SCAN! Ontario Project

Ten Reasons to Say No: New Nuclear at Wesleyville (NNW) Project

1. OPG Refuses to Consider Alternatives
2. Expensive Nuclear makes High-Cost Electricity
3. Stranded Assets and Public Indebtedness
4. Foreign Technology and Threats to Sovereignty
5. Governments Change and Priorities Shift
6. False Claims on Net Zero and Climate Impacts
7. 'Just Trust Me' Isn't Good Enough
8. Vulnerable Species at Risk
9. NNW's Nuclear Waste: Management or Mismanagement?
10. Consultation is not Free, Prior and Informed Consent

Submission to the Impact Assessment Agency of Canada and the Canadian Nuclear Safety Commission regarding the Initial Project Description for the New Nuclear at Wesleyville Project

February 11, 2026

Ten Reasons to Say No: New Nuclear at Wesleyville (NNW) Project

The federal government has convened an initial Impact Assessment of Ontario Power Generation's (OPG) plans to build a 10,000 MW nuclear reactor complex in the Port Hope area. The OPG site is about 540 hectares of land on the shore of Lake Ontario. As OPG acknowledges, the land is the traditional and treaty territory of the Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations (MS-WTFNs).

If built there will be 8-10 large scale reactors constructed on environmentally sensitive land and situated close to urban centers. OPG lists 'potentially affected communities' as Port Hope, Cobourg, Hamilton township, Clarington, Oshawa, Peterborough, and Lindsay. OPG has submitted a project description that it calls the New Nuclear Wesleyville project (NNW). The site is not currently licensed for nuclear generation.

After reviewing OPG's report, the Ontario Project of Seniors for Climate Action Now! (SCAN!) recommends that the Impact Assessment Agency of Canada (IAAC):

- notify OPG that its submission is incomplete and as such it is premature to start an impact assessment;
- when there is a more complete project description available, that a full impact assessment and public hearing be convened;
- that such an assessment includes a comprehensive and objective comparison of nuclear costs versus renewables, energy efficiency, and distributed energy resources;
- that consideration be given to returning the site to First Nations communities as suggested by the MS-WTFNs.

As an initial response to the OPG submission, the SCAN! Ontario Project offers the following ten reasons why the NNW should not be approved.

1. ÒPG Refuses to Consider Alternatives.

OPG, which is fully owned by the Ontario Government, has submitted its description for its proposed NNW project. The project description is one of the initial requirements in the federal government's impact assessment of new nuclear reactors.

In a stunningly shortsighted comment OPG states: "No alternatives to the project are being considered." (p9)

NNW stands out for many reasons. If built, it will be the largest complex of nuclear reactors in the world. It will likely be the most expensive nuclear undertaking. It will be paid for by the citizens of Ontario through taxes and rate hikes. And it is being proposed at the wrong time.

Common sense, fiduciary responsibility, due diligence, risk assessment and sound planning all point to the need to consider alternatives to the project.

OPG is proposing to build NNW at a time when the energy landscape is changing rapidly and fundamentally. The world is undergoing an energy transition, driven by the rapid expansion of low-cost renewable energy and efforts to improve energy efficiency. While there have been other historical shifts from one dominant energy source to another they have been characterized by a gradual replacement, the incremental integration of new energy technologies and the continuation of old energy sources.

The current transition is different. It is pushed by the environmental imperatives of the climate crisis and the threat of ecosystem collapse. It is fueled by the plummeting cost of solar energy, wind power, and batteries and it is shaped by the emergence of distributed rather than centralized energy sources. The scale of the transition is extended by the potential for energy leap-frogging in the Global South and the oversized role of China as an energy superpower. These all point to a more rapid and far-reaching transition.

A few decades ago, renewables were on the periphery of energy planning and development. Now they are a mainstream economic reality. Solar, wind, and battery storage are the most cost-efficient, fastest-growing power sources on earth.

It is an ironic coincidence of timing that OPG is planning major expenditures on nuclear reactors at a time when the cost equations have tipped so overwhelmingly in favour of renewables. In Canada contracted energy costs from wind and solar, have 'been cut in half' over the last decade. In contrast, the cost of nuclear has risen with analysts reporting it to be two to three times the cost of renewables contracted in the same year. Looking forward those cost discrepancies get even wider.

NNW will take decades to build. If successful OPG estimates a lifetime of about 70 years. At that time there will be another two or three decades of decommissioning. OPG is about to embark on a project with implications stretching over 100 years. Surely that warrants a consideration of the alternatives.

It is not inevitable that renewables will replace other forms of energy. Energy choices are as much about power, profits, and politics as they are about technology. Even so, the current trajectory of renewables and storage makes it imperative that, prior to any approval for the NNW, OPG be instructed to review the alternatives.

A consideration of alternatives needs to be objective, systematic and comprehensive. It has to be both specific to the site and much broader than the site.

2. Expensive Nuclear makes High-cost Electricity

Nuclear plants are very expensive. They take a long time to build. They don't perform as well as expected. They incur costly repairs. They have to be rebuilt before they reach their 'best before' dates. At the end of their life they have to decommissioned. And their radioactive spent fuel rods have to be securely stored and monitored for thousands of years.

All of this makes the electricity produced by nuclear reactors very expensive. So expensive that private investors are reluctant to put up their own money to build the plants. Instead, they want the public to foot the bills and underwrite their profits.

There is now compelling evidence from a wide range of real-world situations which shows that electricity from solar, wind and storage is much cheaper than nuclear power. In the case of Ontario, the cost comparisons put nuclear at a great disadvantage. The cost of nuclear electricity is the Achilles heel of the nuclear industry.

If built, the NNW project will be the largest and costliest nuclear plant in the world. While there are no official projections for the cost of the NNW it is possible to estimate those costs by applying 'Levelized cost of energy' (LCOE) standards used by the industry. Applying the mid-range of those costs suggest that a 10,000 MW nuclear complex would cost about $160 billion. Using a higher range estimate, one closer to the actual costs of recent builds such as the Vogtle nuclear plant in the US, would put the price tag around $230 billion.

To put that number in perspective the cost of the Trans Mountain pipeline is around $34 billion.

In November 2025, the Ontario Energy Board (OEB) applied a 29% increase in electricity generation costs for residential customers. In an effort to cushion and hide the price hike the government shifted some of those costs to our taxes. The current cost of the province's electricity subsidy programs is close to $6 billion annually. The recent increase in the subsidy will drive that number considerably higher. Even before the latest subsidy the province's Financial Accountability Office estimated that over the 20 years from 2020-21 to 2039-40 the subsidies will cost taxpayers $118 billion.

In late Dec 2025, OPG applied to the OEB for a 72.6% increase in the price it is paid for nuclear power. The OPG wants to start charging customers for the refurbishing costs of Pickering and the construction of the Small Modular Reactors (SMR) at Darlington. When approved (because the OEB has little choice in the matter) the rate increases will be added to our electricity bills beginning in January 2027. It has not yet been determined what the on-bill increases will be. Whatever it is, Ontario residents will be paying for electricity years before it is even generated.

These increases are just the start of a long series of electricity bill shocks. If 10,000 MW of electricity is produced at the NNW project Ontario electricity consumers will be financially exhausted. Ontario electricity customers and taxpayers cannot afford to pay the nuclear bills.

3. Stranded Assets and Public Indebtedness

The world is in the ramp-up phase of an accelerating renewable energy boom. The statistics are staggering. By 2023 wind and solar were already providing a larger share of global electricity production than nuclear (13% verses 9.2% (international Atomic Energy Agency 2024). In 2024 92.5% of the world's new electricity generating capacity was renewables. Solar costs have declined by 90% over the last decade.

The growth of renewable energy is putting long term conventional energy assets at risk of creating stranded assets. The prospect of stranded assets and the evaluation of those risks are now routinely considered in any energy development decisions. While stranded assets are more commonly raised in connection with fossil fuel reserves, the current NNW project waves red flags over the enormous sunk investments and long projected operating life. Assets become stranded because of unanticipated write downs and devaluations.

In Ontario we have already seen this happen. In 1999 Ontario Hydro was on the verge of collapse. The nuclear expansion of the 1970's and 1980's had left the utility with a staggering debt. In response the Ontario government shifted that stranded debt onto ratepayers and taxpayers. We are still paying for those past mistakes.

Looking to the future, the risk of nuclear assets becoming stranded are even more pronounced because of the declining costs and rapid adoption of renewable energy technologies. There is little doubt that a project of 8-10 nuclear reactors with a project life of 70 years risks asset underutilization and abandonment. In Ontario there is an added complication. While investors are now routinely considering the risks of stranded assets in their decision-making it appears that OPG is not. OPG is wholly owned by the Government of Ontario. It is proposing the NNW project because that is the policy direction set by the government. In its description of the NNW project OPG makes the point. In fact, the Ontario government has passed legislation to achieve that goal. Now in place of prudent financial management and a clear-headed assessment of risk we have an agency that is shielded from those future risks. Instead, those risks are shouldered by the broader public.

4. Foreign Technology and Threats to Sovereignty

The OPG's NNW is being advanced at a difficult time in our relations with the US. Canada is facing threats to our independence together with economic and trade developments that could undermine our sovereignty.

There is growing public concern about the degree our economy is shaped by foreign interests, how much of our industry is owned by American multinationals and the share of our resources controlled by foreign investors.

In 2026 OPG's choice of nuclear reactors for its proposed NNW or, in this case, a decision to postpone that choice matters a great deal. We need to know whether the reactor design is Canadian or foreign controlled. We need to know whether there is a domestic fuel supply chain or whether relying on imported fuel increases our vulnerability to the decisions of other countries.

The OPG has noted that "specific reactor technology has yet to be chosen for the NNW site." (p67 full report) Instead of announcing a particular reactor design OPG has provided a representative envelope encompassing "Pressurized Water Reactors (PWRs), Pressurized Heavy Water Reactors (PHWRs) and Boiling Water Reactors (BWRs)."

From a perspective of sovereignty and import dependency the approach of a 'representative envelope' proposed by OPG is inadequate.

OPG has provided examples of reactor technologies which are being considered. These include:

- PWR – Westinghouse's AP 1000 or EDF's Evolutionary Pressurized Reactor (EPR)
- PHWR – CANDU such as AtkinsRealis' CANDU MONARK
- BWR – GE-Hitachi's BWRX-300T

These specific examples reinforce our concerns.

EDF Evolutionary Pressurized Reactor (EPR)

EDF is responsible for operating France's fleet of 57 reactors, as well as nuclear plants in the UK. It is owned by the government of France and is currently reviewing its operations to be more aligned with government policy. This could well mean less commitment to other countries' nuclear projects. The reactor design relies on uranium oxide (UO2) enriched up to 4.2%. In Canada there is no domestic supply chain to provide enriched uranium. This fuel would have to be imported. Enriched uranium nuclear fuels have elevated risks around security and proliferation concerns. EDF's EPR reactors have been plagued with problems. The latest plants built in Europe and the UK have faced massive cost overruns, prolonged construction delays and design problems with fuel rods.

Westinghouse's AP 1000

Westinghouse Electric is owned by Brookfield Renewable Partners, a private equity company and Cameco, a large Canadian uranium fuel company. The AP 1000 reactor design is used in a number of nuclear plants around the world. The AP 1000 core relies on fuel with an enrichment range of 2.35 to 4.8%. This enriched uranium is not produced in Canada. The most recent nuclear plant to be built using the AP 1000 design is the Vogtle plant in the US. This is the first new nuclear facility to come on line in the US in thirty years. Huge cost overruns have made it

the most expensive nuclear plant in the world. It was eight years behind schedule. China has also had difficulties building nuclear plants with the AP 1000 on time and on budget.

GE-Hitachi BWRX 300

The company is now called GE Verona Hitachi Nuclear Energy and is headquartered in the US. It is providing the technology for the Small Modular Reactors (SMRs) at Darlington. The reactor design is foreign controlled and requires imported enriched uranium fuel. The company has its own fuel manufacturing sites in the US, in Japan and in France. It is focused on increased enrichment and is licensed in the US to fabricate and transport up to 8% enrichment. The supply chain at Darlington will be vulnerable to the erratic machinations of US national interests. In addition, the design has no operating track record.

OPG should be required to make a determination on nuclear reactor design before the impact assessment process goes any further. The choice of technology matters in terms of sovereignty, technology independence and domestic supply chains. When the federal government announced a huge loan of $304 million to AtkinsRéalis to develop a new generation CANDU reactor (MONARK) it emphasized the following;

"CANDU reactors maintain an almost entirely Canadian-made, Canadian-designed supply chain…They are also fuelled by uranium mined in Saskatchewan without the need for enrichment."

Those points are referenced to reinforce concerns with sovereignty and the risks associated with imported fuels. They are not meant to endorse the CANDU reactor nor AtkinsRéalis. CANDU reactors have serious shortcomings. CANDU has been sold to AtkinsRéalis, the new name of SNC Lavalin. That CANDU is now held by a company guilty of high-level corruption and a legacy of engineering and construction projects with cost overruns and missed deadlines is worrying.

A final point. In a world in which nuclear threats are heightened, the expansion of enriched uranium fuels in nuclear reactors and the concomitant need to safeguard against their diversion for weapon purposes is a path that should be avoided.

5. Governments Change and Priorities Shift

The Ontario government is fully committed to the nuclear industry. In policy documents and through legislation, the current government has given priority to nuclear power.

But governments change and energy policy shifts. Prior to 2018 there was a different government in Ontario, and with that a different energy and climate plan and a different set of energy policies. The then Liberal government closed coal-fired plants and provided generous subsidies and contracts to energy firms investing in solar installations and wind generation. Those policies came to an abrupt halt when the current government was elected.

The existing government cannot imagine it will be replaced and OPG cannot imagine that a different government could have different energy priorities. It is precisely because of these political limitations that the Impact Assessment process must be more objective, more cognizant of world energy developments, more concerned by long term risks, more aware of the climate crisis and more attuned to the transient nature of governments.

Given the massive capital expenditures for building, repairing, and decommissioning nuclear plants and the long timeframes involved, the Impact Assessment process needs to think about the world in 2050, 2070 and even 2100. The NNW project will take decades to build, it is projected to operate for 70 years and then there will be decades more for decommissioning. The Ontario government doesn't have much experience with decommissioning nuclear plants. But it has been reported that the decommissioning of the damaged Fukushima plant in Japan will take 30-40 years and will cost between $150 and $180 billion (US).

The current government's infatuation with nuclear reactors should not burden future generations. Just as we need to be concerned about stranded assets, we also need to avoid energy lock-ins where future governments are committed to an energy choice long after it makes sense to be on that particular pathway. The International Atomic Energy Agency (2024) has estimated that nuclear power will account for only between 2.7% and 4.7% of the world's electrical capacity by 2050. (P 19 table 3) In Ontario the energy trajectory is skewed. According to 'Energy for Generations", the Ontario government policy paper, by 2050 nuclear will account for about 75% of our electricity supply. Renewables, on the other hand, will provide an even smaller share than at present.

Unlike the OPG, the Impact Assessment process doesn't need to be limited by the current government's energy preferences.

6. False Claims on Net Zero and Climate Impacts

OPG claims that its NNW project will help address the climate crisis. It describes nuclear reactors as producing 'clean energy'. And it commits to net-zero by 2050. "The NNW Project will also allow OPG to support Canada's goal of being net-zero by 2050." (p xxviii full report)

These are core talking points of the nuclear industry. In fact, OPG goes so far as to say: "As the global community intensifies its efforts to combat climate change, the role of nuclear energy becomes increasingly vital."

The evidence is otherwise. A few years ago, the former heads of the US, German and French nuclear regulators and the former secretary to the UK government's radiation protection committee issued a joint statement which concluded:

"Nuclear is not a practicable means to combat climate change…nuclear is just not part of any feasible strategy that could counter climate change."

The former regulators made it clear that the speed and scale needed for the low carbon transition to combat the climate crisis was well beyond the capacity of the nuclear industry. While nuclear reactors are considered low carbon, nuclear energy is out of the running because it is too expensive and takes too long to build.

In addressing the climate crisis nuclear commitments can easily become more of an impediment than a solution. There is a huge opportunity cost associated with nuclear power. It crowds out cheaper and faster-to-deploy renewables. The hundreds of billions committed to nuclear new builds is money that could bring GHG emissions down faster and cheaper through investments in solar, wind, and storage.

There is a compounding problem posed by an over-reliance on nuclear reactors. The Ontario government plans for nuclear reactors to make up 75% of electricity generation by 2050. To have an electricity grid dependent on a small number of very large producers is to invite problems. A system dependent on nuclear reactors is vulnerable to outages and shutdowns. As reactors are off line other sources of electricity generation have to be readily available to meet the shortfall.

At present this is the situation in Ontario. As nuclear reactors are off line for 'refurbishment' the Ontario government has ramped up fossil fired generating plants. As a result, Ontario's GHG emissions in the electricity sector have increased dramatically. In 2017 gas power made up 4% on Ontario's electricity. By 2030 it will be 25%. Emissions from gas fired plants are projected to increase by 400% by 2030 and 800% by 2040. In its policy paper 'Energy for Generations' the government has made a long-term commitment to the burning of fossil gas throughout Ontario's economy. Nuclear reactors might not produce a great deal of GHG emissions when they are operating but to the degree they rely on fossil gas back-ups, which is the case in Ontario, then they contribute to the growth in climate-wrecking emissions. When an electrical system becomes over reliant on nuclear power then those back-up emission risks increase.

7. 'Just Trust Me' Isn't Good Enough

OPG refuses to consider alternatives to its nuclear project but insists on the flexibility to pursue alternatives in meeting the requirements of the Impact Assessment. The project description provides few clear decisions and no detailed plans. OPG frequently refers to "alternative means to carry out the project." There is an important distinction between flexibility and indecisiveness.

Every decision, every choice, has implications for safety, security and environmental protection. Throughout the project description OPG repeatedly postpones critical decisions. For example, OPG notes that it will produce 30,000 MW of thermal energy to generate 10,000 MW of

electricity. Nuclear reactors are very inefficient ways to boil water, to make steam, to turn a turbine, to generate electricity. The waste heat is managed through cooling systems and by releasing it into the environment as thermal pollution. The choice of cooling systems has implications for the discharge of waste heat—thermal water into the lake or water vapour into the air. OPG notes that it is considering a number of alternatives for circulating cooling water.

There is a large and consequential range of issues about which OPG is not prepared to make decisions. It is not prepared to make decisions about the reactor design, the cooling system, the site layout, the site preparation plan, the construction plan, or how they will manage excavated material. OPG is not clear about how it will handle low-level waste, intermediate-level waste or spent nuclear fuel (high-level waste).

All of this matters. The choice of cooling systems will determine the height of cooling towers or the amount of heated water discharged into Lake Ontario; the site layout and preparation will have impacts on wetlands, flora and threatened species; and, the approach to nuclear waste management has serious implications for waste storage and transportation that can put populations at risk.

OPG wants the flexibility to pursue alternative means of doing many things but it doesn't provide any assessment of the specific impacts of the various alternatives. When it comes to nuclear plants every alternative has to be assessed on its specific impacts.

The process of an Impact Assessment is too constrained if the impacts are too generic and the assessment too broad. If OPG hasn't made the required decisions about how to proceed then the process of the Impact Assessment is premature.

8. Vulnerable Species at Risk

In 2021, the Ontario Nature charitable organization celebrated 90 years "of protecting wild species and spaces" by recognizing the "exceptional contributions to natural habitat protection made by organizations, individuals and companies." The Ontario Nature Corporate Award was given to Ontario Power Generation – Wesleyville. The award recognized the "numerous initiatives aimed at improving nature conservation, including restoration activities at Wesleyville Creek that benefit brook trout; monitoring and research at the Wesleyville coastal marsh; the bluebird, tree swallow and wood duck nesting-box project; and its osprey platform program."

The NNW risks reversing all the species and spaces protection that prompted the 2021 award.

According to OPG's "Summary of the Initial Project Description," part of the NNW site is designated as a Regional Life Science Area of Natural and Scientific Interest (ANSI). Its central marsh includes the Chrysler Point Provincially Significant Wetland (PSW). A portion of the marsh is also designated as a Regional Life Science ANSI.

Breeding bird surveys of the NNW site have identified over 100 species of birds "that are either confirmed, probable or possibly breeding" within the site or surrounding area. The OPG report notes that, because the site is on the Lake Ontario shoreline, "it represents a location that would provide habitat for migrant birds that cross the lake in the spring (making first landfall) and again in the fall." Numerous species of mammals have been recorded in the area of the site, while it is noted that the site provides ideal habitat for all eight of the bat species that live in the province. Six breeding amphibian species have been observed and two turtle nesting areas documented. The areas of open meadow on the site provide habitat for migrant butterflies, "functioning as stopover areas, before carrying on along their migration route."

Multiple Species at Risk (SAR) have been documented at the site. The bird SARs identified include the Eastern Meadowlark, Bobolink, Wood Thrush, Grasshopper Sparrow, and the threatened Least Bittern. Other SAR species include the Common Snapping Turtle, the Midland Painted Turtle and the Butternut tree. The Monarch butterfly is a site SAR of particular note. Although the Monarch is considered only of "Special Concern" in Ontario, the federal government listed the butterfly as an endangered species in the federal Species at Risk Act (SARA) in December 2023. Under SARA, "it is illegal to kill, hurt, or catch a Monarch (or Monarch caterpillars, eggs or chrysalises) when you are on land owned and/or administered by the federal Government of Canada."

The OPG summary report notes that "detailed field studies will be needed to determine the occurrence and habitat use by SAR." The report avoids any discussion of how or when those studies would be conducted and to what extent the results of the studies would influence the NNW project. It is apparent based on the rich biodiversity present that a comprehensive field study would identify the substantial risk of adverse impact that a large construction project would have on year-round inhabitants and migratory bird, mammal and insect species at the Wesleyville site.

9. NNW's Nuclear Waste: Management or Mismanagement?

Port Hope, the location of the proposed NNW, has a long, difficult history with nuclear waste. Local residents have spent decades struggling with the effects of Eldorado Nuclear's radium refining, uranium conversion and the toxic waste that was left behind. This waste contains such hazardous substances as uranium, thorium, radium, and arsenic.

In the 1970's radon was discovered in homes and buildings. Public advocacy efforts through the 1990s led to a federal effort to remove soil and remediate buildings and residential properties. A process that is still underway. The hazardous material is being stored in an engineered mound, the size of 70 hockey rinks. It will be there for 500 years.

Advocates criticize the storage solution and continue to call for independent health monitoring to address the elevated health risks.

Nuclear Waste at NNW

The nuclear industry produces waste from uranium mining and milling operations, as well as low, intermediate, and high radioactive waste.

The NNW will produce Low-level waste. This is waste composed of items that are contaminated such as paper, clothing, cleaning tools, and decommissioned parts. This waste is compacted and incinerated at a waste facility at the Bruce Nuclear site. The residue requires containment for several hundred years.

Intermediate-level nuclear waste, will also be produced by NNW. This requires isolation and containment for longer than several hundred years. It is typically contained in steel-lined in-ground storage containers on-site by its producers.

High-level waste is primarily spent nuclear fuel, in the form of fuel bundles. These remain a health threat for many thousands of years. Spent fuel requires a 6-10 year period of cooling in thick concrete pools of water, and is then placed in dry storage vaults at the sites where it is produced.

As of June 30, 2024, in Canada, a total of approximately 3.3 million used CANDU fuel bundles were in temporary storage at the reactor sites. The Ontario government's plans to build new reactors at Darlington, Bruce and at Wesleyville will dramatically increase the number of spent fuel rods.

OPG is unsure of its plans for managing the NNW nuclear waste. In the project description it refers to a "potential waste facility". It goes on to say it is exploring options and there may be something on site or somewhere else.

"OPG is considering future options for the interim storage of L&ILW and spent fuel on-site or in an off-site licensed facility."

The project description lists a variety of possible scenarios for low-level and intermediate level waste, including interim storage on site, transportation to another site for processing then return to site for interim storage, disposal in a permanent disposal facility, and "any combination of the above alternatives, including the use of multiple alternatives in sequence."

In other words, OPG doesn't have a plan.

The MS-WTFN have argued that the impact assessment ought to address how nuclear waste will be managed, stored and transported, both in the short and long term. Deferring these matters to future decisions or regulatory processes, would limit the ability to fully assess real and potential impacts.

Canada has assigned responsibility for management of spent nuclear fuel to the industry-controlled Nuclear Waste Management Organization, (NWMO), which plans to build a deep geological repository.

Canada has also assigned the NWMO with responsibility for intermediate level and non-fuel high-level radioactive waste. The NWMO's plan for this waste is to build a second deep geological repository. Potential fuel from new nuclear projects may also be managed in the second repository.

There are no such deep geological repositories in existence anywhere in the world. It is an untested, unproven concept.

The NWMO selected a site 40 kilometres outside of Ignace, Ontario for its first repository. After receiving millions of dollars from NWMO, Ignace approved the site even though it is not within its township or its watershed. The area being considered is in the Revell Lake area, an area which "spans the headwaters of two watersheds: the English Wabigoon watershed and the Rainy River/Lake of the Woods watershed. Combined, these watersheds connect with Kenora's water supply, Winnipeg's water supply, many northern Ontario First Nations communities, and eventually Hudson's Bay - and every precious lake and waterway in between."

The plan is to transport the nuclear waste as much as 1,800 kilometres from the current locations, by truck, often on two-lane roads, or by rail. Scientists have pointed out the risks, ranging from accidents, theft, and serious health concerns, of transporting nuclear waste.

A separate IA process was recently concluded for the deep geological repository. In spite of the many serious issues associated with the transport of nuclear waste, NWMO excluded this aspect from the project description.

OPG's NNW proposal highlights key risks of nuclear waste, but fails to address them. Ontario already has an enormous and growing problem with nuclear waste, a product that is so deadly, and so long-lived that its safe containment becomes a crushing multi-generational burden of responsibility. Over its lifetime, NNW will create a mammoth amount of spent nuclear fuel that must be safely managed, but OPG fails to describe a clear plan for addressing this or the various other types of nuclear waste that will be created. And OPG's reliance on the NWMO deep geological repository, a scheme that has already demonstrated serious safety flaws, is worrisome.

Elsewhere the OPG has stated "the easiest waste to manage is the waste that was never created in the first place." That sounds like a better plan for the NNW site.

10. Consultation is not Free, Prior and Informed Consent.

In the forward to its project description OPG states that "in the spirit of collaboration and reconciliation, OPG has **invited** the MS-WTFNs to provide their perspectives into this Initial Project Description (IPDD).... While OPG does not necessarily endorse the interpretations of Canadian law advanced by the MS-WTFNs, OPG values their contributions **and** looks forward to continuing our conversations to better **understand** the NNW Project's real and potential impacts on their Rights." (emphasis added)

Just as official land acknowledgements can be formal and token so can consultations. OPG has provided space for the MS-WTFN to express their views throughout the project description in the full report. But nowhere do those perspectives appear to have influenced decisions or outcomes. WTFN have flagged numerous concerns, raised many cautions and have identified 'real and potential' adverse impacts of the NNW project. There is a long list of questions about process, safety and protection of people, animals, plants, insects, water, and land.

OPG has proceeded with consultations in their own way - focused workshops to garner input and feedback, monthly meetings to discuss key issues and priority areas, draft and schedule sharing for input and feedback, a SharePoint site, requesting MS-WTFNs 'participation in ongoing field studies and weekly field work summaries.

MS-WTFN are concerned that negotiations do not involve genuine Nation-to-Nation dialogue. They have pointed out that consultation is not about retroactive validation or catching up on decisions already made. It must be proactive, interactive, and continuous from the outset and throughout all phases of planning, assessment, decision-making, implementation, and follow-up. They have argued that adequate funding, technical support, and flexible, co-defined timelines must be in place to enable full MS-WTFN involvement throughout the process.

Throughout the project description there are numerous occasions where OPG's views, values and attitudes are seen contrasted against Indigenous ways of knowing, being and honouring and their obligation to protect Mother Earth and all its inhabitants. The views are not often aligned.

The MS-WTFN have raised many concerns and have suggested numerous ways to improve the Impact Assessment and OPG's consultative process. They have expressed concern that their contributions will be treated simply as commentary and will be arbitrarily truncated by regulatory timelines and compartmentalized decision-making.

They have identified the need:

- for an MS-WTFNs-led Impact Assessment with support and funding.

- to involve third parties, who have the necessary expertise, to ensure that MS-WTFN can evaluate information through an independent western lens. Adverse impacts and effects may not be fully captured by conventional western structured assessments.
- to explore onsite long-term storage of nuclear waste as part of the Impact Assessment, due to the uncertainty of an offsite long-term storage solution.

They have expressed concern about the:

- lack of a guarantee to future inclusion in decision making, oversight, monitoring, and completion of studies over the nuclear plant's life span, if it is built.
- lack of opportunity to directly oversee operations now and throughout its lifecycle.
- lack of a guarantee be involved in monitoring and compliance verification guided by indigenous values beliefs values, and responsibilities to future.
- inadequate time for thorough deliberation and decision-making.

They have pointed to:

- real and potential adverse impacts and effects on waters, lakes, wetlands, creeks, groundwater, and the many Relatives who depend on them as well as air quality and increases to air pollutants associated with the NNW Project.
- restrictions to Relatives' foraging grounds, nesting and breeding grounds, changes to their landscapes leading to disturbed migratory patterns, and disruptions to their relationships with the Lands, Waters, and all Relatives.
- real and potential adverse impacts and effects related to decommissioning activities, interim and long-term management, storage, and transportation of nuclear waste.
- MS-WTFN's right to self-determination with respect to the current existing nuclear safety and emergency preparedness regime.

The proposed NNW site is on Lake Ontario. MS-WTFN is claiming jurisdiction over the Lakebed of *Gchi Nibi* as Lake Ontario lakebed is unceded. When OPG noted that it was not considering any alternatives to the building of nuclear reactors the MS-WTN countered by suggesting the Lands, Waters and all Relatives within the NNW site be returned to their communities.