit plan in the Appendix 1: Federal Review Team Comment Form .

As the impact assessment process advances, or if there are any changes to the scope of this project, NRCan remains available to provide subject matter expertise that is within it's departmental mandate.

If you have any questions, comments, or concerns, please contact Natalie.Robinson@nrcan-mcan.gc.ca

Sincerely,

<Original signed by>

Natalie Robinson

Senior Impact Assessment Officer
Impact Assessment Division
Natural Resources Canada

CC: Christina Clarke, Acting Director, Impact Assessment Division

Appendix 1 Federal Review Team Comment Form

Canada 

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:	Natural Resources Canada		
IA Contact:	Natalie Robinson	Telephone:	403-483-4587
		Email:	Natalie.Robinson@nrca-nrcan.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:

NRCan confirms all the 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.

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:

NRCan has not identified any power that it will be unable to exercise to allow the project to proceed, in whole or in part.

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., ECC-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.
NRCan-01	Section 2.6 Project components and activities	The information on explosives will be important to confirm requirements for a licence under the <i>Explosives Act</i> and respect the regulations under the <i>Explosives Act</i> .	NRCan recommends inserting the following text as an additional bullet: <ul style="list-style-type: none"> • explosives storage and manufacturing (method, location, etc.), if applicable
NRCan-02	Section 2.3.4 – Alternative means of carrying out the project (bullet 1, sub-bullet 12, p 10)	The text in the sub bullet 12 refers to “waste management strategies, including non-radioactive waste and low and intermediate level radioactive waste”. NRCan’s assumption is that this refers to low level waste (LLW) and intermediate level waste (ILW) generated on-site through the operations of the Deep Geological Repository.	NRCan recommends to revise the bullet to: <ul style="list-style-type: none"> • <u>waste management strategies for waste generated at the DGR site, including non-radioactive waste and low and intermediate level radioactive waste:</u>

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.
NRCan-03	Section 4.1 – Leveraging Existing Information	<p>Under section 18(a) of the <i>Nuclear Fuel Waste Act</i>, the NWMO is required every three years, in its triennial report, to include “a summary of its activities respecting the management of nuclear fuel waste during the last three fiscal years, including an analysis of any significant socio-economic effects of those activities on a community’s way of life or on its social, cultural or economic aspirations.”</p> <p>The information contained in these reports and the supporting analysis can be leveraged to provide background information on the NWMO’s previous activities, their self-assessed socioeconomic impacts, and actions they have taken to mitigate these impacts. These activities and analyses may be relevant and/or be responsive to other requirements in the draft TISGs.</p>	<p>NRCan recommends to insert the following text at the end of paragraph 1 after (e.g., Confidence in Safety-Revell Site-2023 Update):</p> <ul style="list-style-type: none"> In addition, the Nuclear Fuel Waste Act requires that the NWMO provide an analysis of any significant socioeconomic effects of its activities on a community’s way of life, culture, or economic aspirations (Section 18(a)) in its triennial reports to the Minister of Natural Resources.
NRCan-04	Section 5.2.1 Baseline Conditions (bullet 6, p 15)	<p>The provided 3-D model for the site does not seem to include the additional boreholes that were drilled after the model was prepared, thus the model does not appear to have been updated. It would also be useful to see the planned borehole traces in the 3-D geological model.</p> <p>Structural data has been provided in a 2-D map, NRCan suggests that this information should also be incorporated into the 3-D model to allow for a comparison between what has been identified through surficial mapping and geophysical surveys versus what is captured below surface by the completed boreholes.</p> <p>Structural data incorporated into the 3-D model will also assist with other sections (e.g., 5.4 Radiological conditions; 5.6 Groundwater and surface water)</p>	<p>NRCan recommends to revise “present a 3-dimensional geological model developed for the site based on the conceptual model of the geological environment” to the following:</p> <ul style="list-style-type: none"> present a 3-dimensional geological model including all available borehole information for the project site and all available structural data aligned with the conceptual model of the geological environment;

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.
NRCAn-05	Section 5.2.1 Baseline conditions (after bullet 1)	Mineral resource potential in bullet 1, should be separated out from these requirements and made its own point. Included in this point should be a review of any historical exploration done in the area and any future potential in or near the project site. This is a desktop exercise.	NRCAn recommends to revise text in bullet 1 to: <ul style="list-style-type: none"> describe the regional, local, and site-specific geology relevant for the project, including the petrology, mineralogy and geochemistry (including hydro geochemistry), stratigraphy, structural geology and tectonic setting; NRCAn recommends to insert the following after bullet 1: <ul style="list-style-type: none"> Describe any historical exploration work conducted in and around the project site and any future mineral resource potential for the project site or surrounding area;
NRCAn-06	Section 11 Effects of the Environment on the Project (p 69)	NRCAn notes that most requirements related to seismic hazard assessment are not presented in the bulleted TISG but are instead located in Appendix A and the associated REGDOCs. To support completeness and transparency, NRCAn recommends including a high-level requirement directly in Section 11.	NRCAn recommends to insert the following bullet: <ul style="list-style-type: none"> Provide details of a site-specific seismic hazard assessment that captures the centre, body, and range of technically defensible interpretations, including analysis of fault displacement hazards, as applicable. The assessment should describe and justify the selected level of peer review.
NRCAn-07	Section 5 Physical Environment and 11 Effects of the Environment on the project (p 69)	NRCAn recommends that the TISG includes information on the planned seismic monitoring systems.	NRCAn recommends to insert an additional bullet: <ul style="list-style-type: none"> Provide a description of the planned seismic monitoring system.