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	Fisheries and Oceans Canada
Lead Contact, Title, Work Unit	Colby Nolan, Fisheries Protection Biologist, Coastal and Marine Regulatory Review Unit
Email, Phone	Colby.Nolan@dfo-mpo.gc.ca , 416-919-4615
Alternate Contact, Title, Work Unit	Elyjah Schimmens, Senior Biologist, Coastal and Marine Regulatory Review Unit
Email, Phone	Elyjah.Schimmens@dfo-mpo.gc.ca 289-795-7437

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.

Answer: Yes, DFO's specialists have expert information and knowledge linked to its legislative and regulatory responsibilities under the *Fisheries Act* and *Species at Risk Act*. DFO specialists also have expert information and knowledge of fish and fish habitat, including aquatic species at risk, and expert knowledge on the assessment of impacts to fish and fish habitat. This includes but is not limited to assessing the adequacy of sampling that has been conducted to describe the baseline environment and making comparisons to post-impact outcomes, and whether the avoidance, mitigation, and offsetting measures proposed by the proponent are appropriate and adequate.

   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)?

   Answer: No.

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

Answer: Power: Fisheries and Oceans Canada may exercise its statutory power to issue a *Fisheries Act* authorization or a permit under the *Species at Risk Act* in relation to the project. The exercise of this power is considered 'Potential' and depending on whether the project results in impacts to fish, fish habitat, or SARA listed species.

   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

Answer: If a *Fisheries Act* authorization is required for the project, Fisheries and Oceans Canada would have a Crown duty to consult Indigenous groups whose potential or established Aboriginal or treaty rights may be adversely affected. The scope and depth of consultation would be determined on a case-by-case basis, informed by the nature of the project and the potential adverse effects on rights.

Consultation would occur prior to a decision on any required authorization. At this stage, consultation timelines cannot be determined. Where an impact assessment under the Impact Assessment Act is required, Fisheries and Oceans Canada would seek to coordinate consultation activities with the impact assessment process.

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

Answer: The Fish and Fish Habitat Protection Program of Fisheries and Oceans Canada (DFO) requires detailed information about the proposed works, undertakings and activities that have the potential to cause harmful alteration, destruction and disruption to fish and fish habitat, cause impacts to species at risk and their habitat. Information includes but is not limited to: preliminary design/engineer drawings/concepts, associated footprints, photos and baseline biological and physical indices (habitat, substrate, depth etc) from potentially impacted watercourses/waterbodies, detailed mitigation and monitoring plans. DFO requires this information to determine whether a *Fisheries Act* authorization or Permit under the *Species at Risk Act* would be required. Should a *Fisheries Act* Authorization be required, then DFO would require a fisheries offsetting plan to counterbalance the impacts to fish and fish habitat resulting from the proposed works. The above information can be coordinated with the impact assessment process, should the impact assessment be required.

d) Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide

Answer: DFO requires detailed information about the work(s) proposed (preliminary design drawings/concepts), associated footprints, and photos of potentially impacted watercourses / waterbodies at the locations of the impacts to fish and fish habitat in order to assess what regulatory instrument that may be required (*Fisheries Act* Authorization, Letter of Advice, *Species at Risk Act* permit). Further information collection guidance is expanded on in Table 1 below. The two figures below were included to help with this guidance. DFO also has several codes of practice that may be used by the proponent, where appropriate.

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.

Answer: At this time, there does not appear to be a reason why the project could not be carried out should the appropriate avoidance and mitigation measures to limit impacts on fish and fish habitat be applied. For any residual impacts to fish habitat that may exist after implementation of avoidance and mitigation measures, fisheries offsetting may be required under a *Fisheries Act* authorization. Therefore, FFHPP may not exercise the power of requiring a *Fisheries Act* authorization or a *Species at Risk Act* permit.

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

[1] Refer to the Memoranda of Understanding with IAAC.

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.

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

[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.

Mark D'Aguiar,
A/Team Lead, Fish and Fish Habitat Protection Program

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.

DFO-01	**General comment**- the potential for the project to cause the harmful alteration, disruption, or destruction of fish habitat	Site preparation and construction	**General comment - Impacts to fish and fish habitat**	**General Comment:** DFO's review focuses on fish and fish habitat within or adjacent to waterbodies and watercourses that may be directly or indirectly affected by the project, including any hydrologically connected watercourses or waterbodies downstream that could experience project-related effects. While the Initial Project Description (IPD) includes fish and fish habitat information at a broader, scale, DFO–FFHPP's focuses on potential project-specific impacts within the project footprint and areas where project activities may directly or indirectly result in the death of fish or the harmful alteration, disruption, or destruction of fish habitat. As expected in the initial project description phase, the exact magnitude, nature, and ability to mitigate direct and indirect impacts are not fully understood. The IPD does not provide sufficient project-level detail to identify all potential impacts to fish and fish habitat. Without additional information on fish and fish habitat at each impacted waterbody/watercourse,	**General comment**: The project has the potential to result in the harmful alteration and/or destruction of fish habitat as a result of the project footprint, potentially resulting in direct and indirect (i.e., flow changes), negative impacts to fish and fish habitat. DFO requires detailed information about the proposed works, undertakings and activities that have the potential to cause harmful alteration, destruction and disruption to fish and fish habitat, as well as detailed information of the avoidance and mitigation measures that will be applied to determine the level of residual effects that remain and whether a *Fisheries Act* authorization or Permit under the *Species at Risk Act* would be required for the project. DFO's offsetting requirement allows for mitigation of remaining residual effects on fish and fish habitat.	Any potential adverse effect on fish and fish habitat from a work, undertaking, or activity also has the potential to impact Indigenous rights.	Operational guidance is available for proponents on DFOs website: Projects near water. DFO has standard mitigation measures posted on its projects near water website: https://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html. Additional analysis typically leads to the generation of site-specific measures in addition to standard measures. DFO encourages the proponent to explicitly consider the mitigation hierarchy, avoid and mitigate to the extent possible prior to considering the need to offset. DFO also has Codes of Practice posted that specify conditions and measures to manage risks to fish and fish habitat. They are designed for routine projects. DFO encourages the proponent to consider following Codes of Practice where applicable. Codes of practice for routine projects	To build confidence about the management of potential effects to fish and fish habitat, DFO suggests that the proponent should take the following steps to inform a full understanding of the Project's potential effects on fish and fish habitat: • Use of a Pathways of Effects approach to determine potential effects : https://www.dfo-mpo.gc.ca/pnw-ppe/pathways-sequences/index-eng.html • Identify whether additional site-specific avoidance and mitigation measures can be implemented utilizing the standard measures to avoid and mitigate impacts to fish and fish habitat. DFO emphasizes the importance of the mitigation hierarchy and the need to avoid and mitigate to the extent possible prior to considering the need to offset. DFO encourages the proponent to explicitly consider this approach in their planning processes • identify all residual effects on fish and

				including potential flow changes, DFO will be unable to fully characterize and understand the extent of potential effects on fish and fish habitat , and whether these effects can be effectively avoided and mitigated. Further refinement of potential effects would be informed by more detailed project information as it becomes available. However, the project has the potential to result in the harmful alteration and/or destruction of fish habitat as a result of the project footprint, potentially resulting in direct and indirect (i.e., flow changes), negative impacts to fish and fish habitat.				fish habitat, through a detailed accounting of potential effects and proposed mitigation measures; • Prepare a list of all waterbodies and watercourses (permanent and intermittent) that may be directly or indirectly affected by the project and provide: - type of water body or watercourse; - size and depths of the waterbody or watercourse - streamflow types and characteristics; - substrate type, vegetation and anthropogenic barriers to fish; - description of any proposed water work; - for each crossing, describe the anticipated method of crossing. • Provide a more detailed map of waterbodies/courses that will be directly impacted by the project footprint.

								• Provide a list of fish species likely to be present in each watercourse, including aquatic species at risk, and provide the location and description of suitable or potential habitat for these species (residence and critical habitat) in or near the project study area. - Characterize the fish-bearing status of a watercourse (e.g., occupancy), in particular in habitat suspected of being fishless, using sufficient lines of evidence. • Provide a habitat use or suitability evaluation for fish present and habitat function (e.g. spawning, nursery, growth, prey, invertebrate population, food availability, foraging, migration, cover habitat, thermal and overwintering habitat, etc.) and sensitive times for these activities

								• Describe the extent of riparian disturbances associated with construction. • Develop site specific mitigation measures that detail the conditions on which crossings of watercourses and riparian areas would be restored and maintained after construction of the project. • Engagement with Indigenous communities and include traditional knowledge when evaluating watercourses for fish and fish habitat.
DFO-02	Culvert potentially present/required under the "excavated rock management area road" – see Figure 2	Site preparation and construction	Impacts to fish and fish habitat	DFO notes the potential presence of a watercourse under the existing road where the "excavated rock management area road" is proposed to be constructed at the southwestern extent of the project footprint. It is unclear whether an existing culvert is present. And if so, whether the culvert will need to be replaced as part of the project works.	Potential adverse effect on fish and fish habitat from a work, undertaking, or activity as a result of potential flow changes, flow diversion due to watercourse crossing design.	Any potential adverse effect on fish and fish habitat from a work, undertaking, or activity also has the potential to impact indigenous rights.	Fish habitat assessment on the functions of this watercourse is required. Photos of the habitat would be an important part of this. If applicable, design consideration should be considered to ensure adequate flows are retained, minimizing downstream flow impacts, and to provide fish passage. DFO has standard mitigation measures posted on its projects near water website: https://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html	Photos of the watercourse where the road crosses over. Footprints of any proposed work in/near water. If applicable, designs for the culvert required.

DFO-03	Watercourse in the southwestern extent of the project footprint of the “excavated rock management area (ERMA)” – see Figure 2	Site preparation and construction	Impacts to fish and fish habitat	There appears to be one watercourse in the southwestern extent of the “excavated rock management area (ERMA)” footprint. It is unclear to DFO whether this watercourse will be overprinted or require realignment.	Potential adverse effect on fish and fish habitat from a work, undertaking, or activity. The project could result in the harmful alteration of fish habitat through a change in surface water flows from overprinting or diverting watercourses or waterbodies and groundwater flows.	Any potential adverse effect on fish and fish habitat from a work, undertaking, or activity also has the potential to impact indigenous rights.	Fish habitat assessment on the functions of this watercourse is required. Photos of the habitat would be an important part of this. If applicable, the design for the realignment or the infill is required. DFO has standard mitigation measures posted on its projects near water website: https://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html	Photos of the watercourse. Proposed work in and around the watercourse. Footprints of any proposed work in/near water. If applicable, designs for the proposed work. Additional detail that would help understand the scale and scope of impacts could include fish species distribution in watercourses/bodies that may be affected.
DFO-04	Watercourses where the “secondary access road” crosses over – see Figure 2	Site preparation and construction	Impacts to fish and fish habitat	The “Secondary Access Road” appears to have one location where an established road crosses over a watercourse in the southwestern section of this road and four watercourse crossings where new road requires installation. Three of these appear to go over tributaries and one goes over the Revell River based on imagery.	Potential adverse effect on fish and fish habitat from a work, undertaking, or activity.	Any potential adverse effect on fish and fish habitat from a work, undertaking, or activity also has the potential to impact indigenous rights.	Fish habitat assessment on the functions of each watercourse is required. Photos of the habitat would be an important part of this. Designs for each crossing would be required. DFO has standard mitigation measures posted on its projects near water website: https://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html	Photos and map of each watercourse. Footprints of any proposed work in/near water. Designs for each crossing.
DFO-05	Watercourses where the “transmission line” crosses over – see Figure 2	Site preparation and construction	Impacts to fish and fish habitat	The “transmission Line” footprint appears to cross two watercourses. One over a tributary at the northern extent of the footprint area and one over the Revell River. It is unclear whether the transmission line will be installed above or below ground where the crossings are (i.e. above ground impacts can be avoided,	Potential adverse effect on fish and fish habitat from a work, undertaking, or activity.	Any potential adverse effect on fish and fish habitat from a work, undertaking, or activity also has the potential to impact indigenous rights.	If applicable: fish habitat assessment on the functions of each watercourse is required. Photos of the habitat would be an important part of this. Detailed designs for each crossing would be required.	If applicable: photos of each watercourse, footprints of any proposed work in/near water, designs for each crossing.

				below ground may be less likely).				
DFO-06	Revell River where the “rail spur” crosses over – see Figure 2	Site preparation and construction	Impacts to fish and fish habitat	The “Rail Spur” footprint appears to cross the Revell River. It is unclear what type of watercourse crossing will be installed (bridge, culvert etc.)	Potential adverse effect on fish and fish habitat from a work, undertaking, or activity as a result of potential flow changes, flow diversion due to watercourse crossing design.	Any potential adverse effect on fish and fish habitat from a work, undertaking, or activity also has the potential to impact indigenous rights.	Photos of the habitat and detailed engineer design for the crossing would be required. If applicable, design consideration should be considered to ensure adequate flows are retained, minimizing downstream flow impacts, and to provide fish passage.	Photos of the crossing location, footprint and design of the crossing proposed.
DFO-07	Revell River where the “natural gas pipeline” crosses over – see Figure 2	Site preparation and construction	Impacts to fish and fish habitat	The “Natural Gas Pipeline” footprint appears to cross the Revell River. However, DFO is unclear if Horizontal Directional Drilling (HDD) be used or other proposed methods.	Potential adverse effect on fish and fish habitat from a work, undertaking, or activity.	Any potential adverse effect on fish and fish habitat from a work, undertaking, or activity also has the potential to impact indigenous rights.	Photos of the habitat and detailed design for the crossing would be required.	Photos of the crossing location, footprint and design of the crossing proposed. If HDD is not being proposed, justification for alternative methodology.
DFO-08	Tributary where “Dyment Road” crosses over – see Figure 2	Site preparation and construction	Impacts to fish and fish habitat	There appears to be one watercourse crossing on Dyment Road. It is unclear whether a culvert is present, and whether this culvert will required replacement.	Potential adverse effect on fish and fish habitat from a work, undertaking, or activity as a result of potential flow changes, flow diversion due to watercourse crossing design.	Any potential adverse effect on fish and fish habitat from a work, undertaking, or activity also has the potential to impact indigenous rights.	If applicable: fish habitat assessment on the functions of the watercourse. Photos of the habitat would be an important part of this. Designs for the crossing. If applicable, design should ensure adequate flows are retained, minimizing downstream flow impacts, and to provide fish passage.	If applicable: photos of the watercourse, footprints of any proposed work in/near water, designs for the crossing.
DFO-09	Watercourses at the southern extent of the “main site” – see Figure 2	Site preparation and construction	Impacts to fish and fish habitat	There appears to be three or four watercourses in the “Main Site” footprint area at the southern extent. It is unclear whether these watercourses are part of the “Main Site” footprint or part of the “Main Site” footprint underground. It is also unclear whether these	The project could result in the harmful alteration of fish habitat through a change in surface water flows from overprinting or diverting watercourses or waterbodies and groundwater flows.	Any potential adverse effect on fish and fish habitat from a work, undertaking, or activity also has the potential to impact indigenous rights.	If applicable: fish habitat assessment on the functions of each watercourse is required. Photos of the habitat would be an important part of this. Designs for each crossing would be required. If applicable, the design for the realignment or the infill is required.	If applicable: photos of each watercourse, footprints of any proposed work in/near water, detailed designs for each crossing and potential realignment. Additional detail that would help understand the scale and scope of

				watercourses will require infill or realignment.				impacts could include fish species distribution in watercourses/bodies that may be affected.
DFO-10	General Comment	Site preparation and construction	Impacts to fish and fish habitat	Any other locations where works, undertakings, or activities are taking place where fish habitat function will directly or indirectly be impacted. Some may not be visible on Google Earth imagery.	Potential adverse effect on fish and fish habitat from a work, undertaking, or activity.	Any potential adverse effect on fish and fish habitat from a work, undertaking, or activity also has the potential to impact indigenous rights.	If applicable: fish habitat assessments, photos, footprints, and designs.	If applicable: fish habitat assessments, photos, footprints, and designs.
DFO-11	Species at Risk (SAR) in the project area	Site preparation and construction	Impacts to fish and fish habitat	No species at risk under SARA are mapped for the project area. However DFO acknowledges that American Eel was identified from eDNA barcoding. Additional eDNA sampling and metabarcoding would be beneficial, however at this time, it is unclear whether project would impact this species. There is potential impacts resulting from improperly designed watercourse crossing over the Revell River: effects on passage. This premise also applies to any other SAR that could possibly be present but not mapped for the area.	Potential adverse effect on fish and fish habitat from a work, undertaking, or activity.	Any potential adverse effect on fish and fish habitat from a work, undertaking, or activity also has the potential to impact indigenous rights.	Appropriate crossing designs to allow for fish passage.	If applicable: fish habitat assessments, photos, footprints, and designs.
DFO-12	General comment on IPD statements related to fish and fish habitat	Site preparation and construction	Impacts to fish and fish habitat	For the following: - Section E, Table 19.4, page 211, the predicted residual effect states that “changes in fish and fish habitat are anticipated to be avoided or offset”; - Section 19.2.3.7 pages 229-232; and, - Table 19.18, page 249 It is unclear to DFO what modelling, metrics, assessment was conducted to	Potential adverse effect on fish and fish habitat from a work, undertaking, or activity.	Any potential adverse effect on fish and fish habitat from a work, undertaking, or activity also has the potential to impact indigenous rights.	Where applicable: fish habitat assessments, photos, footprints, and designs.	Where applicable: fish habitat assessments, photos, footprints, and designs.

				reach the conclusions listed for each of the above. DFO recommends the proponent provide the details used to reach these conclusions. DFO will assess whether these conclusions are applicable.				

Please insert additional rows as necessary

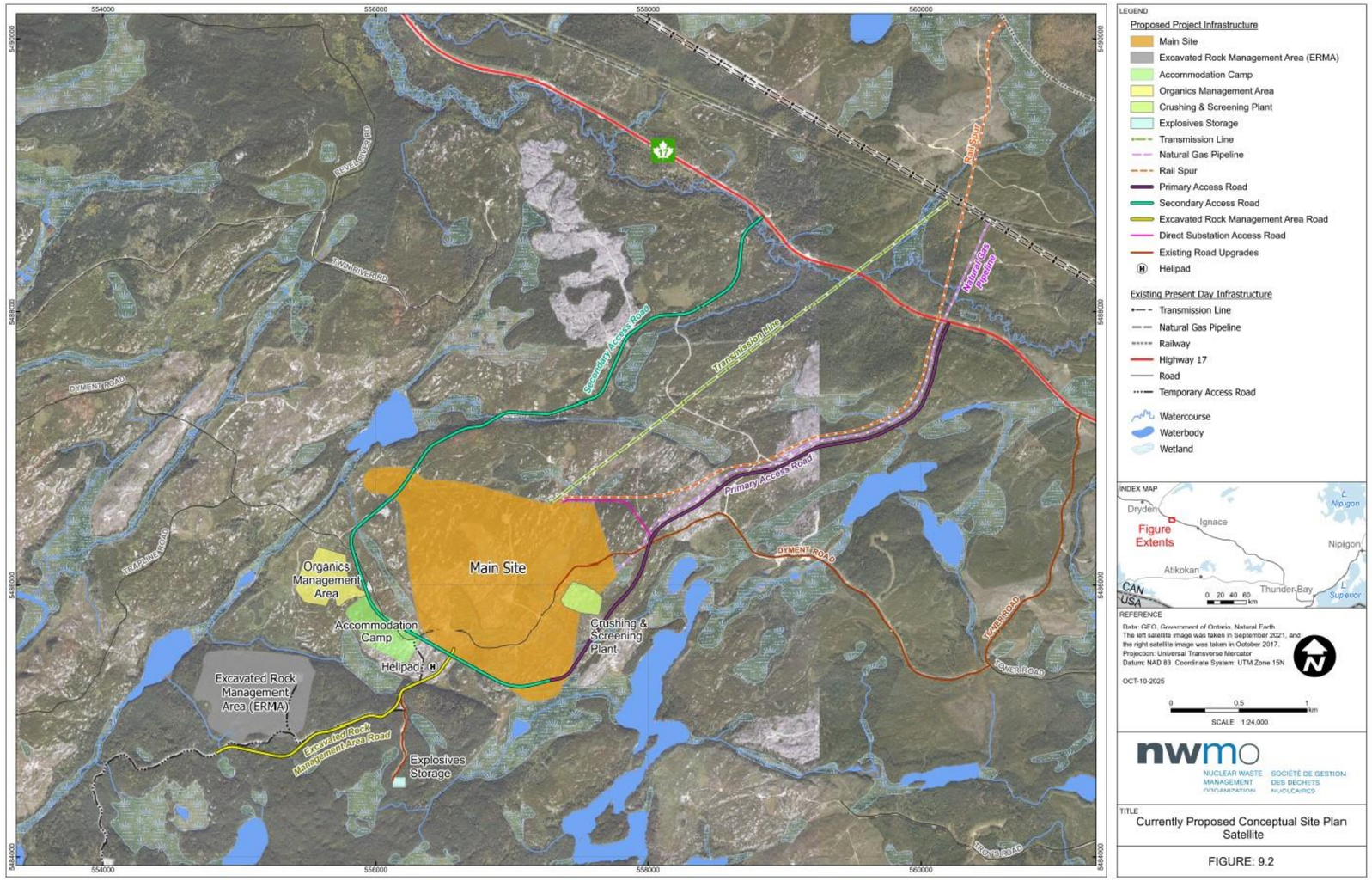

Figure 1. Screenshot of Figure 9.2 from the IPD. Added here for labelling purposes of the footprint areas marked below in figure 2.

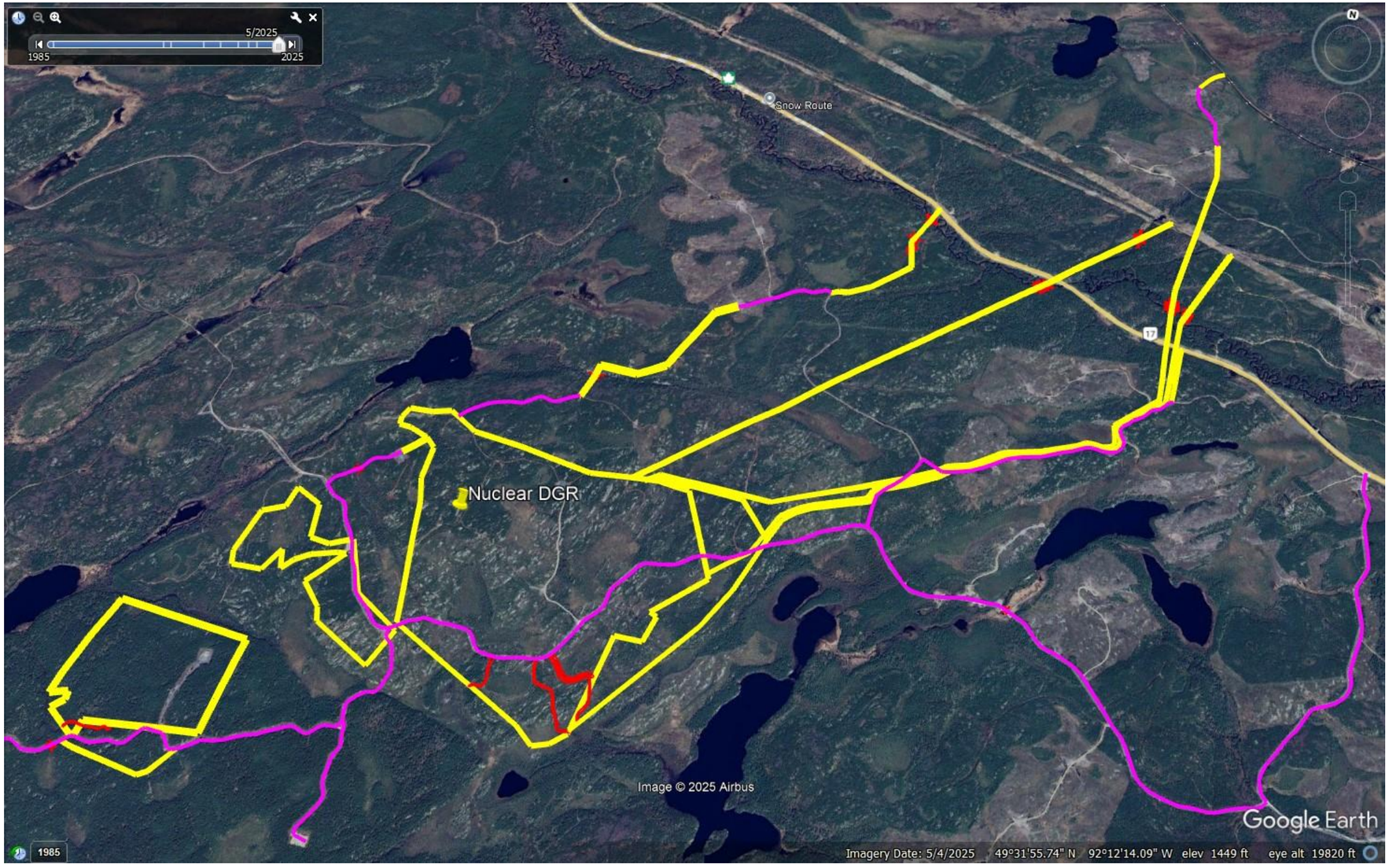

Figure 2. Footprint of the nuclear deep geological repository (DGR) drawn onto Google Earth imagery from May 4, 2025 for the purpose of trying to find potential fish habitat impacts within the project footprint. The drawn footprint is based on figures 9.1, 9.2, 13.1, 14.6, 14.7, and 14.8 from the IPD. Purple areas are previously established roads (dirt or gravel; i.e. previously established footprints). Yellow areas are new footprints as part of the project. Red areas are areas that have potential to be footprints reviewed by FFHPP under the *Fisheries Act* and *Species at Risk Act* (watercourses that are either permanent or intermittent that appear to potentially connect to fish bearing watercourses/waterbodies). However, there may be some areas missing as this is just based on the imagery. Note, the footprint areas may not be precise and the red areas are larger than the work proposed at that location would be so that it is visible when zoomed out on Google Earth.