



NUCLEAR WASTE MANAGEMENT ORGANIZATION  
SOCIÉTÉ DE GESTION DES DÉCHETS NUCLÉAIRES

March 13, 2026

APM-CORR-00650-302970

Chief and Council  
Rainy River First Nations

**CC:**

Jim Leonard, Chief <contact information removed>

Finn MacDonald, Impact Assessment Agency of Canada (nuclearwaste-dechetsnucleaires@iaac-aeic.gc.ca)

**RE: Response to Correspondence Regarding the Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project**

Dear Chief and Members of Council,

The Nuclear Waste Management Organization (NWMO) thanks Rainy River First Nations for its submission regarding the Initial Project Description (IPD) for the proposed Deep Geological Repository (DGR) for Canada's used nuclear fuel Project (Project). We acknowledge the care and consideration reflected in your review and appreciate the opportunity to respond directly.

In this letter, we seek to address each of the key issues in your submission identifying Project issues and concerns across the broader region.

**Scope of Impact Assessment process**

On January 5, 2026, the NWMO IPD was posted on the IAAC registry. Submitting the IPD formally initiates the rigorous integrated IA and nuclear licensing regulatory process for the Project. The IPD also supports IAAC in identifying potentially affected Indigenous communities, informing engagement planning, and establishing the scope of the assessment. There will be numerous opportunities for engagement before a decision is made about the Project. As reflected in the IPD, the Project has been assessed at a screening level, and the risk of residual adverse effects is anticipated to be low with effects primarily associated with localized Project activities.

After receiving NWMO's IPD, as required by the Impact Assessment Act (IAA), IAAC prepared the Summary of Issues, which the NWMO received on Monday, February 16, 2026. The Summary of Issues outlines the key issues for the federal integrated IA process raised by the public and Indigenous communities during the 30-day comment period on the IPD.

The integrated process follows strict requirements and will include the identification and assessment of potential pathways of interaction and will consider how the Project as described in the Initial Project Description could affect, among other things, the environment, human health, and Indigenous rights before the Project can be approved. As part of this process, the IAAC and the CNSC will develop the requirements

for the integrated assessment, requiring the NWMO to engage with the potentially affected Indigenous communities specified by the IAAC and the CNSC.

### **Potential Environmental Impacts**

The NWMO is confident in the safety of the Project. As described in the IPD, screening-level assessment of potential effects concluded that, with the application of industry-standard design features and mitigation measures, the Project is unlikely to result in residual adverse effects to air, surface water, groundwater, soils, plants, fish and wildlife over the short or long term. As part of the Impact Assessment and the initial licence application, as well as future licensing phases, the NWMO will be required to complete more detailed environmental and safety assessments to confirm the protection of people and the environment.

### **Water Protection and Monitoring**

As described in the IPD, NWMO is committed, for all phases of the Project, to collecting all contact water, monitoring it, and treating it as necessary prior to its release to the environment.

Protection of surface water and groundwater is a central focus of the Project design, the impact assessment and the CNSC licensing for the Project. The impact assessment and subsequent licensing processes will require detailed baseline characterization, modelling of groundwater and surface water interactions, and assessment of potential pathways of effect over the full life of the Project. Long-term monitoring programs will be required to confirm predicted performance and detect change over time, with requirements enforceable by regulators throughout the Project lifecycle.

### **Emergency Preparedness**

Emergency preparedness and response will be addressed through both the impact assessment and CNSC licensing processes. This includes emergency planning for transportation incidents, operational malfunctions, and unlikely failure scenarios. Emergency response plans must meet federal regulatory requirements and will be subject to review, testing, and inspection by the CNSC.

### **Meaningful Protection of Indigenous Rights**

The NWMO recognizes the importance of Indigenous and treaty rights and the role of traditional land use in cultural continuity and well-being. Through engagement with Indigenous groups potentially affected by the Project, the NWMO will consider potential effects to land use, harvesting, travel routes, and cultural practices in the assessment. Indigenous perspectives and Indigenous Knowledge, where shared by communities, will also be considered by the NWMO in the identification of effects, mitigation measures, and follow-up and monitoring programs.

### **Liability**

The NWMO remains responsible for the Project and its obligations throughout the licensing period and beyond. The Project will remain subject to regulatory oversight for approximately 160 years, with ongoing

obligations related to safety, environmental protection, monitoring, and reporting across construction, operation, closure, and post-closure phases.

### **Accommodation**

The IA process will assess how the Project may result in potential effects on Indigenous communities and identify appropriate mitigation measures where effects are predicted. Engagement with potentially affected Indigenous communities will inform how impacts are understood and addressed within the regulatory framework.

### **Engagement**

The Impact assessment, licensing, and regulatory compliance processes require ongoing engagement, public participation, and opportunities for Indigenous communities to provide input as the Project advances through different phases. Engagement is not limited to the approval stage. Engagement approaches will evolve over time to reflect Project activities, community interests, and information needs.

### **Independent Oversight**

Independent oversight will be provided by the CNSC under the *Nuclear Safety and Control Act*. The CNSC licenses nuclear facilities, conducts inspections and compliance verification, and has authority to enforce regulatory requirements throughout the full life of a project. As described in CNSC REGDOC-3.5.3, licensees are required to monitor and report on environmental and safety performance, promptly report events, and maintain programs that support public information and transparency. The CNSC can impose licence conditions, require corrective actions, and take enforcement measures where necessary, providing independent, ongoing accountability for safety and environmental protection.

### **Next Steps**

The NWMO appreciates the opportunity to respond to Rainy River First Nations' questions and welcomes the opportunity to meet with Rainy River First Nation to better understand how the Project may potentially affect your community. Please contact Joe Gaboury, Director, Indigenous Engagement, by email at <contact information removed> or by phone at <contact information removed> at your convenience if you are interested in meeting in this regard.

In the meantime, for additional information regarding the Project, we refer you to the NWMO's response to the Summary of Issues provided by IAAC based on the IPD. The NWMO's response is available on the IAAC's registry website for this Project at: <https://iaac-aeic.gc.ca/050/evaluations/proj/88774>.

We would welcome the opportunity to discuss next steps at your convenience.

Sincerely,

<Original signed by>

Jessica Perritt  
Director, Indigenous Relations & Reconciliation  
<contact information removed>