

March 13, 2026

APM-CORR-00655-302960

Chief and Council  
Lac des Mille Lacs First Nation

**CC:**

Mr. Quentin Snider, Executive Director <contact information removed>

Mr. David Mackett, Manager, Lands & Resources <contact information removed>

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

**RE: Response to Correspondence Regarding the Deep Geological Repository Project**

Dear Chief and Council,

The Nuclear Waste Management Organization (NWMO) thanks Lac des Mille Lacs First Nation (LDMLFN) for its submission dated February 4, 2026, regarding the Initial Project Description (IPD) for the proposed Deep Geological Repository (DGR) for Canada's used nuclear fuel (Project). We acknowledge the care and consideration reflected in your review. We are also grateful for our discussion regarding the Project at our meeting on March 4, 2026.

In this letter, we seek to address the key issues and concerns in the immediate vicinity of the project site in your February 4, 2026, submission and to provide further clarity on the topics you have addressed.

**Scope of the Impact Assessment process: past and future engagement**

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.

The IPD is the first regulatory submission intended to initiate the federal Impact Assessment (IA) process and to support the Impact Assessment Agency of Canada (IAAC) in identifying potentially affected Indigenous Nations, informing engagement planning, and establishing the scope of the assessment. The NWMO understands the issue you have raised about the timeframe for commenting on the IPD. NWMO wrote to LDMLFN on July 29, 2025, to invite LDMLFN to participate in the regulatory decision-making process and to discuss the IPD prior to its submission, NWMO also followed up on December 9, 2025, January 5, 2026, and February 13, 2026, to keep LDMLFN updated on our progress. NWMO appreciates your comments on the IPD to date and, as noted in its July 2025 correspondence, there will be numerous additional opportunities available for LDMLFN to provide input as the regulatory processes advance.

Your letter also raises issues about how NWMO will consider potential effects of the Project during the Impact Assessment process. While Wabigoon Lake Ojibway Nation is the host Indigenous community and most proximate Indigenous group to the Project, the IPD recognizes that other Indigenous groups may also experience effects. In particular, the IPD identifies LDMLFN as a potentially affected Indigenous group and acknowledges that additional work is required through the IA process to understand community-specific valued components, potential impacts, mitigation measures, and monitoring and follow-up needs.

Engagement with potentially affected Indigenous groups, including LDMLFN, will be important in identifying changes to land and resource use and characterizing potential impacts on Indigenous rights and interests. These perspectives will inform the work the NWMO will do in the Impact Statement, including the assessment of cumulative effects and significance and the development of mitigation measures, to ensure that Indigenous knowledge, values, and rights are appropriately considered as the Project advances.

NWMO acknowledges prior engagement with LDMLFN and recognizes that this history is relevant context for ongoing discussions. As the Project has transitioned into the regulatory decision-making phase, NWMO remains committed to advancing engagement with LDMLFN to support participation in the Impact Assessment process, including sharing information, understanding concerns and interests, and ensuring that the Nation's perspectives can inform the assessment of potential effects and the development of mitigation and follow-up measures as the Project advances.

### **Oversight and risks of DGR**

You have raised questions about oversight and governance of the Project. As outlined in the IPD, the Project is subject to independent, regulator-led review, with IAAC overseeing the IA and the Canadian Nuclear Safety Commission's (CNSC) as the lifecycle regulator, providing rigorous oversight across all phases of the Project. Through these processes, the Project is subject to a phased, regulator-led approval process, with the CNSC providing independent oversight across all phases of the Project, including construction, operations, closure, and post-closure. As part of the licensing processes, NWMO will be required to provide financial guarantees and post-closure safety analyses for the Project. But because the IPD is the first regulatory submission intended to initiate an IA and licensing processes, the detailed work to assess oversight arrangements has not yet been completed.

Your letter also raises issues about the risks of building a DGR and storing used nuclear fuel underground. The NWMO acknowledges that the Project, as defined by the Project activities outlined in the IPD, presents risks that differ from those associated with other infrastructure projects and require careful assessment and management. The NWMO agrees that key risks must be identified, studied, and understood before site preparation or construction activities are authorized. The Impact Statement and associated licensing submissions provide important opportunities to assess these potential effects, including safety and environmental considerations related to underground construction, accidents, and malfunctions, and to identify appropriate avoidance and mitigation measures. These assessments will be informed by ongoing engagement and will be subject to independent regulatory review by the IAAC and the CNSC, as described above.

Based on extensive site investigations and technical studies undertaken since 2010, the NWMO has confidence that the selected site has characteristics suitable for the safe containment and isolation of used nuclear fuel. The NWMO's Confidence in Safety Report is publicly available. In addition to IAAC's review of the Project, this conclusion will be tested through the CNSC's graded, lifecycle approach to licensing. The initial licence sought would be limited to site preparation activities. A separate and more detailed safety case would be required to support any licence to construct, including confirmation of the safety of underground construction methods and blasting activities, and a further licence would be required before any operations involving emplacement of used nuclear fuel could occur. At each stage, regulatory approval must be obtained before the Project may proceed.

### **Transportation**

In various parts of your submission, you have raised issues about transporting used nuclear fuel. As part of the Impact Assessment for the Project, as defined by the Project activities outlined in the IPD, the NWMO is assessing potential effects of transportation activities at the Project site, including accidents and malfunctions associated with transportation on the primary and secondary access roads. If there are accidents involving used nuclear fuel shipments, we expect that they would be similar to conventional traffic accidents, with no release of radioactive material due to the nature of the transportation package.

Transportation of used nuclear fuel beyond the Project site is not part of the Project. Such transportation would rely on existing vehicular infrastructure is regulated through a separate federal framework administered by the CNSC, which governs safety, security, emergency preparedness, and compliance of nuclear substances along transportation corridors.

Before any shipments of used nuclear fuel would occur, the applicable transport package must be certified by the CNSC, the transportation provider must hold a valid CNSC transportation licence, and emergency response arrangements must be in place and approved, as required. Shipments cannot commence until these regulatory requirements are met, confirming that transportation is safe, secure, and compliant with Canada's nuclear regulatory framework. Such shipping is not expected to begin until at least 2043.

### **Accidents, Malfunctions and Emergency Preparedness**

We understand that you have raised issues about whether the IPD includes sufficient information about accidents, malfunctions and emergency preparedness. The IPD is intended as a preliminary submission to initiate the IA process and does not provide detailed accident or safety analyses. As outlined in the IPD, the assessment of accidents, malfunctions, and long-term safety considerations at the Project site, including how risks would be managed and mitigated, will be addressed through the IA and subsequent licensing processes. NWMO remains committed to engaging with LDMLFN as these processes proceed, including

sharing information on how potential accident scenarios and safety measures will be evaluated and addressed through the regulatory reviews.

As documented in the Licensing Appendix to the IPD (beginning on PDF page 317), emergency preparedness is a foundational component of the licensing process and is subject to the CNSC's emergency management framework. If the NWMO is successful in obtaining IA approval and initial licensing approvals, the IA Decision Statement and the licence issued would include enforceable environmental protection requirements, such as limits on radioactive and hazardous releases, obligations for environmental monitoring and emissions reporting, and requirements for emergency preparedness and response plans. Consistent with REGDOC-1.2.3 (Licence Application Guide: Licence to Prepare Site for a Deep Geological Repository), the licence application must describe an emergency preparedness program that meets the requirements of REGDOC-2.10.1 (Nuclear Emergency Preparedness and Response), including emergency management and fire protection measures. The NWMO would also be required to implement an Environmental Protection Program to monitor performance, ensure compliance, and support continuous improvement.

NWMO remains committed to engaging with LDMLFN to share information on emergency preparedness planning and to ensure that emergency response arrangements are informed by engagement as the regulatory reviews proceed.

### **IA methodologies and approaches**

Your submission also raises issues about the scope of the assessment zone and the methodologies of the assessment. As outlined in the IPD, the detailed assessment of potential effects, including the appropriate study areas for the effects assessment, will be undertaken through the IA process. Effects assessment methodologies will be developed on a component-specific basis and informed by the IAAC's Tailored Impact Statement Guidelines, as well as relevant CNSC guidance, including REGDOC-1.2.1 (Guidance on Deep Geological Repository Site Characterization), REGDOC-2.9. 1 (Environmental Protection: Environmental Principles, Assessments and Protection Measures), and REGDOC-3.5.3 (Regulatory Fundamentals). Consistent with the CNSC's graded approach to licensing, the level of detail and analysis will be commensurate with the Project phase and associated risks.

Additional work is underway to support the assessment, including studies of the interconnectedness of groundwater and surface water systems, detailed geoscience and hydrogeological investigations, seismic studies, human health and ecological risk assessments, and continued evaluation of engineered barrier performance. As described in the IPD, ongoing baseline data collection and assessment studies will be completed as part of the Impact Statement and the initial licence application, which would be limited to site preparation activities only. The NWMO welcomes a discussion with LDMLFN about these studies.

NWMO also recognizes international practice for deep geological repositories and agrees with the importance placed on rigorous, long-term safety assessment for a project of this nature. As documented in the Licensing Appendix to the IPD, and consistent with CNSC requirements, NWMO will build on our existing safety cases to develop both a facility Safety Case and a Post-Closure Safety Assessment that considers long-term scenarios over geological time scales, including the effects of climate change, glaciation, seismic activity, groundwater evolution, and the long-term performance and stability of engineered and natural barriers. This work will be undertaken in accordance with REGDOC-2.11.1 Volume III, *Safety Case for the Disposal of Radioactive Waste*, which is aligned with the requirements of the International Atomic Energy Agency publication *Specific Safety Requirements - 5 Disposal of Radioactive Waste*. The overall Safety Case is supported by analytical assessments consistent with the requirements of CSA N292.7 *Deep*

*geological disposal of radioactive waste and irradiated fuel*, and will form part of the CNSC's lifecycle regulatory oversight of the Project.

This includes quantitative modelling of long-term system performance, consideration of uncertainty, and evaluation of scenarios such as climate change, glaciation, seismic activity, groundwater evolution, and engineered barrier performance over the full lifecycle of the facility. The site-specific hydrogeological model used in the Post-Closure Safety Assessment is developed using borehole data from the site, and accounts for potential hydrogeological pathways with respect to contaminant transport to the surface.

With respect to climate change, detailed assessment of climate change effects and long-term system performance will be advanced through the Impact Statement and licensing processes and will examine how evolving environmental conditions, including extreme weather events, flooding, wildfires, freeze–thaw cycles, infrastructure degradation, erosion, groundwater–surface water interactions, and engineered barrier performance, may affect the Project over time. This work is ongoing and will be informed by site characterization, geoscience, environmental, human health, and ecological risk assessments completed in accordance with CNSC requirements.

The NWMO thanks LDMLFN for our meeting on March 4, 2026 and is ready discuss how the LDMLFN's perspectives may be appropriately scoped into study methodologies developed through the IA and licensing processes, ensuring that Indigenous knowledge, values, and issues inform long-term safety evaluation as the Project advances through regulatory review. The NWMO would also welcome a discussion with LDMLFN on monitoring and mitigation approaches.

### **Potential Cumulative and intergenerational effects**

The NWMO understands that issues have been raised regarding cumulative effects at a regional scale. A cumulative effects assessment will be completed as part of the Impact Statement, examining how the Project interacts with past, present, and reasonably foreseeable activities and pressures over time and space, in accordance with IAAC guidance. The IPD identifies LDMLFN as a potentially affected Indigenous group and acknowledges that additional work is required through the IA process to understand community-specific valued components, mitigation, and monitoring needs. NWMO welcomes the opportunity to meet to discuss how the Nation may wish to be involved in the cumulative effects study as the IA proceeds.

The NWMO also understands that issues have been raised regarding potential intergenerational and cultural effects associated with the long-term presence of the DGR. The Project is intended to reduce intergenerational effects, which is a driver for undertaking this Project. Moreover, the Project is expected to provide socio-economic and cultural benefits, including infrastructure and community development benefits at the regional level; however, uncertainty remains regarding potential effects on Indigenous groups based on baseline data collected to date, and the need for engagement with potentially affected Indigenous groups.

These social and cultural considerations will be assessed as part of the IA for the Project, where Indigenous perspectives will inform the identification of valued components, pathways of effect, and the assessment of benefits over time. As indicated in the IPD, potential Indigenous social, cultural, economic, and health effects will be a central focus of the Impact Statement and addressed through assessment studies and ongoing engagement with potentially affected Indigenous groups.

### **Next steps**

NWMO welcomes the opportunity to meet and continue our dialogue with LDMLFN to better understand LDMLFN's how the Project may potentially affect your community. NWMO also welcomes LDMLFN's participation in these regulatory processes, including in the matters described above such as the identification of studies, valued components, and issues of importance, as well as in the development of appropriate mitigation measures and follow-up and monitoring programs. We would welcome the opportunity to discuss next steps at your convenience. Please contact Joe Gaboury, Director, Indigenous Engagement, by email at <contact information removed> or by phone at <contact information removed> 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 the Project at: <https://iaac-aeic.gc.ca/050/evaluations/proj/88774>.

Thank you again for sharing LDMLFN's perspectives. We look forward to continued dialogue.

Sincerely,

<Original signed by>

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

Tel 416.934.9814  
Fax 416.934.9526  
Toll Free 1.866.249.6966

22 St. Clair Avenue East, Fourth Floor  
Toronto, Ontario M4T 2S3, Canada  
[www.nwmo.ca](http://www.nwmo.ca)