

The NWMO document entitled Initial Project Description Plain Language Summary – English begins with a section titled “Acknowledgment of Truths.” This sets Truth and the Acknowledgement thereof as the standard on assessing the NWMO’s work thus far and as presented.

On page v, the NWMO states:

“The Project provides a safe, permanent, and responsible solution that will ensure the used fuel is securely contained and isolated from people and the environment for generations to come.”

Is this a statement of Truth or of Hope?

The section Acknowledgement of Truths contains statements which the NWMO and others can easily recognize as demonstrably true, such as

- The National Inquiry into Missing and Murdered Indigenous Women and Girls;
- Section 35 of the Constitution Act;
- “that there may be unresolved claims between First Nation and Métis communities and the Crown to be considered in relation to the Project site”;
- “that the federal acts which it is subject to, Nuclear Fuel Waste Act, the Nuclear Safety and Control Act (Government of Canada 1997) and the Impact Assessment Act (Government of Canada 2019), are being imposed on Indigenous Peoples as a result of Canada’s plan.”

The Statement that the proposed Project “provides a safe, permanent, and responsible solution that will ensure the used fuel is securely contained and isolated from people and the environment for generations to come” is not something everyone can recognize as demonstrably true. There is no operating deep geological repository operating anywhere in the world (or even licensed or approved for operation) despite multiple countries having pursued this option over the last five decades. Technical and scientific uncertainties persist, with some countries having abandoned or paused their pursuit, and others making slow or limited progress. This should temper the confidence expressed by the NWMO. If the NWMO had

acknowledged these truths, then they would have written something more like this: “we contend and are confident that we can demonstrate that the proposed Project can provide a safe, permanent, and responsible solution...”

If the NWMO, as the proponent of this Project, was committed to acknowledging truths, they would not exclude from the Project the “transportation of used fuel from reactor sites to the area in question beyond primary and secondary access roads to the project site.” (page vii)

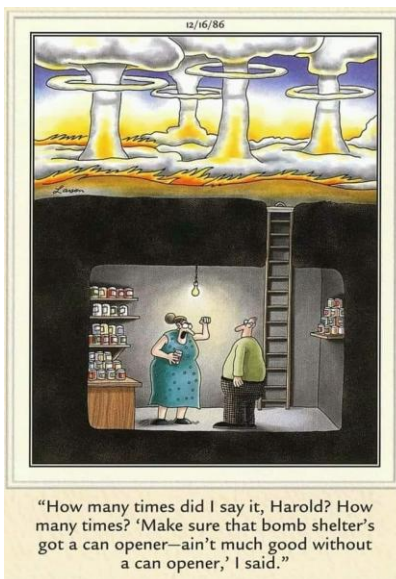
From the founding of the NWMO through to the publication of this document, they have always included the matter of transportation of the used fuel waste from reactor sites to the site in question as part of their community engagement process. Now that they are excluding this all-important matter, it appears that they have not been telling the truth and have not been acting in good faith throughout the history of the organization’s existence. If they are committed to acknowledging truths then they would not be excluding the transportation of the used fuel from the reactor sites to the proposed project site in this document. This insult to the Canadian people must not be allowed to stand.

Without it being part of their Project Description, they are in fact asking for the actual Project to not be assessed. The Project as presented for decades is the movement of the used reactor fuel bundles from their present locations to another single location for longer-term “permanent” storage. The movement of these materials, the transportation, is the project. It is deceptive to argue otherwise at the best of times, but even more so after two decades of presenting this very thing to Canadians.

The truth of the matter is this: it is senseless to assess the end point of this process without first assessing the middle-point of the process, the transportation of the used fuel waste from the nuclear reactor sites to the proposed site in Northwestern Ontario. It is disingenuous to assess the last part of the project if the earlier parts of the project have not been satisfactorily assessed. This is especially true since there is no demonstrable proof from any efforts anywhere, let alone in Canada, that

shows that the movement of such materials can be done safely, either by transport truck or by rail in such large volumes over such a long period of time and under the travel conditions such as in northern Ontario (and along routes from eastern Canada)

Therefore, it is our recommendation that this Assessment should not proceed until such time as all matters related to the transportation of these materials are thoroughly assessed and demonstrated to be safe and acceptable both from a technical and a social perspective. It simply must be done first. It makes no difference whether this is a matter for the CNSC or Transport Canada or a combination thereof to lead the Impact Assessment process. First things are first. What is presented by the NWMO in their Initial Project Description is not what is first, and therefore it needs to be rejected. Full stop.



The other truths that need to be acknowledged, particularly because they relate to the transportation of used nuclear reactor fuel across the country, are the matters which flow from the following statement made by the NWMO:

“If implemented, the Project would ... support Canada’s commitments to climate action and achieving net-zero by 2050 by ensuring nuclear energy remains a sustainable and socially responsible energy source.” (page vi)

Whether or not this proposed project can succeed in helping Canada achieve its 2025 net-zero target is immaterial to this discussion. Rather, what concerns us here is what this statement reveals, namely, that if this Project as described is implemented (and assuming the wastes are then transported to the site in question) then it will allow for even more of this dangerous waste to be produced in even more locations in Canada than where it is presently being produced and stored. This includes, as proposed, southern Saskatchewan and northern Alberta. If it is true that this Project is in support of the continuation and expansion of nuclear power in Canada, then it would make sense and be more truthful that before there is any further expansion of the industry, this project – including the transportation of said wastes from present and potentially future locations – be assessed and demonstrated to be safe and acceptable both from a technical and a social perspective. Further, any expansion of the nuclear industry should be subject to a strategic impact assessment prior to any project-specific assessments (such as already underway for Bruce C, Peace River and Wesleyville nuclear projects).

All of that said, the fact that the Canadian nuclear industry and its institutional supporters are proceeding with the continuation and expansion of the use of nuclear reactors for the production of electricity without this assessment being successfully completed (or the site built and operational) exposes this statement in the NWMO document to be the falsehood that it is. The Nuclear Industry does not care and has never cared about what to do with these long-lived radioactive wastes. If they cared, they would have had a “rock-solid” plan back in the 1950’s. Their present expansionist behavior reveals the same truth: it makes no difference to them whether or not this Project ever proceeds. The NWMO claim that it is important for the nuclear industry further erodes our confidence in the NWMO as a credible

proponent for this Project, both as they describe it now or as it should be described per the above comments.

Given this, how can we trust the NWMO to undertake the endeavour? Assessment of a project includes an assessment of the proponent and not just what they propose. It is the NWMO itself which is under scrutiny here, and so far, based on their own standard of “acknowledging truths,” within the first vii pages they have missed the mark.

In *The Last Battle*, the final book in “The Chronicles of Narnia,” C.S. Lewis presents how evil operates. Evil operates by using the truth in such a way that it serves a lie. The NWMO must be required to present everything truthfully. Otherwise, this Impact Assessment Process becomes vulnerable to becoming a vehicle for the propagation of lies. To avoid this, the NWMO must be required to include the matter of the transportation of these wastes, both those in existence and those planned on being produced. As well, any reference to Canada’s commitments to climate action and achieving net-zero by 2050 need to be removed from any further documentation produced by the NWMO in this process.

Thank you for your consideration of our reflections, comments, and suggestions.

Submitted February 3, 2026 by

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