Enclosure 1: Federal Authority Advice Record (FAAR) - Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project
Registry File: 88774

Please submit the completed form by **February 4, 2026** via email to nuclearwaste-dechetsnucleaires@iaac-aeic.gc.ca[1]. In order to be posted on the Registry, and to align with the Official Languages Act, IAAC is requiring that you submit the FAAR form, or a summary of it, in French and English.

Department/Agency Contact Information

Submission Date	February 4, 2026
Department/Agency	Health Canada
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Review the draft Initial Project Description and answer the following questions:

1. Is your department or agency in possession of specialist or expert information or knowledge in its area of expertise that may be relevant to the conduct of an impact assessment of the project?

   Specify the specialist or expert information or knowledge.

   Yes, Health Canada is in possession of specialist or expert information or knowledge in its area of expertise that may be relevant to the conduct of an impact assessment of the project.

   As a federal authority, Health Canada will provide specialist or expert information and knowledge in the Department's possession (expertise) to support the assessment of impacts on human health from projects considered individually or cumulatively under the Impact Assessment Act (IAA). It should be noted that expertise related to assessing human health that is relevant to impact assessment (IA) may be held by other federal, provincial, and municipal partners, reflecting the shared jurisdiction for environmental and human health within Canada. For example, the Public Health Agency of Canada (PHAC) has expertise in the social determinants of health approach and health equity, and may provide that expertise through Health Canada, upon request from the reviewing body(ies). How the expertise provided by Health Canada and PHAC will be used in the IA process will ultimately be determined by the reviewing body(ies).

   Health Canada can provide human health expertise in the following areas:
   • Air quality;
   • Recreational and drinking water quality;
   • Country foods;
   • Noise;
   • Methodological expertise in human health risk assessment;
   • Electromagnetic fields;
   • Radiological emissions; and,
   • Public health emergency management of toxic exposure events.

   Does your department or agency have additional information or knowledge on the project not specified above, including information on the geographic, environmental, economic or social context of the project? (e.g. location of protected or sensitive areas, previous history between local communities and proponent or similar projects, local or regional social or economic concerns)?

   No, Health Canada does not have additional information or knowledge on the project not specified above.

2. Will your department or agency exercise a **power, perform a duty or function**, or provide **financial assistance**, related to the project to enable it to be carried out in whole or in part?

   As relevant,
   a) Specify the power, duty or function, or financial assistance, and the likelihood that it will be required to construct the project, as either Required, Potential, Likely, Unlikely or Not Required
   b) Describe any associated Indigenous or public consultation, including timelines, and elaborate on any potential opportunities for consultation coordination with the impact assessment process, if an impact assessment is required
   c) Describe any associated information requirements (e.g., alternative means assessment, habitat offsetting), and specify those that may be coordinated with the impact assessment process, if an impact assessment is required
   d) Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide
   e) Indicate whether your department or agency has identified any power that it will not be exercising or may be unable to exercise to allow the project to be carried out, in whole or in part, with reasons; if unsure, explain what must be resolved to increase confidence.

   No, Health Canada will not exercise a power, perform a duty or function, or provide financial assistance related to the project.

3. **Using Table 1**, identify project- and context-specific **key issues** based on the expertise within your mandate[1] and the information in your possession. Available information may include your access to databases and corporate knowledge, the draft Initial Project Description, any exchanges with the proponent or others related to the project and known means to address the effects.

   For each key issue:
   a) Specify the key issue (e.g., specific species and location)
   b) Specify the project component or activity linked to the key issue
   c) Explain why it is a key issue based on:
      i. biophysical effect pathway(s) from the specific project component or activity
      ii. concerns unique to the project or a priority within your mandate
      iii. the issue being material[2] to decision-making under the *Impact Assessment Act*
   d) Potential pathways from key issues that could lead to an impact on Indigenous Peoples and their rights
   e) Identify how the issue could be resolved, including through other means than an impact assessment (e.g., other regulatory oversight)
   f) Identify additional information the proponent could provide to build confidence about how the issue could be addressed through other means

   DGRs are proposed in geology chosen for its technical suitability for containing radioactive waste. The proponent's proposed DGR would permanently contain 5.9 million bundles of used nuclear fuel, which will remain radioactive for thousands of years. It will be important to ensure the DGR's barriers designed to prevent releases are stable over the long-term. Adaptive management will be an important consideration to ensure adverse effects are avoided or minimized over the long term.

   Key issues will vary depending on the phase of the project. According to the proponent's IPD, the site preparation and construction phases of the project are anticipated to take 13 years (planned over 2030-2042). Placement of nuclear waste into the repository will begin in the operations phase scheduled in 2043 and anticipated to occur over 50 to 60 years. Once operations are complete, there would be an approximate 100-year phase of extended monitoring, decommissioning and closure. The site would then be decommissioned and closed and the proponent would eventually apply to be released from CNSC licensing. The site would transition into the institutional control that would be established by the Government of Canada and the Province of Ontario.

[1] Refer to the Memoranda of Understanding with IAAC.
[2] An issue is material to decision making if its analysis is anticipated to affect the conclusions on (1) whether adverse effects within federal jurisdiction or direct and incidental adverse effects (collectively adverse federal effects) are likely not significant, or of low, medium or high significance; (2) appropriate mitigation measures for significant adverse federal effects; or (3) justification in the public interest.

During the operations phase and extending into the decommissioning and closure phase of the Project, the potential for radiological releases from the Project as well as malfunctions, accidents, and malevolent acts will be key considerations.

IAAC has prepared the following **preliminary list of potential effects that are likely to be key issues** for the integrated assessment.[4] While completing **Table 1**, IAAC requests that, as appropriate based on your department or agency's mandate and expertise, you validate this list, add precision or rationale where appropriate, and recommend any additional key issues for consideration. For a federal work or undertaking, such as nuclear energy works, a broader range of effects are within federal jurisdiction, including socio-economic effects.

- Effects to Biological Environment: vegetation (terrestrial, riparian and wetland environments), wildlife, reptiles and amphibians, fish and fish habitat, birds, species at risk
- Effects to Physical Environment: geology and geochemistry, soils and sediment, ambient radioactivity, air quality/emissions, surface water quality/quantity, groundwater quality/quantity, effects to Lake Ontario
- Accidents and malfunctions and effects of the environment on the project
- Impacts to Indigenous rights, current use of lands and resources for traditional purposes, physical and cultural heritage of Indigenous peoples and sites of archaeological importance, with a focus on potential archaeological resources on land or water, and species of cultural importance
- Effects to the health, social and economic conditions and the positive and negative consequences of these changes that are likely to be caused by the carrying out of the designated project

Kitty Ma
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Environmental Health Program
Regulatory Operations and
Enforcement Branch

Name of Departmental / Agency Responder

February 4, 2026

Date

Table 1: Key Issues to inform the integrated assessment process

This table should outline key issues to inform the integrated assessment process, including whether an impact assessment is required and, if so, the scope of the assessment and tailoring of the Tailored Impact Statement Guidelines.
Key issues are the major concerns directly related to a project component or activity, the analysis of which is anticipated to be material to decision-making under the *Impact Assessment Act*.
Federal authorities' advice should be guided by the identification and resolution of key issues. If an impact assessment is required, it will be focused on key issues.

Comment ID	a) Key issue	b) Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Impacts on Indigenous Peoples and their rights	e) Means for issue resolution	f) Additional information from the proponent
Identify each comment by your organization's acronym and a sequential comment number. *e.g.: IAAC-01*	*Specify each key issue (e.g., specific species and location).*	*Identify the project component or activity linked to the key issue.* *Be specific about the nature, scale, novelty and complexity of the component or activity.*	*Identify the specific effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).*	*Describe why it's a key issue within the mandate of your department or agency, including in terms of priorities of the federal government and in terms of anticipated likelihood, severity or uncertainty of effects.* *Identify if the key issue is common for project activities of this nature or in this sector, or whether it is unique to this project due to the project's complexity, size or novelty; a sensitive or rare receiving environment; and/or proximity of sensitive environmental or human receptors (including Indigenous Peoples).*	*Describe why the key issue is material to decision-making as either:* • *an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including:* ○ *federal experts' knowledge and experience with past project assessments;* ○ *presence of sensitive species, habitats or human receptors (including Indigenous Peoples);* ○ *novel or complex project activities, components or technologies;* ○ *high uncertainties in effects or in the effectiveness of mitigation measures;* ○ *unknown or unproven mitigation; or* • *a factor for the justification in the public interest anticipated to be material to decision-making such as a likely positive effect contributing to sustainability, to Canada's environmental obligations or climate change commitments or in supporting governmental priorities, such as reconciliation with Indigenous Peoples.*	*Describe how key issues you have identified within your mandate and expertise may lead to impacts on Indigenous Peoples and their rights.* *This advice must be informed by knowledge and input from Indigenous Nations and communities during the comment period, or within the Initial Project Description to support a more accurate, respectful and collaborative assessment.*	*Describe how the key issue could be resolved or addressed by:* • *Any means, including powers, duties, functions, frameworks, policies or guidance for which your department or agency is responsible;* • *Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province;* • *Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or* • *Commitments made by the proponent (e.g., in the Initial Project Description).*	*Describe information the proponent could provide, or commitments the proponent could make, that would provide confidence that the issue can be resolved by existing means (to be considered for the final Initial Project Description, future Summary of Issues and response, or (potential) Tailored Impact Statement Guidelines.* *Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.*

Health Canada agrees with the validity of the key issues listed on page 3 of the FAAR and has not identified any additional key issues for consideration. Although radioactive emissions to the environment are a human health concern, it is not necessary to identify these as a major concern for the purposes of developing the Tailored Impact Statement Guidelines. The Canadian Nuclear Safety Commission's regulatory and licensing process already require that the proponent predict, mitigate, and monitor radioactive contaminant releases to ensure that they stay within legislated levels.