Ontario Power Generation

New Nuclear at Wesleyville in Port Hope

OPG Comments on Draft Integrated Tailored Impact Statement Guidelines and Draft Plans

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i. Abbreviations and Short Forms

CNSC	Canadian Nuclear Safety Commission
EMF	Electric and Magnetic Fields
EMO	Emergency Management Ontario
ERA	Environmental Risk Assessments
EPZ	Emergency Planning Zone
HHRA	Human Health Risk Assessment
IA	Integrated Impact Assessment
IAA	Impact Assessment Act
IAAC	Impact Assessment Agency of Canada
IS	Impact Statement
LSA	Local Study Area
LTPS	Licence to Prepare Site
MS-WTFNs	Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations
NNW	New Nuclear at Wesleyville in Port Hope
NSCA	Nuclear Safety and Control Act
OPG	Ontario Power Generation
PNERP	Provincial Nuclear Emergency Response Plan
RSA	Regional Study Area
SACC	Strategic Assessment of Climate Change
TISG	Integrated Tailored Impact Statement Guidelines

1. Introduction

Ontario Power Generation (OPG) is Ontario's largest low-carbon power generator, with one of the most diverse generating portfolios in North America. OPG operates hydroelectric, nuclear, solar, biomass, and natural gas generating stations, and its current portfolio provides about half of Ontario's power needs.

OPG is committed to continuing to decarbonize Ontario's energy supply to meet Canada's climate change goals. OPG is focused on building mutually beneficial relationships with Rights-holding First Nations and interested Indigenous communities as it explores projects that support Ontario's clean energy transition. Nuclear power is an important part of Ontario's diverse and reliable electricity mix, which also includes hydroelectric generation, natural gas, battery storage, biomass, wind, solar, hydrogen, and other emerging technologies. Nuclear plays a unique role by providing large scale, low-carbon electricity around the clock. As Ontario continues to electrify its economy and reduce emissions, nuclear remains essential to delivering dependable, low-carbon electricity to homes, businesses, and communities across the province.

On April 2, 2026, the Impact Assessment Agency of Canada (IAAC) decided that pursuant to Section 16 of the Impact Assessment Act (IAA), further assessment of the New Nuclear at Wesleyville in Port Hope (NNW) Project is required. On the same day, the IAAC, on behalf of the Honourable Julie Dabrusin, Minister of the Environment, Climate Change and Nature, referred the impact assessment for the NNW Project to an independent review panel.

On April 7, 2026, IAAC and the Canadian Nuclear Safety Commission (CNSC) posted the Draft Integrated Tailored Impact Statement Guidelines (TISG) and draft Plans on the IAAC Registry Site and began a public comment period on these draft documents. OPG appreciates the opportunity to provide input and feedback on these documents and has organized its input as follows:

- Draft TISG (see Table 1); and
- Draft Plans – Indigenous Engagement and Participation Plan, Public Participation Plan, Permitting Plan and Cooperation Plan (see Table 2).

2. Approach and General Feedback

2.1. OPG's Approach

OPG understands that the NNW Project is subject to an integrated impact assessment process led by an integrated review panel in which IAAC and the CNSC will cooperate to implement, together with an integrated review panel, the requirements of the IAA and the Nuclear Safety Control Act (NSCA), resulting in "one project, one review".

As indicated in the IAA, the federal impact assessment process is to focus on significant adverse effects that may be caused by the carrying out of the project subject to the process. As a result, a key aspect of the federal impact assessment process as well as the Integrated TISGs is to maintain such a focus. Maintaining this focus is necessary for many reasons, including ensuring that participants in the process are not distracted and/or overwhelmed by other effects related to a project.

OPG recognizes that IAAC and CNSC have collaborated to incorporate overlapping IAA requirements with those for the site evaluation for a Licence to Prepare Site (LTPS), as outlined in REGDOC-1.1.1 (Canadian Nuclear Safety Commission, 2025). However, not all LTPS criteria are incorporated in the Integrated TISG. OPG has structured Table 1 to support IAA tailoring while preserving all non-tailorable REGDOC-1.1.1 LTPS requirements, and requests IAAC/CNSC perform a similar internal cross-check.

OPG's feedback in Table 1 and Table 2 is intended to improve clarity regarding the process and OPG's role as the proponent in preparing the Impact Statement. In light of the federal Cabinet Directive on Regulatory and Permitting Efficiency for Clean Growth Projects[1], and Ontario's Clean Energy Plan[2], OPG is actively evaluating ways to efficiently advance the NNW Project through the integrated Impact Assessment (IA) process. OPG will comply with applicable permits, licenses, authorizations and regulatory requirements, and will continue to engage with Rights-holding First Nations and interested Indigenous communities. Consistent with IAAC's Red Tape Progress Report[3], OPG supports IAAC's efforts to "reduce the burden on proponents by streamlining information requirements to make the process more predictable and

[1] https://www.canada.ca/en/privy-council/services/clean-growth-getting-major-projects-done/cabinet-directive.html (Government of Canada, 2025)
[2] https://www.ontario.ca/page/powering-ontario (Ministry of Energy and Mines, 2025)
[3] https://www.canada.ca/en/impact-assessment-agency/corporate/acts-regulations/red-tape-progress-report.html (Government of Canada, 2025)

manageable". OPG's feedback in Table 1 identifies further opportunities to streamline information requirements.

Engagement with Rights-holding First Nations and interested Indigenous communities will be carried out based on agreed upon process, activities and participation. OPG is committed to supporting Rights-holding First Nations' approaches to identify all real or potential impacts of the NNW Project to Rights. OPG will continue to offer to work collaboratively with Williams Treaties First Nations (WTFNs) to identify, understand, avoid, reduce, and where necessary, consider accommodations (including possible compensation) from real and potential impacts.

OPG has provided this feedback for consideration by IAAC and the CNSC and would welcome further conversation on any of these items.

2.2. General Feedback

Aligned with the approach described above, OPG is suggesting the following general feedback items for consideration by IAAC and the CNSC to increase clarity in the integrated Impact Assessment process:

I. Integrate the Generic Requirements for Impact Statements applicable to the Project into the Integrated TISG to best support clear, traceable and appropriately tailored guidance on expectations for the Project. A single document outlining all expected requirements reduces potential for misalignment should the generic requirements change or where language between the Integrated TISG and the generic requirements may overlap in scope. Recommendations on tailoring for clauses in the Generic Requirements for Impact Statements (August 2025 - interim version) have been shared in Table 1. Should tailoring and inclusion not be accepted, the version of the Generic Requirements to be applied to the Impact Statement should be specified in the Integrated TISG, namely the current version dated August 2025 (interim).

II. OPG wishes to recognize and respect that First Nations and other Indigenous communities may choose not to share Knowledge or community goals with OPG. OPG will consider all information provided to it by Rights-holding First Nations and interested Indigenous communities for the expressed purpose of use as an input to the Impact Statement development. Where Indigenous Knowledge is chosen by Rights-holding and interested Indigenous Nations to be shared for use in the Impact Statement, OPG will receive, record (where agreed), and reflect it in a culturally appropriate way that follows community protocols (to the extent provided to OPG) and Indigenous methodologies, and consider it alongside

scientific and technical information. OPG acknowledges that Indigenous Knowledge used by OPG remains the ownership of the Knowledge holder(s) (not OPG), and any use, access, storage, or disclosure by OPG will be guided by Nation/community-specific knowledge sharing agreements, arrangements, or protocols (where in place) and is subject to prior informed permission for any inclusion, summary, or reference.

For clarity, when referencing information from Rights-holding First Nations and interested Indigenous communities, OPG recommends the use throughout the TISG and related Plans of appropriate qualifiers (such as "as available" and/or "where provided for use"), consistent with any applicable conditions and permissions.

III. It is OPG's understanding that the use of chosen terms such as 'Relatives' is not appropriate. OPG encourages readers to refer to the Initial Project Description (IPD), Section iii, Glossary of Process Term Changes to understand the context and terms chosen by Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations (MS-WTFNs) in the IPD.

IV. The proponent is expected to meet the requirements set out in the TISG; however, flexibility can be exercised in the methods and approaches used to achieve these requirements. Where the proponent considers that an alternative approach or methodology would achieve the same intent, a risk-based approach to collecting data reflective of an assessment of potential interactions during the Impact Statement phase will be followed. Based on the findings of the assessment, predictions can be validated over a longer time period for those effects of concern identified during the Impact Assessment phase.

V. OPG is proposing the removal of the "with and without" clause, as it would require development of a hypothetical counterfactual scenario that is not necessary in all cases to support a robust assessment of project and cumulative effects, and may introduce uncertainty where assumptions about future land use and activities cannot be substantiated. This is particularly relevant in the Municipality of Port Hope, where the NNW Project site is already designated for power generation and the surrounding area is experiencing ongoing urbanization, such that a single "without project" scenario may be difficult to define consistently and could distract from evaluating clearly attributable effects and effective mitigation. Making "with and without" comparisons a standard requirement can also increase effort and documentation across valued components without a commensurate improvement in decision-relevant information. Instead, OPG suggests requiring effects assessment relative to existing conditions, incorporating reasonably foreseeable changes and other

physical activities for cumulative effects, and providing a "without the project" discussion only where it is practicable, evidence-based, and it materially contributes to understanding mitigation, the extent to which likely adverse federal effects are significant, and follow-up requirements.

VI. OPG supports IAAC's determination that the information provided in the Initial Project Description is sufficient to address "alternatives to" the project. As indicated in Section 2.2.1 of the Initial Project Description and Annex A of the Response to Summary of Issues, NNW Project is in recognition of Ontario's Integrated Energy Plan Energy for Generations which calls for up to 12 large new nuclear units to be in service by 2050, with up to approximately 10,000MW of new large nuclear potential at the Wesleyville site. To generate the same amount of energy as 10,000MW of nuclear at Wesleyville, the province would need to set aside approximately 100 times more land for solar and 500 times more land for wind, highlighting the energy density and land efficiency of nuclear power (Ministry of Energy and Mines, 2025). OPG has been directed to develop and operate such nuclear units; OPG has not been directed to decide on the energy mix that OPG would like to develop.

VII. OPG has identified that references to REGDOC-1.1.1 in the TISG currently link to either Version 1 or Version 1.2. OPG requests that references to REGDOCs, codes, and standards in the TISG (including CSA standards) link to versions whose freeze dates will be formally agreed upon by the CNSC and OPG.

3. OPG's Comments on Draft Integrated Tailored Impact Statement Guidelines and Draft Plans

3.1. Comments on Draft Integrated Tailored Impact Statement Guidelines

Preamble:
OPG has provided general comments and feedback on the structure of the Draft Integrated Tailored Impact Statement Guidelines in Section 2.2. Table 1 below provides specific recommendations and the associated rationale for consideration by IAAC and the CNSC. Specifically, strikethrough has been used to identify text suggested for removal and bolded text for proposed added text.

Table 1: OPG Comments on the Draft Integrated Tailored Impact Statement Guidelines

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (strikethrough indicates suggested text removal; bold suggests proposed new text)	Rationale for OPG's Proposed Updates to Draft TISG Text
Comments on the Generic Requirements for Impact Statements				
1	Generic requirements for Impact Statements Assessment methodology	The proponent is encouraged to take an ecosystem-based approach that considers how the project may affect the structure and functioning of biotic and abiotic factors within the ecosystem using scientific evidence, Indigenous Knowledge and community knowledge.	The proponent is encouraged to take an ecosystem-based approach that considers how the project may affect the structure and functioning of biotic and abiotic factors within the ecosystem using scientific evidence, Indigenous Knowledge and community knowledge, **where provided for this use.**	As indicated in Section 2.2 (II) of this document, OPG is proposing additional text to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement. The same may hold true for community knowledge holders.

2	Generic requirements for Impact Statements
	
	Assessment methodology – spatial and temporal boundaries
		The Impact Statement must:
		
		- describe the spatial boundarie(s) for each VC and provide a rationale for each boundary, considering:
		  - scale and spatial extent of effects from the project,
		  - the physical location of potential receptors, including any relevant movement pattern,
		  - interactions between VCs,
		  - Indigenous Knowledge and community knowledge,
		  - current or traditional land and resource use by Indigenous groups,
		  - Indigenous Peoples and their rights, including treaty lands, traditional territories and areas or sites used for cultural and spiritual practices,
		  - scientific evidence,
		  - geographic extent of effects of past, existing and reasonably foreseeable projects and physical activities, and
		  - information received from Indigenous groups;
		- show the spatial boundaries on maps to clearly illustrate the predicted geographic extent of changes to the environment as visual tools to support engagement and consultation with the public and Indigenous groups (i.e. zone of influence maps with defined boundaries); and
			The Impact Statement must:
			
			- describe the spatial boundarie(s) for each VC and provide a rationale for each boundary, considering:
			  - scale and spatial extent of effects from the project,
			  - the physical location of potential receptors, including any relevant movement pattern,
			  - interactions between VCs,
			  - Indigenous Knowledge and community knowledge **where provided for this use,**
			  - current or traditional land and resource use by Indigenous groups **where provided for this use,**
			  - Indigenous Peoples and their rights, including treaty lands, traditional territories and areas or sites used for cultural and spiritual practices, **where provided for this use,**
			  - scientific evidence,
			  - geographic extent of effects of past, existing and reasonably foreseeable projects and physical activities, and
			  - information received from Indigenous groups;
			- show the spatial boundaries on maps to clearly illustrate the predicted geographic extent of changes to the environment as visual tools to support engagement and consultation with the public and Indigenous groups (i.e. zone of influence maps with defined boundaries); and
				As indicated in Section 2.2 (II) of this document, OPG is proposing additional text to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (strikethrough indicates suggested text removal; bold suggests proposed new text)	Rationale for OPG's Proposed Updates to Draft TISG Text
		- identify where spatial boundaries may extend to areas that are (i) on federal lands, (ii) in a province other than the one where the project is being carried out, or (iii) outside Canada.	- identify where spatial boundaries may extend to areas that are (i) on federal lands, (ii) in a province other than the one where the project is being carried out, or (iii) outside Canada.	
3	Generic requirements for Impact Statements Assessment methodology – spatial and temporal boundaries	Describe the temporal boundarie(s) for each VC and provide a rationale for each boundary, considering: - schedule of phases of the project, - past conditions and historical context, - Indigenous Knowledge and community knowledge, - impacts on Indigenous Peoples and their rights, including current or traditional land and resource use, treaty lands, traditional territories and areas or sites used for cultural and spiritual practices, - relevant physical, technical, ecological, social, health, economic and cultural considerations from an ecosystem approach, - timing of past, existing and reasonably foreseeable projects and activities and their effects, - that boundaries will generally be larger for cumulative effects, and - - information received from Indigenous groups.	Describe the temporal boundarie(s) for each VC and provide a rationale for each boundary, considering **where relevant:** -schedule of phases of the project, ~~- past conditions and historical context,~~ -Indigenous Knowledge and community knowledge **where provided for this use,** -impacts on Indigenous Peoples and their rights, including current or traditional land and resource use, treaty lands, traditional territories and areas or sites used for cultural and spiritual practices **where provided for this use,** -relevant physical, technical, ecological, social, health, economic and cultural considerations from an ecosystem approach, -timing of past, existing and reasonably foreseeable projects and activities and their effects. ~~- that boundaries will generally be larger for cumulative effects~~, and -information received from Indigenous groups **where provided for this use.**	OPG is proposing additional text to support a VC-specific, fit-for-purpose application of the requirement where boundaries should be commensurate with how/when the project could reasonably interact with each VC (i.e., "where relevant"). As indicated in Section 2.2 (II) of this document, OPG is proposing additional text to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement. The same may hold true for community knowledge holders. OPG is proposing removal of text to reduce duplication where "past conditions and historical context" as well as that "boundaries will generally be larger for cumulative effects" are already reflected in "timing of past, existing and reasonably foreseeable projects and activities and their effects".
4	Generic requirements for Impact Statements Assessment methodology – baseline conditions	Baseline conditions are the existing conditions prior to the project, including how historical, past or existing projects and activities have already affected the conditions, and must be established in a manner and at a level of detail relevant to predict the effects of the project on each VC.	Baseline conditions are the existing conditions prior to the project, including how historical, past or existing projects and activities have already affected the **existing** conditions, and must be established in a manner and at a level of detail relevant to predict the effects of the project on each VC.	OPG is proposing additional text to recognize that for many VCs, the existing conditions reflect change from historical, past or existing projects and activities.
5	Generic requirements for Impact Statements Assessment methodology – baseline conditions	Describe changes in the baseline conditions that are likely to occur in the future, if the project were not carried out, including future changes due to climate change;	**Where it materially contributes in the effects assessment to understanding mitigation measures, the** extent to which likely adverse federal effects are significant and follow-up requirements, describe changes in the baseline conditions that are likely to occur in the future, if the project were not carried out, including future changes due to climate change;	OPG is proposing additional text to provide clarity in how this requirement will be addressed in the Impact Statement commensurate with the early design stage of project planning. As indicated in Section 2.2 (V), OPG would provide "without the project" discussions where it is practicable, evidence-based, and materially contributes to understanding mitigation measures, the extent to which likely adverse federal effects are significant, and follow-up requirements.
6	Generic requirements for Impact Statements Assessment methodology – baseline conditions	Show that the data sources used are representative of conditions within the established spatial and temporal boundaries and account for natural variability, especially if surrogate data from representative sites are used rather than specific measurements at the project site;	~~Show that the~~ **Describe how** data sources used are representative of conditions within the established spatial and temporal boundaries and **how the Impact Assessment process will** account for natural variability, especially if surrogate data from representative sites are used rather than specific measurements at the project site;	OPG is proposing modifications to provide clarity in how this requirement will be addressed in the Impact Statement. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the Impact Assessment process or another regulatory requirement. For example, follow-up monitoring, compliance monitoring, future Environmental Risk Assessments (ERAs), and environmental management programs will be implemented to validate assumptions. Adaptive management measures will be developed where required.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (strikethrough indicates suggested text removal; bold suggests proposed new text)	Rationale for OPG's Proposed Updates to Draft TISG Text
7	Generic requirements for Impact Statements Assessment methodology – effects assessment	The assessment of effects must be based on a comparison of baseline conditions with and, where baseline conditions are anticipated to change over time, without the project.	The assessment of effects must be based on a comparison of baseline conditions with and, where baseline conditions are anticipated to change over time **and it materially contributes to understanding mitigation measures, the extent to which likely adverse federal effects are significant, and follow-up requirements,** without the project.	OPG is proposing modifications to provide clarity in how this requirement will be addressed in the Impact Statement. As indicated in Section 2.2 (V), OPG would provide a "without the project" discussions where it is practicable, evidence-based, and materially contributes to understanding mitigation measures, the extent to which likely adverse federal effects are significant, and follow-up requirements.
8	Generic requirements for Impact Statements Assessment methodology – effects assessment	Describe the analytical methods to assess effects, including clearly stated assumptions for predictions and how each assumption has been tested;	Describe the analytical methods to assess effects, including clearly stated assumptions for predictions; ~~and how each assumption has been tested;~~	OPG is proposing removal of text to provide clarity in how this requirement will be addressed in the Impact Statement. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how requirements may be met through the Impact Assessment process or through another regulatory process. Follow-up monitoring, compliance monitoring, future ERAs, and environmental management programs will be implemented to validate assumptions. Adaptive management measures will be developed where required.
9	Generic requirements for Impact Statements Assessment methodology – effects assessment	For the effect assessment of each VC, the Impact Statement must: describe the perspectives, concerns and tolerance levels of Indigenous groups and other participants;	For the effect assessment of each VC, the Impact Statement must: describe the perspectives and concerns ~~and tolerance levels~~ of Indigenous groups and other participants **where provided for this use;**	OPG is proposing removal of the phrase 'and tolerance levels' as it may be interpreted as requiring participants to articulate quantitative thresholds or limits of acceptability when in practice, perspectives and concerns are often context dependent and may not be appropriately or consistently expressed as a tolerance level. OPG is proposing additional text "where it is provided for this use". As indicated in Section 2.2 (II) of this document, OPG is proposing additional text to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement.
10	Generic requirements for Impact Statements Assessment methodology – effects assessment	For quantitative predictions based on models, describe model assumptions, parameters, margins of errors, as well as model calibration, validation and model performance metrics used;	For quantitative predictions based on models, describe model assumptions, parameters, margins of errors, as well as model calibration, validation and model performance metrics used; **or future processes to validate quantitative predictions**	OPG is proposing additional text to provide clarity in how this requirement will be addressed in the Impact Statement commensurate with the early design stage of project planning. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the Impact Assessment process or through another regulatory process. Follow-up monitoring, compliance monitoring, future ERAs, and environmental management programs will be implemented to validate assumptions. Adaptive management measures will be developed where required.
11	Generic requirements for Impact Statements Assessment methodology – mitigation measures	Describe how the mitigation measures may also address adverse impacts on Indigenous rights and, if necessary, describe any additional measures to address adverse impacts on Indigenous rights;	Describe how the mitigation measures may also address adverse impacts on Indigenous rights and, if necessary, describe any additional measures to address adverse impacts on Indigenous rights **based on shared discussions with or other information provided for this use by First Nations and Indigenous communities;**	OPG is proposing additional text. As indicated in Section 2.2 (II) of this document, OPG is proposing additional text to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (strikethrough indicates suggested text removal; bold suggests proposed new text)	Rationale for OPG's Proposed Updates to Draft TISG Text
12	Generic requirements for Impact Statements Assessment methodology – mitigation measures	Document collaboration with, and perspectives from, Indigenous groups on mitigation measures, as well as any additional measures to address impacts on Indigenous rights and any enhancements of benefits for Indigenous Peoples, including: - how the proponent has addressed the suggestions and recommendations from impacted Indigenous groups, - how Indigenous Knowledge was considered, and - how the timing of Indigenous activities on the land was considered (e.g. schedule of project activities);	Document collaboration with, and perspectives from, Indigenous groups on mitigation measures, as well as any additional measures to address impacts on Indigenous rights and any enhancements of benefits for Indigenous Peoples, **where provided for such use.** including: - how the proponent has addressed the suggestions and recommendations from impacted Indigenous groups, - how Indigenous Knowledge was considered, and - how the timing of Indigenous activities on the land was considered (e.g. schedule of project activities);	As indicated in Section 2.2 (II) of this document, OPG is proposing modifications to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement. Input shared by Rights-holding First Nations and interested Indigenous communities would be included at their direction and may or may not include the specific scopes described related to mitigation measures.
13	Generic requirements for Impact Statements Assessment methodology – mitigation measures	Provide a table listing all mitigation measures essential to ensure the project will not result in significant adverse federal effects, or to reduce their extent of significance (to low or moderate significance), and any additional measures to address impacts on Indigenous rights and, for each measure:	Provide a table listing ~~all~~ mitigation measures that when implemented, ~~essential to ensure~~ the project will not result in **residual** ~~significant~~ adverse federal effects~~, or to reduce their extent of significance (to low or moderate significance), and any additional measures to address impacts on Indigenous rights and,~~ for each measure:	OPG is proposing removal of text to reduce duplication with direction in Section 4.0 of the Draft TISG (see also comment # 21).
14	Generic requirements for Impact Statements Assessment methodology – mitigation measures	Provide available evidence of the effectiveness of the measure, including quantifying to what extent it would eliminate, reduce, control or offset significant adverse federal effect(s). The proponent is also encouraged to share the evidence available with Indigenous groups. Uncertainty on effectiveness must be considered in the follow-up program and effects, should the measures not be effective or malfunction, must be incorporated into the residual effects assessment,	Provide available evidence of the effectiveness of **any new or innovative measures** ~~the measure, including quantifying to what extent it would eliminate, reduce, control or offset significant adverse federal effect(s). The proponent is also encouraged to share the evidence available with Indigenous groups. Uncertainty on effectiveness must be considered in the follow-up program and effects, should the measures not be effective or malfunction, must be incorporated into the residual effects assessment,~~	OPG is proposing removal of text to reduce duplication with direction in Section 4.0 of the Draft TISG. Also, OPG recommends focusing this requirement on providing evidence of effectiveness for new or innovative measures, recognizing that standard mitigation measures shared by federal departments for consideration in the Impact Assessment are supported by established practice. Similarly, OPG's operational experience can be used to demonstrate the effectiveness of established mitigation and in-design measures. Follow-up monitoring, compliance monitoring, future ERAs, and environmental management programs will be implemented to validate assumptions. Adaptive management measures will be developed where required.
15	Generic requirements for Impact Statements Assessment methodology – cumulative effects assessment	The Impact Statement must assess the project's likely cumulative adverse federal effects as well as impacts on Indigenous Peoples and their rights. The proponent is encouraged to make use of the Government of Canada Open Science and Data Platform, Open Government Portal and Government of Canada Publications as tools to access science, data, publications and information about development activities to better understand cumulative effects.	The Impact Statement must assess the project's likely cumulative adverse federal effects as well as impacts on Indigenous Peoples and their **exercise of** rights. The proponent is encouraged to make use of the Government of Canada Open Science and Data Platform, Open Government Portal and Government of Canada Publications as tools to access science, data, publications and information about development activities to better understand cumulative effects.	OPG is proposing additional text to align language with Section 7 of the Draft TISG.
16	Generic requirements for Impact Statements	For adverse federal effects on VCs and impacts on Indigenous Peoples and their rights, the Impact Statement must:	For adverse federal effects on VCs and impacts on Indigenous Peoples and their **exercise of** rights, the Impact Statement must:	OPG is proposing additional text to align language with Section 7.0 of the Draft TISG.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (strikethrough indicates suggested text removal; bold suggests proposed new text)	Rationale for OPG's Proposed Updates to Draft TISG Text
	Assessment methodology – cumulative effects assessment			
17	Generic requirements for Impact Statements Assessment methodology – cumulative effects assessment	A comparison of possible future scenarios the project, reflecting the total cumulative effects and not just the project's contribution, and	**A qualitative and/or quantitative (where appropriate and feasible)** comparison of possible future **conditions/**scenarios, reflecting the total cumulative effects and not just the project's contribution, and	OPG is proposing additional text to provide clarity in how this requirement will be addressed in the Impact Statement commensurate with the early design stage of project planning. As indicated in Section 2.2 (V), OPG would provide a "without the project" discussions where it is practicable, evidence-based, and materially contributes to understanding mitigation measures, the extent to which likely adverse federal effects are significant, and follow-up requirements.
18	Generic requirements for Impact Statements Assessment methodology – cumulative effects assessment	Provide a rationale for any excluded VC;	~~Provide a rationale for any excluded VC;~~	OPG is proposing removal of this text as the cumulative effects assessment will consider those VCs for which residual adverse effects are predicted consistent with the *Policy Framework for Assessing Cumulative Effects under the Impact Assessment Act* (Government of Canada, 2025).
19	Generic requirements for Impact Statements Assessment methodology – cumulative effects assessment	Where measures to mitigate cumulative effects are beyond the control of the proponent, identify any parties that have authority to mitigate the effects and summarize any commitments or complementary measures by the other parties regarding their implementation and any associated communication plan;	Where measures to mitigate cumulative effects are beyond the control of the proponent, identify any parties that have authority to mitigate the effects and summarize any commitments or complementary measures by the other parties regarding their implementation and any associated communication plan **where publicly available;**	OPG is proposing additional text to provide clarity in how this requirement will be addressed in the Impact Statement commensurate with the early design stage of project planning. OPG would include publicly available commitments by parties that have authority to mitigate the effects beyond the control of the proponent.
20	Generic requirements for Impact Statements Assessment methodology – cumulative effects assessment	Consider the ability of Indigenous Peoples to exercise their rights and culture, including where the project's incremental impacts are minor, as well as the views and preferences of each Indigenous group in carrying out and presenting the assessment. Where provided with information and in collaboration with Indigenous groups, the proponent must document the lived and told experience of the effects in relation to the ability of Indigenous Peoples to exercise their rights and culture through time; and	Consider the ability of Indigenous Peoples to exercise their rights and culture~~, including where the project's incremental impacts are minor, as well as the views and preferences of each Indigenous group in carrying out and presenting the assessment. Where provided with information and in collaboration with Indigenous groups, the proponent must document the lived and told experience of the effects in relation to the ability of Indigenous Peoples to exercise their rights and culture through time; and~~ **Information would be included where Indigenous groups have shared it and are aligned with the uses indicated by each Indigenous group for sharing information or input.**	OPG is proposing modifications to consider more outcome-focused wording while maintaining intent of this requirement. In addition, as indicated in Section 2.2 (II), OPG is also proposing modifications to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement. It is OPG's understanding that the MS-WTFNs intend to pursue a MS-WTFNs led Impact Assessment for the NNW Project as noted by MS-WTFNs in Section 2.3 of the Initial Project Description. As noted in Section 7.0 of the Draft TISG, outcomes or information from the MS-WTFNs led assessment can be brought forward into the Impact Assessment and decision making phases of the impact assessment by the proponent and/or MS-WTFNs in order to support the requirements of the Impact Assessment Act, the Crown's duty to consult and to inform the Impact Assessment Act and LTPS decisions.
21	Generic requirements for Impact Statements Assessment methodology – Extent to which likely	Indicate whether the effect is likely to be, to some extent, significant and, if so, the extent of significance (i.e. low, moderate or high significance) by characterizing the extent	Indicate whether the effect is likely to be, to some extent, significant and, if so, the extent of significance ~~(i.e. low, moderate or high significance) by characterizing the extent of significance on a scale of not significant; low, moderate or high significance;~~	OPG is proposing removal of text to retain this requirement as outcome-focused while maintaining its intent. OPG will align its determination of significance based on the available guidance from IAAC on the determination of the extent to which likely adverse federal effects are significant.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (strikethrough indicates suggested text removal; bold suggests proposed new text)	Rationale for OPG's Proposed Updates to Draft TISG Text
	adverse federal effects are significant	of significance on a scale of not significant; low, moderate or high significance;		
22	Generic requirements for Impact Statements Assessment methodology – Extent to which likely adverse federal effects are significant	Provide a rationale for the methodology and choice of quantitative or qualitative criteria used to determine the extent to which the effect is significant. Criteria and relevant benchmarks should be defined and applied with Indigenous groups; and	Provide a rationale for the methodology and choice of quantitative or qualitative criteria used to determine the extent to which the effect is significant, **including any input shared by Indigenous groups where it is provided for this use or through engagement with stakeholders.** ~~Criteria and relevant benchmarks should be defined and applied with Indigenous groups; and~~	OPG is proposing additional text to consider the input shared by the Rights-holding First Nations and interested Indigenous communities, and stakeholders in its criteria to determine the extent to which an effect is significant. As indicated in Section 2.2 (II), OPG is proposing additional text to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement. The same may hold true for community knowledge holders.
23	Generic requirements for Impact Statements Assessment methodology – Extent to which likely adverse federal effects are significant	Identify and explain relevant sources of information that were used to characterize the extent to which the effect is significant, including the sensitivity and importance of affected VCs, the existence of standards or guidelines, disproportionate effects for diverse population groups as per the GBA Plus, and how the perspectives, concerns and tolerance levels of Indigenous groups and participants were considered.	Identify and explain relevant sources of information that were used to characterize the extent to which the effect is significant, including **where relevant** the sensitivity and importance of affected VCs, the existence of standards or guidelines, disproportionate effects for diverse population groups as per the GBA Plus, and how the perspectives **and** concerns ~~and tolerance levels~~ of Indigenous groups and participants were considered, **where provided for this use.**	OPG is proposing additional text to support a VC-specific, fit-for-purpose application of the requirement (i.e., "where relevant"). For each VC, information sources should be commensurate with how/when the project could reasonably interact with each VC and sufficient to support the characterization of potential effects and the extent of significance. OPG is proposing removal of the phrase 'and tolerance levels' as it may be interpreted as requiring participants to articulate quantitative thresholds or limits of acceptability. Perspectives and concerns are often context dependent and may not be appropriately or consistently expressed as a tolerance level. As indicated in Section 2.2 (II), OPG is proposing modifications to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement.
24	Generic requirements for Impact Statements General Information	Include all information in a machine-readable, accessible format. Where information is provided as a map in the Impact Statement, the proponent must provide corresponding electronic geospatial data file(s). IAAC will make the geospatial data files available to the public under the terms of the Open Government Licence – Canada. Geospatial data files must follow IAAC's Guidance on submitting geospatial data. In addition, the proponent should be prepared to provide data, including surveys, analyses, methods, modelling, and results in well-documented data files, including geoenabled format where available, at the request of IAAC [or the review panel] to support the impact assessment.	**In addition, the proponent should be prepared to provide data, including surveys, analyses, methods, modelling, and results in well-documented data files, including geoenabled format where available, at the request of IAAC [or the review panel] to support the impact assessment.**	OPG is proposing relocation of the highlighted clause so it is not included under "the Impact Statement must" requirements. Instead, it should be a standalone requirement to allow information to be provided upon request by IAAC or the Review Panel to support the impact assessment, separate from the Impact Statement submission requirements and timelines.
25	Generic requirements for Impact Statements Description of potential malfunctions or accidents that may occur in connection to the project	Major effects could be caused by the failure of certain works resulting from malfunctions (i.e. works do not operate as intended) or from accidents (i.e. human error), including in cases where events resulting from effects of the environment on the project are a contributing or complicating factor (e.g. flooding, earthquake, forest fire). Malfunctions or accidents that may occur in connection with the project must be	Major effects could be caused by the failure of certain works resulting from malfunctions (i.e. works do not operate as intended) or from accidents (i.e. human error), including in cases where events resulting from effects of the environment on the project are a contributing or complicating factor (e.g. flooding, earthquake, forest fire). Malfunctions or accidents that may occur in connection with the project must be described (even if unlikely to	OPG is proposing additional text to maintain flexibility in the timing based on the early design state of the Project and consideration of alternative means.

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		described (even if unlikely to occur) and, where relevant, their effects on each VC must be assessed. For projects that include marine shipping or navigation, the proponent is encouraged to undertake a Navigation Safety Assessment Program (NSAP) review collaboratively with Transport Canada's Marine Safety and Security Directorate, and include it in the Impact Statement.	occur) and, where relevant, their effects on each VC must be assessed. ~~For projects that include~~ **Where** marine shipping or navigation **may be needed,** the proponent is encouraged to ~~undertake~~ **state the potential need for and timing of** a Navigation Safety Assessment Program (NSAP) review collaboratively with Transport Canada's Marine Safety and Security Directorate and, **where appropriate**, include it in the Impact Statement.	
26	Generic requirements for Impact Statements Impact Statement Summary	As part of the submission of its Impact Statement, the proponent must prepare and submit a stand-alone plain language summary of the Impact Statement in both English and French. The summary must contain sufficient details for the reader to understand the project and its adverse federal effects and impacts on Indigenous Peoples and their rights. The summary provides an opportunity for the proponent to demonstrate through a plain-language narrative how it addressed issues raised, notably by Indigenous groups and the public. The summary must include maps illustrating the project location, key project components, and zone of influence of the project on its environment. The proponent is also encouraged to include visual tools to illustrate the predicted geographic extent of changes to the environment (e.g. zone of influence maps with defined boundaries) as well as relevant tables including of mitigation measures and the follow-up program.	As part of the submission of its Impact Statement, the proponent must prepare and submit a stand-alone plain language summary of the Impact Statement in both English and French. The summary must contain sufficient details for the reader to understand the project and its adverse federal effects and impacts on Indigenous Peoples and their rights. The summary provides an opportunity for the proponent to demonstrate through a plain-language narrative how it addressed issues raised, notably by Indigenous groups and the public. The summary must include maps illustrating the project location **and** key project components, ~~and zone of influence of the project on its environment.~~ The proponent is also encouraged to include visual tools to illustrate the predicted geographic extent of changes to the environment (e.g. zone of influence maps with defined boundaries) as well as relevant tables including of mitigation measures and the follow-up program.	OPG is proposing removal of text to remove the conflict between the proponent "must" and "is encouraged" statements on including zone of influence mapping.
27	Generic requirements for Impact Statements Impact Statement Summary	Impacts on Indigenous Peoples and their rights, and the mitigation measures or any additional measures to address them;	Impacts on Indigenous Peoples and their rights, and the mitigation measures or any additional **assessment or** measures to **define and** address them**, informed by information where it is provided for this use;**	OPG is proposing additional text to consider more outcome-focused wording while maintaining the intent of this requirement. As indicated in Section 2.2 (II), OPG is proposing additional text to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement. It is OPG's understanding that the MS-WTFNs intend to pursue a MS-WTFNs led Impact Assessment for the NNW Project as noted by MS-WTFNs in Section 2.3 of the Initial Project Description. As noted in Section 7.0 of the Draft TISG, outcomes or information from the MS-WTFNs led assessment can be brought forward into the Impact Assessment and decision making phases of the impact assessment by the proponent and/or MS-WTFNs in order to support the requirements of the Impact Assessment Act, the Crown's duty to consult and to inform the Impact Assessment Act and LTPS decisions.
Comments on the Draft Integrated TISG				
28	1.2.1 – Site evaluation	The site evaluation and IA determine, for the entire lifecycle of the project, whether:	The site evaluation and IA ~~determine~~ **provides adequate and sufficient information on the environmental effects of the**	OPG is proposing modifications to align with wording in Appendix G1 of REGDOC-1.1.1 (Canadian Nuclear Safety Commission, 2025).

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		siting option choices were made to avoid or minimize environmental effects;	**project so that it can be determined,** for the entire lifecycle of the project, whether: siting option choices were made to avoid or reduce environmental effects;	
29	1.2.1 – Site evaluation	The site evaluation process should satisfy the criteria contained in the following documents that apply to the facility being considered, including applicable federal environmental legislation and resources [3], [7], [8], and [9] in the Compendium. In accordance with the Canadian Standards Association (CSA) N288.6 [8], the site evaluation is periodically re-evaluated. The re-evaluation focuses on confirmation of the site characteristics and assessing the effects of the updated information. Design modifications, updates to operations, or both may be needed.	The site evaluation process should satisfy the criteria contained in the following documents that apply to the facility being considered, including applicable federal environmental legislation and resources [3], [7], ~~[8],~~ and [9] in the Compendium. ~~In accordance with the Canadian Standards Association (CSA) N288.6 [8],~~ **As indicated in the Preface of [3],** the site evaluation is periodically re-evaluated. The re-evaluation focuses on confirmation of the site characteristics and assessing the effects of the updated information. **Design modifications, updates to operations, or both may be needed.**	As CSA N288.6 does not specifically mention site evaluation, OPG is proposing a revision to this text to refer to REGDOC 1.1.1 instead which states *"Its content also addresses how site evaluation information obtained during site preparation activities is used and revisited in subsequent lifecycle phases of construction and operation"* (Canadian Nuclear Safety Commission, 2025). OPG is recommending to remove "Design modifications, updates to operations, or both may be needed" as a technology has not been selected such that a site-specific baseline design is established.
30	1.2.2 – Site Preparation	The proponent is applying for a LTPS for a Class IA nuclear facility under the NSCA. The proponent is required to hold an LTPS before any work is done on the site.	The proponent is applying for an LTPS for a Class IA nuclear facility **and Class IB nuclear waste facility** under the NSCA. The proponent is required to hold an LTPS before any **licensed site preparation activities are** ~~work is~~ done on the site.	OPG is proposing additional text as the Licence to Prepare Site application is planned to include activities related to a nuclear facility (Class IA nuclear facility) and a waste facility (Class IB nuclear facility). OPG is proposing to replace "work" with "licensed site preparation activities" to clarify that many pre-licensing and ongoing OPG facility activities will be happening on the site prior to a Licence to Prepare Site being issued (for example, borehole drilling activities to support site evaluation).
31	1.3 –Selection of Valued Components	Valued Components (VCs) serve as the focal points for the impact assessment. The elements of the natural and human environments selected as VCs are those anticipated to be material for decision making under the IAA. The assessment of effects on VCs includes the assessment of the likely effect pathways that are cause-effect linkages between a project component or activity and the VC. The VCs must be assessed following the requirements presented in these Integrated Guidelines, as well as the generic assessment methodology in the Generic Requirements for Impact Statements which outlines the steps that must be applied to the assessment of each VC.	Valued Components (VCs) serve as the focal points for the impact assessment. The elements of the natural and human environments selected as VCs are those anticipated to be material for decision making under the IAA. The assessment of effects on VCs includes the assessment of the likely effect pathways that are cause-effect linkages between a project component or activity and the VC. The VCs must be assessed following the requirements presented in these Integrated Guidelines, ~~as well as the generic assessment methodology in the Generic Requirements for Impact Statements which outlines the steps that must be applied to the assessment of each VC.~~	As indicated in Section 2.2 (l), OPG is proposing that applicable clauses from the Generic Requirements for Impact Statements be integrated into the Draft TISG.
32	1.3 –Selection of Valued Components (Table)	Meteorological environment	~~Meteorological environment~~	OPG is proposing removal of meteorological environment from the list of VCs and redefining it as an input to other VCs, as applicable to establish baseline and assessing project-related effects. This is in keeping with REGDOC-1.1.1 (Canadian Nuclear Safety Commission, 2025) and the requirements of the Draft TISG to describe meteorological environment conditions and not the effects to the meteorological environment.
33	1.3 –Selection of Valued Components (Table)	Geology and geochemistry, including shorelines, peninsulas, and islands	Geology and geochemistry ~~,~~ including shorelines ~~peninsulas, and islands~~	OPG is proposing removal of peninsulas and islands from the VC name. No peninsulas or islands are anticipated to be affected by the Project. This is in alignment with OPG's Initial Project Description.

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34	1.3 –Selection of Valued Components (Table)	Community wellbeing	~~Community wellbeing~~ **Social and economic conditions**	OPG is proposing to replace the "community wellbeing", "services and infrastructure", and "employment and economics" with "social and economic conditions" as the proposed VC. Project-related activities may result in both positive and negative impacts to a variety of assets or the social and economic conditions that a community possesses or desires in order to achieve their community well-being objectives, including those of diverse population subgroups (e.g., women+; youth; persons of colour; persons with disabilities). Project-related activities may result in changes to the physical and biological environments which could affect a variety of social and economic conditions, including places where people live, work and play.
35	1.3 – Selection of Valued Components (Table)	Services and infrastructure	~~Services and infrastructure~~	As above, included in Social and economic conditions
36	1.3 –Selection of Valued Components (Table)	Employment and economics	~~Employment and economics~~	As above, included in Social and economic conditions
37	1.3 –Selection of Valued Components (Table)	Job creation and procurement opportunities	~~Job creation and procurement opportunities~~	As above, included in Social and economic conditions
38	1.3 –Selection of Valued Components (Table)	Education and training	~~Education and training~~	As above, included in Social and economic conditions
39	1.3 –Selection of Valued Components (Table)	Indigenous Peoples Current use of lands, waters and Relatives for traditional purposes by Indigenous Peoples	Indigenous Peoples Current use of lands, waters~~ and Relatives~~ **and resources** for traditional purposes by Indigenous Peoples	OPG is proposing removal of the term "Relatives". As indicated in Section 2.2 (III) of this document, it is OPG's understanding that the use of chosen terms such as 'Relatives' is not appropriate; OPG recognizes that such characterization would need to be assessed by Rights-holding First Nations and interested Indigenous communities who may choose not to share information for use in the Impact Statement. OPG is committed to engagement with Rightsholders and interested Indigenous communities in the development of the Impact Statement. OPG will fulfill the requirements to assess VCs related to Indigenous Peoples to the extent it is possible to do so.
40	1.3 –Selection of Valued Components	The proponent may select additional VCs, based on engagement with First Nations and other Indigenous communities and public participants and in consideration of Indigenous Knowledge and community knowledge. The Impact Statement must provide a justification if a VC suggested by a First Nations or Indigenous community is excluded from the Impact Statement.	The proponent ~~may select additional VCs~~ **will confirm the VCs included in the Integrated Guidelines** based on engagement with First Nations and other Indigenous communities and public participants and in consideration of Indigenous Knowledge and community knowledge. ~~The Impact Statement must provide a justification if a VC suggested by a First Nations or Indigenous community is excluded from the Impact Statement.~~ **The proponent will provide rationale for the selected VCs in the Impact Statement and may refine the list presented in the Integrated Guidelines to ensure it appropriately reflects the scope of the assessment.**	OPG is proposing modifications to this requirement to better reflect the process for engagement with respect to VC selection and how this will be documented in the Impact Statement. OPG will engage with Rightsholders, interested Indigenous communities and stakeholders to confirm that the VCs identified in the Integrated TISG appropriately reflect the scope of the assessment (please see Section 2.2 (II. OPG will provide rationale for the selected VCs in the Impact Statement including where refinements were made to the list of VCs presented in the Integrated TISG through the engagement process.
41	1.4 –Preparing the Impact Statement	The Impact Statement must address requirements outlined in these Integrated Guidelines as well as in IAAC's Generic Requirements for Impact Statements, including the requirements on assessment methodology, general information, description of change to the project that may be caused by the environment, description of potential	The Impact Statement must address requirements outlined in these Integrated Guidelines ~~as well as in IAAC's Generic Requirements for Impact Statements~~, including the requirements on assessment methodology, general information, description of change to the project that may be caused by the environment, description of potential malfunctions and accidents that may	Aligned with Section 2.2 (I), OPG proposes that applicable clauses from the Generic Requirements for Impact Statements be integrated into the Draft TISG.

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		malfunctions and accidents that may occur in connection with the project, description of engagement with First Nations and other Indigenous communities, description of public participation, and Impact Statement Summary. Where the proponent is of the opinion that certain information is not required or cannot be provided, it should contact IAAC and the CNSC prior to submitting the Impact Statement to confirm whether the proponent's rationale for excluding the information is appropriate. The rationale must also be provided in the Impact Statement. Additionally, if there are Indigenous specific requirements that a First Nation or other Indigenous community does not wish to pursue for the Impact Assessment process, please provide confirmation from the First Nation or other Indigenous community in their section of the Impact Assessment.	occur in connection with the project, description of engagement with First Nations and other Indigenous communities, description of public participation, and Impact Statement Summary. Where the proponent is of the opinion that certain information is not required or cannot be provided, it should contact IAAC and the CNSC prior to submitting the Impact Statement to confirm whether the proponent's rationale for excluding the information is appropriate. The rationale must also be provided in the Impact Statement. Additionally, if there are Indigenous specific requirements that a First Nation or other Indigenous community does not wish to pursue for the Impact Assessment process, please provide confirmation from the First Nation or other Indigenous community in their section of the Impact Assessment.	
42	1.4 –Preparing the Impact Statement	Where the proponent is of the opinion that certain information is not required or cannot be provided, it should contact IAAC and the CNSC prior to submitting the Impact Statement to confirm whether the proponent's rationale for excluding the information is appropriate. The rationale must also be provided in the Impact Statement. Additionally, if there are Indigenous specific requirements that a First Nation or other Indigenous community does not wish to pursue for the Impact Assessment process, please provide confirmation from the First Nation or other Indigenous community in their section of the Impact Assessment.	Where the proponent is of the opinion that certain information is not required or cannot be provided, it should contact IAAC and the CNSC prior to submitting the Impact Statement to confirm whether the proponent's rationale for excluding the information is appropriate. The rationale must also be provided in the Impact Statement. Additionally, if there are Indigenous specific requirements that a First Nation or other Indigenous community does not wish to pursue for the Impact Assessment process, please provide confirmation from the First Nation or other Indigenous community in their section of the Impact Assessment, **as available to the proponent for such purposes.**	OPG is proposing additional text 'as available to the proponent'. As indicated in Section 2.2 (II) of this document, OPG is proposing additional text to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement.
43	1.4 –Preparing the Impact Statement	The proponent is also encouraged to submit draft documents for review by IAAC and the CNSC (e.g. proposed study plans, draft sections of the Impact Statement) prior to submitting the formal Impact Statement. The proponent is expected to provide IAAC and the CNSC a work plan for the Impact Statement phase of the integrated assessment, within 3 months of the Notice of Commencement.	The proponent is also encouraged to submit draft documents for review by IAAC and CNSC (e.g. proposed study plans, draft sections of the Impact Statement) prior to submitting the formal Impact Statement. The proponent is expected to provide IAAC and the CNSC a work plan for **the planned schedule including IAAC and CNSC review during** the Impact Statement phase of the integrated assessment, within 3 months of the Notice of Commencement.	OPG is proposing additional text to clarify the intended scope of the workplan, and nature of the content to be included.
44	1.4 –Preparing the Impact Statement	As relevant, the proponent is also encouraged to refer to the policy frameworks and guidance available in IAAC's Practitioner's Guide to Federal Impact Assessments including the Technical Considerations and References for the preparation of an Impact Statement [10], and to keep apprised of updates.	As relevant, the proponent is also encouraged to refer to the policy frameworks and guidance available in IAAC's Practitioner's Guide to Federal Impact Assessments including the Technical Considerations and References for the preparation of an Impact Statement [10], and to keep apprised of updates. **The proponent has the option to leverage the Impact Statement to meet provincial requirements under relevant provincial Acts, such as the Ontario Heritage Act.**	OPG is proposing additional text to include content such as non-Indigenous cultural heritage to meet the requirements of the Ontario Heritage Act in the Impact Statement.
45	1.5 – Federal permitting coordination	Under the IAA, federal authorities are prohibited from issuing permits before an impact assessment is completed.	Under the IAA, federal authorities are generally prohibited from issuing permits **in relation to carrying out of the Project** before an impact assessment is completed	OPG is proposing additional text to clarify what is prohibited under the IAA by the federal authorities.
46	2.2 –Qualifications of individuals preparing the Impact Statement	IAAC and CNSC expect the proponent to demonstrate scientific integrity in their preparation and delivery of the Impact Statement by:	IAAC and CNSC expect the proponent to demonstrate scientific integrity in their preparation and delivery of the Impact Statement by:	OPG is proposing removal of text to reduce duplication as additional detail on the documentation of uncertainty and bias are included in

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		- eliminating, controlling for, or appropriately managing potential biases; and - characterizing potential sources and types of scientific uncertainty, including their magnitude and any differences in the interpretation of scientific results.	- eliminating, controlling for, or appropriately managing potential biases; and - **qualitatively or quantitatively, as appropriate,** characterizing potential sources and types of scientific uncertainty~~, including their magnitude and any differences in the interpretation of scientific result~~	the Generic Requirements for Impact Statements (which OPG has recommended to integrate with the Draft TISG). Recognizing that impact assessment is an early planning tool to inform decision-making, OPG is proposing additional text to clarify that scientific uncertainty on the assessments of potential effects to VCs will vary in its sources, magnitude, and risk-informed decision relevance. Qualitative treatment may be most suitable when evidence is heterogenous or not readily parameterized, and when transparent discussion of assumptions and plausible ranges best supports interpretation. Quantification of potential sources and types of scientific uncertainty may be more appropriate when data and models support defensible statistical characterization and when numerical uncertainty materially affects comparisons, thresholds, or risk-informed decisions.
47	2.5 – Project Overview	Describe the project, key project components and ancillary activities (both nuclear and non-nuclear), scheduling details, the timing of each phase of the project[4], the total lifespan of the project and other key features. If the project is part of a larger sequence of projects, the Impact Statement must outline the larger context;	Describe the project, key project components and ancillary activities (both nuclear and non-nuclear), **a general schedule** ~~scheduling details~~, the timing of each phase of the project, the total lifespan of the project and other key features. If the project is part of a larger sequence of projects, the Impact Statement must outline the larger context;	OPG is proposing modifications given that schedule details may not be known at the time of the Impact Statement phase and a general schedule commensurate with the early design stage of project planning is sufficient.
48	2.6 – Management system for site evaluation	The process of establishing site evaluation-related management system parameters should involve technical and engineering analyses, along with judgments that require extensive experience and knowledge. Evaluations should be reviewed and verified by individuals or groups that are independent of those who did the work.	The process of establishing site evaluation-related management system parameters should involve technical and engineering analyses, along with judgments that require extensive experience and knowledge. **In many cases, the parameters and analyses may not lend themselves to direct verification by inspections, tests, or other techniques that can be precisely defined and controlled. In these cases,** evaluations should be reviewed and verified by individuals or groups that are independent of those who did the work.	OPG is proposing additional text to specify instances where independent verification is recommended. This provides a more focused approach to the use of these tools in line with the established CNSC requirements. By using language from REGDOC-1.1.1, alignment between the two documents can be improved (Canadian Nuclear Safety Commission, 2025).
49	2.5.1 – Decommissioning and Post-Closure Management	The Impact Statement must describe a preliminary decommissioning strategy consistent with applicable CNSC regulatory requirements (REGDOC-2.11.2) [17], including anticipated approaches to decontamination, dismantling, waste management, and site end-state objectives. The Impact Statement must describe anticipated used nuclear fuel quantities, storage methods, duration of on-site storage, and reasonably foreseeable long-term management pathways (e.g., transfer to an authorized disposal facility or continued monitored storage), sufficient to support the assessment of potential adverse federal effects across the full project lifecycle. The Impact Statement must assess potential long-term and post-closure effects on relevant valued components, including groundwater, surface water, the biological environment, and Indigenous Rights, and describe proposed monitoring, follow-up, and financial	The Impact Statement must describe **how the project will be decommissioned** ~~a preliminary decommissioning strategy~~ consistent with applicable CNSC regulatory requirements (REGDOC-2.11.2), including anticipated approaches to decontamination, dismantling, waste management, and site end-state objectives. **The Impact Statement must demonstrate that the site evaluation process has appropriately considered future decommissioning in the planning for the nuclear facility and has adequately considered end-of-life decommissioning. For activities encompassed by the Licence To Prepare Site, the Impact Statement must include a preliminary decommissioning plan and financial guarantee that cover the scope of work and related costs to return the site from the conditions expected at the end of a Licence To Prepare Site to an agreed-upon end state.** ~~The Impact Statement must describe anticipated used nuclear fuel quantities, storage methods, duration of on-site storage, and~~	OPG is proposing modifications to align the requirements for decommissioning and post-closure management outlined in TISG Section 2.5.1 with the requirements specified in REGDOC-2.11.2 (Canadian Nuclear Safety Commission, 2023) as well as relevant sections of REGDOC 1.1.1 (Canadian Nuclear Safety Commission, 2025) (Section 3.9 Decommissioning, Section 4.11.2 Decommissioning).

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		assurance mechanisms applicable to decommissioning and post-closure phases.	~~reasonably foreseeable long-term management pathways (e.g., transfer to an authorized disposal facility or continued monitored storage), sufficient to support the assessment of potential adverse federal effects across the full project lifecycle. The Impact Statement must assess potential long-term and post-closure effects on relevant valued components, including groundwater, surface water, the biological environment, and Indigenous Rights, and describe proposed monitoring, follow-up, and financial assurance mechanisms applicable to decommissioning and post-closure phases.~~	
50	2.6 – Project components and activities	Describe project components and activities to be carried out during each project phase, with a focus on components and activities with the greatest potential for adverse federal effects and impacts on First Nations and other Indigenous communities and their rights including management options for used nuclear fuel:	Describe project components and activities to be carried out during each project phase, with a focus on components and activities with the greatest potential for adverse federal effects and impacts on First Nations and other Indigenous communities and their **exercise of** rights including management options for used nuclear fuel:	OPG is proposing additional text to specify impacts on Rights-holding First Nations and other interested Indigenous communities' *exercise* of rights. The IS components that can be considered by OPG assess the impact on the exercise and practice of rights.
51	2.6.1 – Plant parameter envelope approach	The PPE is a listing of values that supports (or informs) the bounding envelope that can be used in the Impact Statement to assist in predicting the potential safety and environmental effects of a nuclear reactor facility at a particular site.	The PPE is a listing of **bounding** values ~~that supports (or informs) the bounding envelope~~ that can be used in the Impact Statement to assist in predicting the potential safety and environmental effects of a nuclear reactor facility at a particular site. **The listing of PPE values shall provide the required technology input to the pathways and effects assessment conducted in the Impact Assessment.**	OPG is proposing modifications to better describe the PPE approach and describe the source of parameters that are contained within the PPE.
52	2.6.1 – Plant parameter envelope approach	The PPE must be informed from the outset by engagement with First Nations and other Indigenous communities, including Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations which includes Alderville First Nation, Curve Lake First Nation, Hiawatha First Nation, Mississaugas of Scugog Island First Nations (MS-WTFN) defined impact pathways, where provided, and to report the results of this engagement in the Impact Statement. Where project activities may affect Indigenous Rights, lands, waters, or Relatives, the proponent must describe in the Impact Statement how Indigenous perspectives and Indigenous Knowledge informed the identification and mapping of PPE effect pathways and the selection of PPE parameters, indicators, and assumptions used to characterize those pathways.	**Where project activities may affect Indigenous Rights, lands, waters, or species the proponent will describe in the Impact Statement how Indigenous perspectives and Indigenous Knowledge informed the identification and mapping of pathways.** The PPE ~~must~~ **will** be informed **through early** ~~from the outset by~~ engagement with First Nations and other Indigenous communities, including Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations which includes Alderville First Nation, Curve Lake First Nation, Hiawatha First Nation, Mississaugas of Scugog Island First Nations (MS-WTFN). ~~defined impact pathways, where provided, and to report the~~ **Results** of this engagement **will be reported** in the Impact Statement. ~~Where project activities may affect Indigenous Rights, lands, waters, or Relatives, the proponent must describe in the Impact Statement how Indigenous perspectives and Indigenous Knowledge informed the identification and mapping of PPE effect pathways and the selection of PPE parameters, indicators, and assumptions used to characterize those pathways.~~	OPG is proposing modifications to clarify the requirements to link the PPE parameters to how they are used in understanding project effects. OPG will engage with the MS-WTFNs to discuss OPG's proposed modifications and understand any input they have on how the PPE can support the Impact Statement phase. OPG is proposing removal of the term "Relatives". As indicated in Section 2.2 (III) of this document, it is OPG's understanding that the use of chosen terms such as 'Relatives' is not appropriate; OPG recognizes that such characterization would need to be assessed by Rights-holding First Nations and interested Indigenous communities who may choose not to share information for use in the Impact Statement.
53	2.6.1 – Plant parameter envelope approach	PPE parameter selection must not be limited to biophysical or technical indicators alone. Where MS-WTFNs identify pathways related to access, harvesting, cultural continuity, stewardship responsibilities, governance responsibilities, or intergenerational wellbeing, the Impact Statement must explain how those pathways were reflected in the PPE	~~PPE parameter selection must not be limited to biophysical or technical indicators alone~~. **As described in Section 7,** where MS-WTFNs identify pathways related to access, harvesting, cultural continuity, stewardship responsibilities, governance responsibilities, or intergenerational wellbeing, the Impact Statement must explain how those pathways were reflected **in the**	OPG is proposing modifications to clarify the purpose of the PPE and to clarify that the pathways listed will be addressed in the Impact Statement.

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		framework and parameters, and areas of agreement and disagreement must be documented.	**Project** ~~PPE framework and parameters, and~~ **including** areas of agreement and disagreement ~~must be documented.~~	
54	2.6.1 – Plant parameter envelope approach	In applying a bounding envelope, the proponent's Impact Statement must provide: • [...] ○ ensure that the bounding parameters encompass all technologies under consideration including all design information that is necessary to support the Impact Statement and the proposed site preparation activities under the LTPS (e.g. plant footprint excavation, and excavation of cooling water intake tunnels);	In applying a bounding envelope, the proponent's Impact Statement must provide: • [...] ○ ensure that the bounding parameters encompass all technologies under consideration including all design information that is **used in the calculation of limiting effects in** ~~necessary to support~~ the Impact Statement and the proposed site preparation activities under the LTPS (e.g. plant footprint, ~~excavation and~~ **embedment depth,** ~~excavation of cooling water intake tunnels~~ **and circulating cooling water flow rates)**	OPG is proposing modifications to better describe the PPE approach by better reflecting the role of the PPE in calculating limiting effects and updating site preparation activity examples to those currently captured in the PPE.
55	2.6.1 – Plant parameter envelope approach	The pathways of effects for each technology, including a clear description of the differences among them; and	The pathways of effects for ~~each technology~~ **the plant parameter envelope**, including a clear description of the differences among ~~them~~ **each technology considered;** and	OPG is proposing modifications to reflect that OPG will use a bounding envelope approach, consistent with the approach described throughout the CNSC's REGDOC 1.1.1, for applicants that have not yet selected a technology (Canadian Nuclear Safety Commission, 2025).
56	2.6.1 – Plant parameter envelope approach	A description of the manner in which reactor technologies could differ in their impact on the environment throughout the project life cycle (i.e., site preparation, construction, operation, decommissioning, and abandonment); and	~~A description of the manner in which reactor technologies could differ in their impact on the environment throughout the project life cycle (i.e., site preparation, construction, operation, decommissioning, and abandonment); and~~	OPG is proposing removal of text to reflect that OPG will use a bounding envelope approach, consistent with the approach described throughout the CNSC's REGDOC 1.1.1 (Canadian Nuclear Safety Commission, 2025), for applicants that have not yet selected a technology. Additionally, the Impact Statement will consider pathways of effects for a bounding envelope defined by the PPE, which inherently encompasses pathways of effects for all technologies.
57	2.6.1 – Plant parameter envelope approach	In applying a bounding envelope, the proponent's Impact Statement must provide: • A description of key sources of uncertainty, including long-term, cumulative, and intergenerational uncertainties identified through engagement with First Nations and other Indigenous communities; and A description of clear measures for the management of uncertainty. Where uncertainty relates to potential impacts on Indigenous Rights, health, safety, cultural continuity, or stewardship responsibilities, the proponent must apply conservative assumptions where appropriate and describe adaptive management and follow-up measures designed to reduce uncertainty over time.	In applying a bounding envelope, the proponent's Impact Statement must provide: • A description of key sources of uncertainty~~, including~~ **with consideration given to** long-term, cumulative, and intergenerational uncertainties identified through engagement with First Nations and other Indigenous communities; and A description of clear measures for the management of uncertainty **with consideration given** ~~Where uncertainty relates~~ to potential impacts on Indigenous Rights, health, safety, cultural continuity, or stewardship responsibilities **where provided by First Nations and other Indigenous communities. The** proponent must apply conservative assumptions where appropriate and describe adaptive management and follow-up measures designed to reduce uncertainty over time.	OPG is using the PPE approach and has selected parameters to create a bounding envelope which includes considerations for uncertainty. OPG is committed to engagement with Rights-holding First Nations and interested Indigenous communities in the development of the Impact Statement, including opportunities to provide preferred order of priority for identified uncertainties and to participate in developing the methods, indicators, and follow-up and adaptive management approaches used to manage those uncertainties. As indicated in Section 2.2 (II), OPG is proposing additional text to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for the purposes of use in the Impact Statement.
58	2.6.1 – Plant parameter envelope approach	To facilitate meaningful engagement with First Nations and other Indigenous communities and the public on the use of the bounding approach, a clear understanding of the PPE and its role, the bounding parameters, and the pathways of effects for each technology and potential site location, is required.	To facilitate meaningful engagement with First Nations and other Indigenous communities and the public on the use of the bounding approach, a clear understanding of the PPE and its role, the bounding parameters, and the pathways of effects ~~for each technology and potential site location,~~ is required.	OPG is proposing removal of text as the Impact Statement will consider pathways of effects for a bounding envelope defined by the PPE, which inherently includes pathways for all technologies that it encapsulates.

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59	2.8.4 -Alternatives means of carrying out the project	Potential for adverse environmental, health, social and economic effects and impacts on First Nations and other Indigenous communities and their rights, as identified by First Nations and other Indigenous communities;	Potential for adverse environmental, health, social and economic effects and impacts on First Nations and other Indigenous communities and their rights, as identified by First Nations and other Indigenous communities, **where information/data are provided for this use;**	As indicated in Section 2.2 (II), OPG is proposing additional text to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement.
60	2.8.4 –Alternative means of carrying out the project	Describe all reasonable alternatives considered that would avoid impacts on current use of lands, waters and Relatives for traditional purposes considered during project development	Describe all reasonable alternatives considered that would avoid impacts on current use of lands, waters and ~~Relatives~~ **species** for traditional purposes considered during project development	OPG is proposing removal of the term "Relatives". As indicated in Section 2.2 (III) of this document, it is OPG's understanding that the use of chosen terms such as 'Relatives' is not appropriate; OPG recognizes that such characterization would need to be assessed by Rights-holding First Nations and interested Indigenous communities who may choose not to share information for use in the Impact Statement.
61	2.8.4 - Alternatives means of carrying out the project)	Address key project elements in its alternative means analysis, including, but not limited to, the following: [...] • switchyard design;	Address key project elements in its alternative means analysis, including, but not limited to, the following: [...] • ~~switchyard design;~~ • **Design of project area high voltage switching equipment within OPG control;**	OPG is proposing modifications to clarify the project element referred to as the 'Switchyard design'. OPG currently does not anticipate that a singular 'switchyard' will be constructed similar to other existing Ontario nuclear power generation stations. Instead, it is anticipated that some switching equipment within the project area will be owned and operated by OPG and an offsite switching station will be owned and operated by Hydro One Networks Inc. Equipment owned by Hydro One is outside of the scope of the NNW Project and will be subject to its own set of regulatory requirements and approvals. OPG cannot perform meaningful alternative means analysis for equipment that is not within OPG's care and control, hence, the project element considered for alternative means analysis must be limited to switching equipment within the project area.
62	2.8.4 - Alternatives means of carrying out the project	Address key project elements in its alternative means analysis, including, but not limited to, the following: [...] • route or corridor and means options for linear components (e.g. transmission lines, roads, railways); • Width of the right-of-way;	Address key project elements in its alternative means analysis, including, but not limited to, the following: [...] • Onsite route or corridor and means options for linear components (e.g. transmission lines, roads, railways), **including widths of new onsite and site boundary rights-of way where applicable;** • ~~Width of the right-of-way;~~	OPG is proposing modifications to align inclusion of information on widths of rights-of-way with alternative means options for linear components, where applicable. This includes the onsite components and description for the interface at the site boundary.
63	3 - Description of Engagement with First Nation and Other Indigenous Communities	Additionally project-specific requirements have been identified during consultation and engagement activities carried out to date. In addition to the standard requirements, the Impact Statement must:	Additionally, project-specific requirements have been identified during consultation and engagement activities carried out to date. In addition to the standard requirements, the Impact Statement ~~must~~ **should**:	OPG is proposing the replacement of "**must**" to "**should**". The rationale for each of the bullets included is as follows: Bullet 1: Reconciling varying views among multiple First Nations can be challenging and, in some cases, may not be feasible. OPG also notes that some outcome-based commitments may not be fully within OPG's control. Bullet 2-4: As indicated in Section 2.2 (II) of this document, OPG is proposing additional text "should" to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement. "Should" supports meaningful incorporation where feasible while

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				allowing projects to proceed with documented rationale when constraints exist. Bullet 5: If Indigenous Knowledge is shared with OPG, Rights-holding First Nations and interested Indigenous communities may not want this knowledge written down and shared. A replacement from "must" to "should" would clarify that incorporation and disclosure of Indigenous Knowledge is permission-based reflecting Section 2.2 (II) of this document. Bullet 7: Indigenous Community timelines may be extremely different then OPG timelines. A "must" standard could be unworkable where timelines cannot be aligned, whereas "should" allows OPG to make best efforts to accommodate community processes while managing critical path requirements.
64	3 - Description of Engagement with First Nation and Other Indigenous Communities	Describe how the proponent engaged with First Nations and other Indigenous communities early and throughout the impact assessment process to understand potential impacts of the project on Indigenous Peoples and their rights.	Describe how the proponent engaged with First Nations and other Indigenous communities early and throughout the impact assessment process to understand potential impacts of the project on Indigenous Peoples and their rights and to incorporate Indigenous Knowledge, **where provided and where permission is granted for its use and disclosure.** Engagement must be carried out in good faith in a manner that is attentive to the concerns of First Nations and other Indigenous communities and recognizing the wide diversity of Indigenous Peoples. The project should be designed to avoid and minimize potential adverse impacts and, and to maximize positive impacts on First Nations and other Indigenous communities and their rights on;	As indicated in Section 2.2 (II), OPG is proposing additional text "where provided and where permission is granted for its use and disclosure" to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement.
65	3 - Description of Engagement with First Nation and Other Indigenous Communities	Describe the proponent's approach to seek and support First Nations and other Indigenous communities' respective decisions about their free, prior, and informed consent (FPIC)5 for the project and how the proponent intends to continue discussions as the project progresses through the impact assessment process	~~Describe the proponent's approach to seek and support First Nations and other Indigenous communities' respective decisions about their free, prior, and informed consent (FPIC)[5] for the project and how the proponent intends to continue discussions as the project progresses through the impact assessment process;~~ **The Crown is responsible to consult and where appropriate, accommodate as well as aim to secure FPIC where appropriate for Crown decisions.**	OPG is proposing the additional text to clarify proponent's role versus the Crown's responsibilities for consultation and seeking FPIC in relation to Crown decisions.
66	3 - Description of Engagement with First Nation and Other Indigenous Communities	Clearly outline the proposed waste management plan for the project and demonstrate efforts to engage with First Nations and other Indigenous communities with rights and interests may be affected in relation to potential locations in Canada under consideration for waste management activities in relation to the project.	Clearly outline **options considered as part of** the proposed waste management plan for the project and demonstrate efforts to engage with First Nations and other Indigenous communities with rights and interests that may be affected in relation to **the NNW Project.** ~~potential locations in Canada under consideration for waste management activities in relation to the project.~~	OPG is proposing additional text to clarify the intended scope of activities considered as part of the NNW Project. Information shared by Rights-holding First Nations and interested Indigenous communities through engagement efforts will be included where provided for this use aligned with Section 2.2 (II).
67	4 - Assessment Methodology	In addition to the standard requirements, the Impact Statement **must** also:	In addition to the standard requirements, the Impact Statement ~~must~~ **should** also:	OPG is proposing that 15 Bullet points found under the "**must**" requirement change to "**should**". As indicated in Section 2.2 (II) of this document, OPG is proposing additional text to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement.

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				Bullet 1: Assessing cumulative effects in relation to a First Nation's "ability/capacity" relies on community-specific information (governance capacity, resourcing, priorities, ongoing initiatives, and internal constraints) that OPG may not have access to or authority to validate. Any assessment would require information-sharing and confirmation by the Nation and may remain incomplete where that information is unavailable or not appropriate to disclose. Bullet 2: Where provided for this use, as indicated in Section 2.2 (II), OPG will consider data shared from Rights-holding First Nations and interested Indigenous communities who may choose not to share information for use in the Impact Statement. Bullet 3: Where provided for this use, as indicated in Section 2.2 (II), OPG will consider data shared from Rights-holding First Nations and interested Indigenous communities who may choose not to share information for use in the Impact Statement Bullet 4: As indicated in Section 2.2 (II) of this document, OPG is proposing tailoring of this text to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement or collaborate on data collection and analysis. Bullet 6: Fully defining "pre-colonial baseline conditions for First Nations" is not attainable and would rely on Rights-holding First Nations and interested Indigenous communities willingness to share information. As indicated in Section 2.2 (II) OPG will consider data shared from Rights-holding First Nations and interested Indigenous communities, noting Indigenous groups may choose not to share information for use in the Impact Statement. Bullet 7-11: OPG is proposing removal of the term "Relatives". As indicated in Section 2.2 (III) of this document, it is OPG's understanding that the use of chosen terms such as 'Relatives' is not appropriate; OPG recognizes that such characterization would need to be assessed by Rights-holding First Nations and interested Indigenous communities who may choose not to share information for use in the Impact Statement.
68	4.0 – Assessment Methodology	Assess the projects likely cumulative effects in relation to the ability of Indigenous Peoples to exercise their rights. The proponent should work with First Nations and other Indigenous communities to determine which section within the Impact Statement this assessment is best suited to be included in.	Assess the projects likely cumulative effects in relation to the ability of Indigenous Peoples to exercise their rights. The proponent should work with First Nations and other Indigenous communities to determine which section within the Impact Statement this assessment is best suited to be included in **and aligned with the uses indicated by each Indigenous group sharing information or input.**	As indicated in Section 2.2 (II), OPG is proposing additional text to reflect that "The IS must" statements that include input by Indigenous groups can only be satisfied where Indigenous groups are able to and wish to share information and input.
69	4.0 – Assessment Methodology	Where provided, consider pre-colonial baseline conditions for First Nations' and other Indigenous communities' impacts, include community descriptions of current barriers to exercising rights and responsibilities, existing disturbances	Where provided, **and consistent with the permitted uses identified by First Nations and other Indigenous communities sharing information or input (and where appropriate to offer context to potential project effects on a VC),** consider pre-	As indicated in Section 2.2 (II), OPG is proposing additional text to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement. The proposed text would also allow the

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		that constrain access, and areas valued for restoration, reconnection, and care of Relatives, to support cumulative effects and future-scenario analysis;	colonial baseline conditions for First Nations' and other Indigenous communities' impacts, include community descriptions of current barriers to exercising rights and responsibilities, existing disturbances that constrain access, and areas valued for restoration, reconnection, and care of **species** ~~Relatives~~, to support cumulative effects and ~~future-scenario~~ **project effects** analysis;	application to VCs, where appropriate. "The IS must" statements that include input by Indigenous groups can only be satisfied where Indigenous groups are able to and wish to share information and input. OPG is proposing removal of the term "Relatives". As indicated in Section 2.2 (III) of this document, it is OPG's understanding that the use of chosen terms such as 'Relatives' is not appropriate; OPG recognizes that such characterization would need to be assessed by Rights-holding First Nations and interested Indigenous communities who may choose not to share information for use in the Impact Statement.
70	4.0 – Assessment Methodology	Include First Nation and other Indigenous communities-identified pathways of impact to rights, responsibilities to lands and Relatives, cultural continuity, wellbeing, safety, and sense of place, and use these pathways inform scoping, modelling, and interpretation;	**Where provided, and consistent with the permitted uses identified by First Nations and other Indigenous communities sharing information or input,** include ~~First Nation and other Indigenous communities-~~identified pathways of impact to rights, responsibilities to lands and ~~Relatives~~ **species**, cultural continuity, wellbeing, safety, and sense of place, and use these pathways inform scoping, modelling, and interpretation;	As indicated in Section 2.2 (II), OPG is proposing modifications to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement. Additionally, it is OPG's understanding that the MS-WTFNs intend to pursue a MS-WTFNs led Impact Assessment for the NNW Project as noted by MS-WTFNs in Section 2.3 of the Initial Project Description. As noted in Section 7.0 of the Draft TISG, outcomes or information from the MS-WTFNs led assessment can be brought forward into the Impact Assessment and decision making phases of the impact assessment by the proponent and/or MS-WTFNs in order to support the requirements of the Impact Assessment Act, the Crown's duty to consult and to inform the Impact Assessment Act and LTPS decisions. OPG is proposing removal of the term "Relatives". As indicated in Section 2.2 (III) of this document, it is OPG's understanding that the use of chosen terms such as 'Relatives' is not appropriate; OPG recognizes that such characterization would need to be assessed by Rights-holding First Nations and interested Indigenous communities who may choose not to share information for use in the Impact Statement.
71	4.0 – Assessment Methodology	Include criteria and benchmarks for significance determinations, when describing perspectives and tolerance levels of First Nations and other Indigenous communities, co-developed with interested communities, to reflect community thresholds and interpretations of impact severity, duration and consequence, including considerations of cultural continuity, wellbeing and intergenerational effects. Incorporating defined thresholds and interpretations of non-negligible impacts as defined by First Nations and other Indigenous communities, and include explicit documentation of how First Nations and other Indigenous communities input influenced conclusions;	**Where provided, and consistent with the permitted uses identified by First Nations and other Indigenous communities sharing information or input,** include criteria and benchmarks for significance determinations, when describing perspectives~~ and tolerance levels~~ of First Nations and other Indigenous communities, **and where feasible,** co-developed with interested communities, to reflect community thresholds and interpretations of impact severity, duration and consequence, including considerations of cultural continuity, wellbeing and intergenerational effects. **Where provided,** ~~Incorporating~~ **incorporate** defined thresholds and interpretations of non-negligible impacts as defined by First Nations and other Indigenous communities, and include explicit documentation of	As indicated in Section 2.2 (II), OPG is proposing modifications of this requirement to reflect that in some cases the Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement. In addition, 'tolerance levels' may be interpreted as requiring participants to articulate quantitative thresholds or limits of acceptability when in practice, perspectives and concerns are often context dependent and may not be appropriately or consistently expressed as a tolerance level. It is OPG's understanding that the MS-WTFNs intend to pursue a MS-WTFNs led Impact Assessment for the NNW Project as noted by MS-WTFNs in Section 2.3 of the Initial Project Description. As noted in Section 7.0 of the Draft TISG, outcomes or information from the MS-WTFNs led assessment can be brought forward into the Impact

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			how First Nations and other Indigenous communities input influenced conclusions;	Assessment and decision making phases of the impact assessment by the proponent and/or MS-WTFNs in order to support the requirements of the Impact Assessment Act, the Crown's duty to consult and to inform the Impact Assessment Act and LTPS decisions.
72	4.0 – Assessment Methodology	Include mitigation measures developed in collaboration with First Nations and other Indigenous communities in considering which measures are required to mitigate effects, particularly to culturally important Relatives and landscapes. The proponent must consider an avoidance-first approach where First Nations and other Indigenous communities identify Relatives of specific interest or concern to them or places. First Nations and other Indigenous communities should be involved in defining required mitigation, adequacy, and thresholds where mitigation is considered insufficient;	Include mitigation measures developed in collaboration with First Nations and other Indigenous communities in considering which measures are required to mitigate effects, particularly to culturally important **species** ~~Relatives~~ and landscapes **or identify the process to continue development of adaptive management strategies through the IA, follow-up monitoring and/or future licensing stages.** The proponent ~~must~~ **will** consider an avoidance-first approach where ~~First Nations and other Indigenous communities identify~~ **feasible, where residual adverse effects are identified to species** ~~Relatives~~ **or places** of specific interest or concern to them~~ or places~~. First Nations and other Indigenous communities should be involved in defining required mitigation, ~~adequacy, and thresholds where mitigation is considered insufficient;~~	OPG is proposing modifications to focus mitigation discussions to occur when there are anticipated adverse effects and recognize that these discussions may extend beyond the Impact Statement into follow up monitoring or later licensing stages. OPG is proposing removal of the term "Relatives". As indicated in Section 2.2 (III) of this document, it is OPG's understanding that it is not appropriate to use chosen terms such as 'Relatives'. OPG recognizes that such characterization would need to be assessed by Rights-holding First Nations and interested Indigenous communities who may choose not to share information for use in the Impact Statement.
73	4.0 – Assessment Methodology	Integrate First Nation and other Indigenous community-led cumulative effects work (as available), including defined scenarios, stressors, and future-without-project conditions. Consider First Nation and other Indigenous community interpretations of existing cumulative impacts and acceptability related to the effects of the project.	Integrate First Nation and other Indigenous community-led cumulative effects work (as available), ~~including defined scenarios, stressors, and future-without-project conditions~~. Consider First Nation and other Indigenous community interpretations of existing cumulative impacts **consistent with the permitted uses identified by each Indigenous group sharing information or input** ~~and acceptability related to the effects of the project.~~	OPG is proposing modifications to remove specificity on the potential scopes of Rights-holding First Nations and interested Indigenous community-led cumulative effects work and adding language to reflect that inclusions will be consistent with the permitted uses indicated identified by each Rights-holding First Nation and interested Indigenous community sharing information or input. As outlined in Section 2.2 (II, V), following discussion with each First Nation and other Indigenous community sharing information or input, evaluation of how "without the project" discussions materially contribute to understanding mitigation measures, extent to which likely adverse federal effects are significant, and follow-up requirements would inform how cumulative effects work would be documented in the IS.
74	4.0 – Assessment Methodology	The proponent should also: Define and apply criteria and relevant benchmarks with First Nations and other Indigenous communities, including but not limited to the description of effects on Indigenous Peoples. Criteria may include those identified in Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples and other relevant criteria proposed by an Indigenous Nation and community. These criteria should be applied to determine the extent to which adverse effects on Indigenous Peoples are significant.	The proponent should also: Define and apply criteria and relevant benchmarks ~~with First Nations and other Indigenous communities~~, **consistent with the permitted uses identified by each First Nation or other Indigenous community sharing information or input,** including but not limited to the description of effects on Indigenous Peoples. Criteria may include those identified in Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples and other relevant criteria proposed by an Indigenous Nation and community. ~~These criteria should be applied to determine the extent to which adverse effects on Indigenous Peoples are significant.~~ **As per Section 7.0, the proponent must respect each First Nation or other Indigenous community's preferences for assessing impacts, and discuss with each First Nation or other Indigenous community whether it is appropriate for the proponent to provide its own conclusions regarding (residual and cumulative) impacts on**	OPG is proposing modifications to align with the statements in Section 7.0 around conclusions regarding (residual and cumulative) impacts on Indigenous Peoples and their Rights.

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			Indigenous People and their rights. If a First Nation or Indigenous community has provided their own conclusion, the proponent is not required to provide one.	
75	5.2 – Geology, geochemistry and geological hazards	The baseline information should address the criteria contained in the following documents in the Compendium: sections 3.5.5 and 3.5.6 and appendices C.3.4 and C.3.5 in REGDOC-1.1.1 [3]; section B.4.1 in REGDOC-2.9.1 [16]; Appendix A to Part 100 in NRC Regulations (10 CFR) [21]; CSA N289.2 [20]; CSA N289.3 [22]; International Atomic Energy Agency NS-G-3.6 [23]; and International Atomic Energy Agency NS-R-3 (Rev1) [24].	The baseline information should address the criteria contained in the following documents in the Compendium: sections 3.5.5 and 3.5.6 and appendices C.3.4 and C.3.5 in REGDOC-1.1.1 [3]; section B.4.1 in REGDOC-2.9.1 [16]; ~~Appendix A to Part 100 in NRC Regulations (10 CFR) [21];~~ CSA N289.2 [20] **and** CSA N289.3 [22]; International Atomic Energy Agency NS-G-3.6 [23]; and International Atomic Energy Agency NS-R-3 (Rev1) [24] **should be used as guidance.**	OPG is proposing modifications to this text as compliance should be based on applicable CNSC regulatory documents and CSA standards, not U.S. NRC regulations. IAEA safety standards may be used as guidance, which is consistent with the general regulatory approach described in REGDOC-1.1.1.
76	5.2.1 – Baseline Conditions	Describe the geomorphology, topography and geology of areas proposed for the project;	Describe the ~~geomorphology, topography and~~ geology of areas proposed for the project;	OPG is proposing removal of "geomorphology" and "topography" from this requirement. These are already considered under Section 5.3 Topography.
77	5.3.1 – Baseline conditions	The baseline information should address appropriate federal and provincial guidelines and the criteria contained in the following documents in the Compendium: [25]; [26]; and [27].	The baseline information should address appropriate federal and provincial guidelines and the criteria contained in the following documents in the Compendium: [25]; [26]; and [27] **as well, screen baseline sediment quality data against applicable guidelines, including from CCME ~~[39]~~ CEQG [39], and Ontario [40];** **If an appropriate baseline study demonstrates that natural background exceeds the available standards or guidelines (or that none exist for the contaminants of potential concern (COPC[6]) of interest), sediment quality benchmarks from the peer-reviewed scientific literature should be used with appropriate rationale;**	OPG is proposing additional text to incorporate input related to sediment quality in one section- shifted from Section 5.7. CCME reference to be updated to reflect the correct source links in the current Compendium (two source [39] are shown).
78	5.3.2 –Effects to topography, soil and sediment	The Impact Statement must describe all effects of the project on topography, soil and sediment including: • potential and likelihood of problematic erosion from movement or redistribution of soil and overburden, vegetation clearing, and watercourse diversions;	The Impact Statement must describe all effects of the project on topography, soil and sediment including: • potential **for** and likelihood of **soil** ~~problematic~~ erosion **(e.g., wind, water) resulting** ~~movement or redistribution of soil and overburden, vegetation clearing, and watercourse diversions~~ from terrain disturbance, removal of vegetation, exposure of soil and overburden, or changes to landform stability associated with project activities.	OPG is proposing modifications to remove 'problematic erosion' perceived as being a project effect.
79	5.5 – Electromagnetism and corona discharge	The Impact Statement must: • describe ozone concentrations;	The Impact Statement must: • ~~describe ozone concentrations;~~	OPG is proposing to remove the requirement to describe ozone concentrations as a result of corona discharge. Existing studies indicate that the impact of transmission equipment on local ozone levels is negligible. Please see below web-links to commentary on ozone level concentration as a result of corona discharge: 1. Ozone concentration variations near high-voltage transmission lines: https://www.tandfonline.com/doi/pdf/10.3846/1648-6897.2009.17.28-35 (Valuntaite, Šerevičiene, & Girgždiene, 2009) 2. PG&E Proponent Environmental Assessment, Chapter 16, Section 16.3.1.3: https://ia.cpuc.ca.gov/environment/info/aspen/jefferson_martin/pea-toc.htm (State of California - Public Utilities Commission, 2002)

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80	5.5 – Electromagnetism and corona discharge	The Impact Statement must: • describe predicted electromagnetic field levels;	The Impact Statement must: • ~~describe predicted electromagnetic field levels;~~	OPG is proposing to remove the requirement to describe predicted electromagnetic field levels. Electric and Magnetic Fields (EMFs) are found everywhere electricity is used, including home appliances, computers, office equipment, wiring in our homes and workplaces, and electric power facilities such as substations and transmission or distribution lines. Based on global studies which continue to be regularly monitored, these organizations indicate that members of the public do not need to take precautions to protect from fields produced by extremely low frequencies such as transmission lines. Please see attached below, web-links to informational pages from Health Canada and the World Health Organization on EMF. 1. https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/everyday-things-emit-radiation/power-lines-electrical-appliances.html (Government of Canada, 2022) 2. https://www.who.int/news-room/questions-and-answers/item/radiation-electromagnetic-fields (World Health Organization, 2016)
81	5.5 – Electromagnetism and corona discharge	The Impact Statement must: • evaluate electromagnetic emitters in the region during operations, with respect to their potential to affect the safe operation of the reactor facility.	The Impact Statement must: • ~~evaluate electromagnetic emitters in the region during operations, with respect to their potential to affect the safe operation of the reactor facility.~~	OPG is proposing the removal of this requirement as part of Section 5.5, "Electromagnetism and Corona Discharge" as it is duplicative to a requirement found in Section 9, " Effects of Potential Accidents or Malfunctions". The following requirement found in Section 9.1 will be met: "identify all external, non-malevolent, human-induced events over the lifecycle of the proposed project applying a systematic approach in accordance with REGDOC-1.1.1 Sections 3.6.1 to 3.6.4 [3]. Examples of such events include aircraft crashes, other transportation hazards, fires and explosions, chemical and radiological hazards, and electromagnetic interference hazards; and" (Canadian Nuclear Safety Commission, 2025)
82	5.5 – Electromagnetism and corona discharge	The Impact Statement must: • identify the potential for electromagnetic interference with radio, television or other telecommunication signals and reception at maximum loading and describe the area potentially affected, the frequency and duration of occurrence and any applicable standards;	The Impact Statement must: • identify the potential for electromagnetic interference with radio, television or other telecommunication signals and reception at maximum ~~loading~~ **output** and describe the **spatial extent of the** area potentially affected, the **persistence** ~~frequency and duration~~ of occurrence and any applicable standards;	OPG is proposing modifications to be more specific to the assessment. Replacing "loading" with "output" is more precise for power generation. Replacing "frequency and duration" with "persistence" acknowledges that the source is constant, and not intermittent with attributed frequency.
83	5.6.1 –Baseline conditions	Provide baseline ambient air concentrations for contaminants, in particular near key receptors (e.g. communities, traditional land users, wildlife) and quantify emission sources for the following: • polycyclic aromatic compounds, including polycyclic aromatic hydrocarbons (PAHs), alkylated PAHs, PAH transformation products, including nitro and oxy-PAHs, and dibenzothiophenes;	Polycyclic aromatic compounds, including polycyclic aromatic hydrocarbons (PAHs - **specifically B(a)P),** ~~alkylated PAHs, PAH transformation products, including nitro and oxy-PAHs, and dibenzothiophenes;~~	OPG is proposing removal of Alkylated PAHs, PAH Transformation Products (Nitro-PAHs and Oxy-PAHs), and Dibenzothiophenes. PAHs in air are proposed to be measured using benzo(a)pyrene (BaP) as a surrogate for total PAH, in accordance with the Ontario Ministry of the Environment, Conservation and Parks (MECP) Ambient Air Quality Criteria (AAQC) (Ministry of the Environment, Conservation and Parks, 2025).

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				Priority (parent) PAHs are currently being measured via PUF sampling using established reference methods (e.g., USEPA Compendium Method TO-13A), which are the recognized indicators of combustion-related PAH exposure in ambient air and are the most interpretable for baseline characterization, effects assessment, and Human Health Risk Assessment (HHRA) purposes. Alkylated PAHs, PAH transformation products (nitro-PAHs and oxy-PAHs), and dibenzothiophenes are secondary or derivative compounds that do not have Ontario AAQCs or Federal CAAQS (Canadian Council of Ministers of the Environment, 2025) and are not included within accepted ambient air reference methods, limiting their regulatory interpretability and applicability in HHRA screening. The MECP applies benzo[a]pyrene (BaP) as a surrogate for total PAH carcinogenicity. BaP is generally considered the most toxic reference PAH and is commonly carried forward into HHRA using toxic equivalency factor (TEF) approaches, consistent with Canadian regulatory practice.
84	5.6.1 –Baseline conditions	diesel particulate matter;	~~diesel particulate matter;~~	OPG is proposing removal of this requirement. Continuous PM2.5 monitoring is proposed to be used as a surrogate for diesel related particulate matter. Continuous PM2.5 monitoring is widely accepted as a conservative and practical surrogate for diesel-related particulate influences, as diesel exhaust particles are predominantly within the fine and ultrafine size fractions. This approach has been applied in recent Canadian IAs, including the Denison Wheeler River EIS submitted to the CNSC. Diesel particulate matter does not have a defined Ontario AAQC (Ministry of the Environment, Conservation and Parks, 2025) or Federal CAAQS (Canadian Council of Ministers of the Environment, 2025). While Health Canada has derived health-based guidance values for diesel exhaust particulate under a risk-assessment framework, these values are not applied as ambient air quality standards or routine baseline monitoring criteria. PM2.5, monitoring provides a conservative and well-established basis for baseline and HHRA applications, as per Section 6.6.1 of (Health Canada, 2023a).
85	5.6.1 – Baseline conditions	Provide baseline ambient air concentrations for contaminants, in particular near key receptors (e.g. communities, traditional land users, wildlife) and quantify emission sources for the following: • nuclear emissions including tritium oxide and tritium gas, carbon 14, noble gases, iodine-131, and particulates;	Provide baseline ambient air concentrations for contaminants, in particular near key receptors (e.g. communities, traditional land users, wildlife) and quantify emission sources for the following: Nuclear emissions including tritium oxide ~~and tritium gas,~~ carbon 14~~, noble gases, iodine-131,~~ and particulates;	OPG is proposing to include measurements of tritium oxide, carbon-14, particulates, and external gamma (TLDs) for establishing baseline radiological contaminants in air, and propose to revise this clause to clarify that tritium gas, noble gases, and iodine-131 will not be specifically measured in baseline ambient air. These are not typically monitored in environmental media and are only monitored directly in emissions at operating nuclear plants. They are not expected to be measurable at the NNW site as there are no nearby emission sources.

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				These contaminants will be discussed qualitatively where applicable, including discussion of any regional emission sources.
86	5.6.1 – Baseline conditions	provide baseline ambient air concentrations for contaminants, in particular near key receptors (e.g. communities, traditional land users, wildlife) and quantify emission sources for the following: • hydrazine; • morpholine	~~hydrazine~~ ~~morpholine~~	OPG is proposing removal of this requirement to clarify that hydrazine and morpholine will not be specifically measured in baseline ambient air. For hydrazine and morpholine, OPG proposes to discuss their impact qualitatively, with discussion of potential emissions sources in the region, but excluded from baseline monitoring for the following reasons. • There are no validated reference methods for long-term, low-level ambient air monitoring of hydrazine or morpholine. These compounds are not included in the USEPA Compendium of Methods for the Determination of Ambient Air Toxics, and available methods are optimized for short-duration, higher-concentration (mg/m^3-scale) occupational or process monitoring (e.g., NIOSH Method 2535) and are not suitable for achieving the low method detection limits required for extended-duration ambient monitoring or regulatory screening against Ontario AAQCs at $\mu g/m^3$-scale concentrations (Ministry of the Environment, Conservation and Parks, 2025). • Hydrazine and morpholine are not monitored under Canadian federal or provincial ambient air quality programs (e.g., NAPS or provincial networks) and do not have Ontario AAQCs or Federal CAAQS (Canadian Council of Ministers of the Environment, 2025), although they are included in the MECP Environmental Compliance Approvals – Air Contaminants Benchmarks List for permitting purposes (Ministry of the Environment, Conservation and Parks, 2026). • The future NNW Project may use hydrazine or morpholine in secondary or ancillary systems (e.g., boiler or feedwater chemistry, pH control, corrosion protection); however, any such use would not be expected to represent a primary or continuous emission source. Outside of the Darlington and Pickering nuclear generating stations, where these compounds may be used and released in controlled quantities, no other significant ambient air emission sources for these compounds are known to be present in the region. • Where relevant, hydrazine and morpholine can be addressed through emissions estimation and dispersion modelling, on the basis that baseline ambient concentrations are expected to be very low or not readily measurable.
87	5.6.1 – Baseline conditions	Provide baseline ambient air concentrations for contaminants, in particular near key receptors (e.g. communities, traditional land users, wildlife) and quantify emission sources for the following: • PFAS	~~PFAS~~	OPG is proposing that PFAS be excluded from the baseline ambient air quality monitoring program and addressed qualitatively in the Impact Statement. PFAS are generally characterized by low volatility and a tendency to be particle-bound; therefore, detectable concentrations in baseline air conditions are not expected. Furthermore, neither PFAS compounds nor PFAS as a class have an

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				Ontario AAQC (Ministry of the Environment, Conservation and Parks, 2025) or Federal CAAQS (Canadian Council of Ministers of the Environment, 2025). Additionally, validated and standardized methods for measuring PFAS in ambient outdoor air do not currently exist. While the USEPA has developed draft, performance-based methods for stack emission testing from stationary sources (United States Environmental Protection Agency, 2025), these methods have not been validated for ambient air monitoring applications. Similarly, ASTM D8560-24 (Advancing Standards Transforming Markets, 2024) provides guidance for measuring PFAS in indoor air but explicitly states that the described methods are not validated for ambient outdoor air conditions.
88	5.6.1 – Baseline conditions	Provide baseline ambient air concentrations for contaminants, in particular near key receptors (e.g. communities, traditional land users, wildlife) and quantify emission sources for the following: • ammonia	~~ammonia~~	OPG is proposing that ammonia be discussed qualitatively, with discussion of potential emissions sources in the region, but excluded from baseline monitoring. • Ammonia is an important precursor to secondary $PM_{2.5}$ formation, and its potential health relevance is appropriately evaluated through measured or modelled $PM_{2.5}$ concentrations, which inherently capture contributions from ammonia-derived secondary particulate matter. • While ammonia does have a health-based ambient air quality criterion reflecting its potential for short-term irritative effects at elevated concentrations, it is not typically a primary focus of baseline ambient air monitoring unless project-specific emission sources are anticipated. • Regional ammonia sources are expected to be dominated by agricultural activities (e.g., fertilizer application, manure management, livestock operations), with potential contributions from more distant industrial facilities (e.g., the Cameco PHCF, approximately 9 km from the site). • The future Project may use ammonia in secondary or ancillary systems (e.g., pH control or corrosion protection); however, any such use is not expected to represent a primary or continuous emission source. • Where relevant, ammonia can be addressed through emissions estimation and dispersion modelling, on the basis that baseline ambient concentrations are expected to be low.
89	5.6.1 – Baseline conditions	Describe dust and acid deposition through either existing long-term or new monitoring data for a duration of a minimum of one year;	Describe **Project-specific** dust and acid deposition rates through **dispersion modelling using conservative parameterization and multi-year meteorological datasets;** ~~either existing long-term or new monitoring data for a duration of a minimum of one year;~~	OPG is proposing to remove baseline dustfall and acid deposition monitoring. Dust deposition will be characterized in the effects assessment with the CALPUFF model using the dry deposition algorithm with conservative particle characteristics/ assumptions. Acid deposition will be characterized using CALPUFF's chemical transformation module to convert primary emissions to secondary acid-forming species (SO_2 to SO_4^{2-}; NO_x to HNO_3 and NO_3^-), with subsequent dry deposition and wet scavenging estimated at key receptors. Both approaches provide spatially resolved, source-apportioned deposition fields across the full receptor network - a level

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				of coverage and source attribution that passive deposition monitoring cannot replicate.
90	5.6.1 – Baseline conditions	Provide current ambient noise and vibration levels at key receptor points (e.g. communities, traditional land users, sensitive human receptors and wildlife), including the results of a baseline ambient noise and vibration survey and permissible noise levels for each receptor. The information on usual noise and vibration sources (natural or anthropogenic), their geographic extent and temporal variations must be included. At the time of collecting baseline data for the study on ambient noise and vibrations where there are human receptors, it is recommended that the following aspects be considered:	Provide current ambient noise ~~and vibration~~ levels at key receptor points (e.g. communities, traditional land users, sensitive human receptors and wildlife), including the results of a baseline ambient noise ~~and vibration~~ survey and permissible noise levels for each receptor. The information on usual noise and vibration sources (natural or anthropogenic), their geographic extent and temporal variations must be included. At the time of collecting baseline data for the study on ambient noise ~~and vibrations~~ where there are human receptors, it is recommended that the following aspects be considered:	Given the absence of any notable vibration sources, OPG is proposing excluding vibration measurements from the baseline data collection program and instead addressing it in the effects assessment. There are no notable or sustained natural or anthropogenic sources of vibration in the project/surrounding area, meaning any baseline measurements would be expected to return imperceptible or near-zero readings. Vibrations can instead be addressed in the effects assessment using a conservative assumption of imperceptible or near-zero ambient conditions.
91	5.6.1 –Baseline conditions	Provide current underwater soundscape and vibration sources, within the study areas and at the project site, based on acoustic measurements. Provide information on vibration and sound sources, geographic extent and spatial and temporal variations within the water column and at the lake bed;	~~Provide current underwater soundscape and vibration sources, within the study areas and at the project site, based on acoustic measurements. Provide information on vibration and sound sources, geographic extent and spatial and temporal variations within the water column and at the lake bed;~~	OPG is proposing underwater measurements be excluded from the baseline data collection program. There are no notable or sustained anthropogenic noise and vibration sources in the project/surrounding area. The assessment of effects of project-related underwater noise and vibration would use a conservative assumption of imperceptible or near-zero ambient conditions.
92	5.6.2 –Effects on the atmospheric, acoustic, and visual environment	Conduct a source contribution analysis to assess the relative contributions of project and non-project emission sources on pollutant concentrations at key receptors. The source contribution analysis should be conducted for all pollutants that exceed 10% of the relevant guidance or standard value. Emission sources should be grouped into appropriate categories;	Conduct a source contribution analysis to assess the relative contributions of project ~~and non-project~~ emission sources ~~on~~ **to predicted** pollutant concentrations at key receptors. **The analysis should be conducted for all pollutants where predicted concentrations exceed 10% of the applicable ambient air quality standard or guideline. Project emission sources should be grouped into operationally meaningful categories. Non-project contributions will be represented by ambient baseline monitoring data, supplemented by available provincial resources, with qualitative discussion of likely contributing sources. and non-project emission sources on pollutant concentrations at key receptors.** ~~The source contribution analysis should be conducted for all pollutants that exceed 10% of the relevant guidance or standard value. Emission sources should be grouped into appropriate categories;~~	OPG is proposing modifications to limit the source contribution analysis scope to project emission sources and exclude non-project sources in assessing relative contributions to predicted pollutant concentrations at key receptors. Project sources will be grouped into operationally meaningful categories. Non-project contributions will be represented by ambient baseline monitoring data collected on-site, supplemented by available provincial resources (e.g., provincial emissions inventories, NPRI data, regional air quality reports) to qualitatively assess source apportionment where applicable.
93	5.6.2 – Effects on the atmospheric, acoustic, and visual environment	Provide the hourly distribution of baseline night-time sound events compared to the individual nighttime sound events expected at each receptor location;	**Assess the change in night-time sound levels as result of the project at receptor locations.** ~~provide the hourly distribution of baseline night-time sound events compared to the individual nighttime sound events expected at each receptor location;~~	OPG is proposing to establish baseline night-time sound level from the baseline sound monitoring campaign, to be applied at each receptor as the baseline against which project noise contributions are assessed. Presenting an hourly comparison of baseline monitoring data against predicted project sound levels would not add analytical value, as the predicted levels represent a worst-case hour while the baseline data reflect variable conditions across discrete monitoring periods. A single conservative baseline value (i.e., L90 or Leq) applied at each receptor provides a clearer, more protective basis for comparison, and is consistent with Health Canada and Ontario MECP guidelines (Health Canada, 2023b), (Ministry of the Environment, Conservation and Parks, 2013).

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94	5.6.2 – Effects on the atmospheric, acoustic, and visual environment	Provide a description of any changes in nighttime light levels resulting from the project: • quantify light levels at appropriate distances from any project facilities, including the timing (e.g. night hours), frequency, duration, distribution and character of light emissions;	Provide a description of any changes in nighttime light levels resulting from the project: • ~~quantify~~ **describe** light levels at appropriate distances from any project facilities, including the timing (e.g. night hours), frequency, duration and distribution ~~and character~~ of light emissions;	OPG is proposing modifications to language to appropriately define this scope reflecting a risk-based approach given the early design phase of the Project. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the IA process or through another regulatory process. OPG would meet the intent of this clause through qualitative characterization of a change in nighttime light levels based on a representative lighting layout, and lighting strategy.
95	5.7.1 – Groundwater and surface water	Quantify the existing surface water conditions, including the full range of seasonal and inter-annual variations, (including variations in inflows, outflows, water surface elevations, net loss, including evaporation and seepage. and storage volumes and retention time), ice cover and snow regime. This may be based on data from on-site gauging stations or from reference regional gauging stations;	Quantify the existing surface water conditions, including ~~the full range of~~ **available** seasonal and inter-annual variations, (including variations in inflows, outflows, water surface elevations, net loss, including evaporation and seepage. and storage volumes and retention time), ice cover and snow regime. This may be based on data from on-site gauging stations or from reference regional gauging stations;	OPG is proposing modifications to provide clarity in how this requirement will be addressed in the Impact Statement. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the Impact Assessment process, or through another regulatory process. Follow-up monitoring, compliance monitoring, future ERAs, and Environmental management programs will be implemented to validate assumptions. Adaptative management measures will be developed where required.
96	5.7.1 – Groundwater and surface water	For Lake Ontario, the description should include the size, location, and elevation of outlets, and elevation-area-capacity curves; and	For Lake Ontario, the description should include the size, location, and elevation of outlets, and elevation-area-capacity curves **where these are influenced by intake or discharge structures;** and	OPG is proposing modification of this requirement to focus level of detail to the area that may be affected by the NNW Project and in alignment with Section C.4.3 of REGDOC-1.1.1.
97	5.7.1 – Groundwater and surface water	For each water body used as a heat sink or process water source, information about maximum, average maximum, average, average minimum, and minimum monthly temperature and monthly flow of the water bodies;	For each water body used as a heat sink or process water source, **provide available information used to understand temperature and flow, (which may include validation of** maximum, average maximum, average, average minimum, and minimum monthly temperature and monthly flow of the water bodies);	OPG is proposing modifications to provide clarity in how this requirement will be addressed in the Impact Statement. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the Impact Assessment process, or through another regulatory process. Follow-up monitoring, compliance monitoring, future ERAs, and Environmental management programs will be implemented to validate assumptions. Adaptative management measures will be developed where required.
98	5.7.1 – Groundwater and surface water	Characterize and describe upwelling and downwelling, including an analysis of duration, frequency, intensity-thermal/spatial and seasonality of these events, in the LSA within Lake Ontario. See Environmental Effects Assessment of Freshwater Thermal Discharge, 2019 [36] for more guidance;	Characterize and describe **large** upwelling and downwelling ~~events, including an~~ **(which may include** analysis of duration, frequency, intensity-thermal/spatial and seasonality of these events), in the LSA within Lake Ontario. See Environmental Effects Assessment of Freshwater Thermal Discharge, 2019 [42] for more guidance;	OPG is proposing modifications to provide clarity in how this requirement will be addressed in the Impact Statement. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the Impact Assessment process, or through another regulatory process. Follow-up monitoring, compliance monitoring, future ERAs, and Environmental management programs will be implemented to validate assumptions. Adaptative management measures will be developed where required.

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99	5.7.1 – Groundwater and surface water	Provide complete hydrometeorological information (temperature, precipitation, evapotranspiration), based on data from nearby weather stations or from a weather station on site;	Provide ~~complete~~ hydrometeorological information (temperature, precipitation, evapotranspiration), based on data **from climate change-adjusted weather fields (for the lake model)** from nearby weather stations or from a weather station on site **for groundwater and inland surface water;**	OPG is proposing modifications to reflect regional modelling scale applicable to analysis in Lake Ontario compared with site-level for groundwater and in-land surface water features.
100	5.7.1 – Groundwater and surface water	Provide flow hydrographs and corresponding water levels for nearby streams and rivers showing the full range of seasonal and inter-annual variations, as well as seasonal baseflow:	Provide flow hydrographs and corresponding water levels for nearby streams and rivers ~~showing the full range of~~ **including** seasonal and inter-annual variations, as well as seasonal baseflow **where available:**	OPG is proposing modifications to provide clarity in how this requirement will be addressed in the Impact Statement. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the Impact Assessment process, or through another regulatory process. Follow-up monitoring, compliance monitoring, future ERAs, and Environmental management programs will be implemented to validate assumptions. Adaptative management measures will be developed where required.
101	5.7.1 – Groundwater and surface water	Provide stage hydrographs for lakes expected to be affected by the project showing the full range of seasonal and inter-annual water level variations;	~~Provide stage hydrographs for lakes expected to be affected by the project showing the full range of seasonal and inter-annual~~ **Describe lake water level variation characteristics (may include stage hydrographs);**	OPG is proposing modifications to provide clarity in how this requirement will be addressed in the Impact Statement. Reflecting that the lake with the potential to be affected by this project is Lake Ontario, this tailoring is intended to allow flexibility on the tools used to best represent the lake water level variation characteristics most material to decision making (e.g., longer term interannual variation patterns). As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the Impact Assessment process, or through another regulatory process. Follow-up monitoring, compliance monitoring, future ERAs, and Environmental management programs will be implemented to validate assumptions. Adaptative management measures will be developed where required.
102	5.7.1 – Groundwater and surface water	Include modelling, such as hydrodynamic modelling, to characterize coastal processes, including a quantitative sediment movement and size spectrum through littoral transport, flow directionality, velocity, and shear stress. Modelling should also examine shoreline recession rates and sediment inputs.	Include modelling, such as hydrodynamic modelling, to characterize coastal processes. **Include** ~~including~~ a quantitative **assessment of potential for** sediment movement and size spectrum through littoral transport, flow directionality, velocity, and shear stress. ~~Modelling~~ **Assessment** should also examine shoreline recession rates and sediment inputs;	OPG is proposing modifications to provide clarity in how this requirement will be addressed in the Impact Statement commensurate with the early design stage of project planning. Follow-up monitoring, compliance monitoring, future ERAs, and Environmental management programs will be implemented to validate assumptions. Adaptative management measures will be developed where required.
103	5.7.1 – Groundwater and surface water	For each waterbody potentially affected by the project, provide bathymetry, maximum and mean depths, vertical profile information, information on stratification and turnover, and sediment composition (e.g. particle size analysis and sediment quality);	For each waterbody potentially affected by the project, provide bathymetry, maximum and mean depths, vertical profile information, information on stratification and turnover, and sediment composition (e.g. particle size analysis and sediment quality) **and/or describe when and how this information may be validated or confirmed through follow up and monitoring programs;**	OPG is proposing modifications to provide clarity in how this requirement will be addressed in the Impact Statement. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the Impact Assessment process, or through another regulatory process. Follow-up monitoring, compliance monitoring, future ERAs, and Environmental management programs will be implemented to validate

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				assumptions. Adaptative management measures will be developed where required.
104	5.7.1 – Groundwater and surface water	Using traditional field and mapping techniques, provide a delineation and characterization of groundwater–surface water interactions, including an identification of groundwater-dependent ecosystems, wetlands, discharge and recharge areas that are potentially affected by the project;	Using traditional field and mapping techniques, provide a delineation and characterization of groundwater–surface water interactions, including an identification of groundwater-dependent ecosystems, wetlands, discharge and recharge areas that are potentially affected by the project **and/or describe when and how this information may be validated or confirmed through follow-up and monitoring programs;**	OPG is proposing modifications to provide clarity in how this requirement will be addressed in the Impact Statement. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the Impact Assessment process, or through another regulatory process. Follow-up monitoring, compliance monitoring, future ERAs, and Environmental management programs will be implemented to validate assumptions. Adaptative management measures will be developed where required.
105	5.7.1 – Groundwater and surface water	Develop a quantitative surface water balance for watersheds potentially affected by the project, for all phases of the project detailing water intake and outfall to the environment, including upstream and downstream of the zones of influence;	Develop a quantitative surface water balance for watersheds potentially affected by the project, for all phases of the project ~~detailing~~ **using estimated** water intake and outfall to the environment, including upstream and downstream of the zones of influence;	OPG is proposing modifications to reflect a risk-based approach to collecting data reflective of an assessment of potential interactions during the Impact Statement phase. Based on the findings of the assessment, predictions can be validated over a longer time period for those effects of concern identified during the Impact Assessment phase.
106	5.7.1 – Groundwater and surface water	Characterization program should include sampling locations within the PA, the LSAs and RSAs, and should include reference locations that are unlikely to be impacted by the project. Provide a detailed map that indicate the sampling locations;	Characterization program should include ~~sampling locations~~ **information** within the PA, the LSAs and RSAs, and should include reference locations that are unlikely to be impacted by the project. Provide a detailed map that indicate the sampling locations;	OPG is proposing modifications to provide clarity in how this requirement will be addressed in the Impact Statement. While specific sampling locations will be indicated and mapped, local and regional information may also be characterized using sources that aggregate information where specific sampling locations may not be specified.
107	5.7.1 – Groundwater and surface water	Provide baseline data for relevant physicochemical parameters and chemical constituents for surface water, groundwater and sediment quality that are expected to change throughout the project lifecycle; including temporal trends and groundwater surface water interactions, representative of seasonal and inter-annual variability and spatial representation relevant to the project components, the LSA and the RSA. The data should be presented in a compiled, tabulated, and graphed form using appropriately sensitive detection limits, and include estimates relevant to the project activities and components.	Provide baseline data for relevant physicochemical parameters and chemical constituents for surface water **and** groundwater ~~and sediment~~ quality that are expected to change throughout the project lifecycle; including **available information** characterizing relevant temporal trends and groundwater surface water interactions, representative of seasonal and inter-annual variability and spatial representation relevant to the project components, the LSA and the RSA. The data should be presented in a compiled, tabulated, and graphed form using appropriately sensitive detection limits, and include estimates relevant to the project activities and components.	OPG is proposing that content related to sediment quality be removed from Section 5.7 (Groundwater and Surface Water) of the Draft TISG and included, as indicated above, in Section 5.3 (Topography, Soil and Sediment) for clarity. OPG is proposing modifications to reflect a risk-based approach to collecting data reflective of an assessment of potential interactions during the Impact Statement phase. Based on the findings of the assessment, predictions can be validated over a longer time period for those effects of concern identified during the Impact Assessment phase.
108	5.7.1 – Groundwater and surface water	Water sample collection and analysis should use appropriately sensitive detection limits and the data should illustrate the seasonal and inter-annual variability in baseline surface water quality with sufficient years of baseline data to fully characterize natural variability, including possible variabilities due to groundwater–surface water interactions; and	Water sample collection and analysis should use appropriately sensitive detection limits **and describe how** ~~and the data should illustrate~~ the seasonal and inter-annual variability in baseline surface water quality **will be considered** ~~with sufficient years of baseline data to fully characterize natural variability~~), including possible variabilities due to groundwater–surface water interactions; and	OPG is proposing modifications to reflect a risk-based approach to collecting data reflective of an assessment of potential interactions during the Impact Statement phase; based on the findings of the assessment, predictions can be validated over a longer time period for those effects of concern identified during the Impact Assessment phase.
109	5.7.1 – Groundwater and surface water	Physical and chemical parameters may include particle size, moisture content metal/metalloids, total sulphur, total organic carbon, polycyclic aromatic compounds, persistent	~~Physical and chemical parameters may include particle size, moisture content metal/metalloids, total sulphur, total organic carbon, polycyclic aromatic compounds, persistent organic~~	OPG is proposing that content related to sediment quality be removed from Section 5.7 (Groundwater and Surface Water) of the

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		organic pollutants. Sediment samples should target silt-clay range (<63 um) and include appropriate replication to describe site heterogeneity.	~~pollutants. Sediment samples should target silt-clay range (<63 um) and include appropriate replication to describe site heterogeneity.~~	Draft TISG and included, as indicated above, in Section 5.3 (Topography, Soil and Sediment) for clarity.
110	5.7.1 – Groundwater and surface water	Screen baseline sediment quality data against applicable guidelines, including from CCME [39], CEQG [39], and Ontario [40];	~~Screen baseline sediment quality data against applicable guidelines, including from CCME [39], CEQG [39], and Ontario [40];~~	OPG is proposing that content related to sediment quality be removed from Section 5.7 (Groundwater and Surface Water) of the Draft TISG and included, as indicated above, in Section 5.3 (Topography, Soil and Sediment) for clarity.
111	5.7.1 – Groundwater and surface water	If an appropriate baseline study demonstrates that natural background exceeds the available standards or guidelines (or that none exist for the contaminants of potential concern (COPC) of interest), sediment quality benchmarks from the peer-reviewed scientific literature should be used with appropriate rationale;	~~if an appropriate baseline study demonstrates that natural background exceeds the available standards or guidelines (or that none exist for the contaminants of potential concern (COPC) of interest), sediment quality benchmarks from the peer-reviewed scientific literature should be used with appropriate rationale;~~	OPG is proposing that content related to sediment quality be removed from Section 5.7 (Groundwater and Surface Water) of the Draft TISG and included, as indicated above, in Section 5.3 (Topography, Soil and Sediment) for clarity.
112	5.7.1 – Groundwater and surface water	Provide a summary of key groundwater monitoring wells within the RSA used to inform the conceptual model, and identify their location, groundwater quality information and monitoring frequency. Provide representative hydrographs showing the range of seasonal and inter-annual water level variations and indicate any spatial variation in the RSA.	Provide a summary of key groundwater monitoring wells within the RSA used to inform the conceptual model, and identify their location, groundwater quality information and monitoring frequency~~. Provide representative hydrographs showing the~~ **Describe** the range of seasonal and inter-annual water level variations and indicate any spatial variation in the RSA **(may include use of representative hydrographs).**	OPG is proposing modifications to reflect a risk-based approach to collecting data reflective of an assessment of potential interactions during the Impact Statement phase; based on the findings of the assessment, predictions can be validated over a longer time period for those effects of concern identified during the Impact Assessment phase.
113	5.7.1 – Groundwater and surface water	Present a 3-dimensional numerical geological model developed for the site, local, and regional study areas based on the conceptual model of the geological environment;	Present a 3-dimensional numerical ~~geological~~ **groundwater flow model** developed for the site, local, and regional study areas based on the conceptual model of the geological environment;	OPG is proposing modifications to specify that it is the groundwater flow model.
114	5.7.1 – Groundwater and surface water	State limitations and assumptions in the modelling approach, including calibration methods, model validation and accuracy; and a description of how uncertainty is quantified;	State limitations and assumptions in the modelling approach, including calibration methods, model validation and accuracy and ~~a description of how uncertainty is quantified~~ **how limitations or assumptions may be validated or confirmed through follow up and monitoring programs;**	OPG is proposing modifications to provide clarity in how this requirement will be addressed in the Impact Statement. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the Impact Assessment process, or through another regulatory process. Follow-up monitoring, compliance monitoring, future ERAs, and Environmental management programs will be implemented to validate assumptions. Adaptative management measures will be developed where required.
115	5.7.1 – Groundwater and surface water	Calibrate the numerical model to baseline geological conditions using groundwater level and stream flow monitoring data and provide metrics and graphs describing the quality of the calibration that was achieved and discuss how spatial variability is considered in model calibration; and	Calibrate the numerical model ~~to baseline geological conditions~~ using groundwater level and stream flow monitoring data and provide metrics and graphs describing the quality of the calibration that was achieved **and/or may be validated or confirmed through follow up and monitoring programs** and discuss how spatial variability is considered in model calibration; and	OPG is proposing modifications to provide clarity in how this requirement will be addressed in the Impact Statement. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the Impact Assessment process, or through another regulatory process. Follow-up monitoring, compliance monitoring, future ERAs, and Environmental management programs will be implemented to validate assumptions. Adaptative management measures will be developed where required.

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116	5.7.1 – Groundwater and surface water	Present a 3-dimensional numerical geological model developed for the site, local, and regional study areas based on the conceptual model of the geological environment;	Add as additional bullet: **where applicable, chemical or isotopic tracer data that provide constraints on fluid direction, flow velocity or mixing should be included;**	OPG is proposing to add an additional bullet to this section to specify that it is the groundwater flow model. See comment #118 for an associated recommendation.
117	5.7.1 – Groundwater and surface water	Present a conceptual model for the hydrological environment, as appropriate to describe baseline conditions for surface waters. The model should be developed to support the assessment of potential changes to water and sediment quantity and quality in rivers, streams, lakes, springs and wetlands, with input from regulators;	Present a conceptual model for the hydrological environment, as appropriate to describe baseline conditions for surface waters. The model should be developed to support the assessment of potential changes to water and sediment quantity and quality in rivers, streams, lakes, springs and wetlands, with input from regulators **as required;**	OPG is proposing additional text to reflect a risk-based approach to collecting data for the assessment of potential effects during the Impact Statement phase. As part of the preparation of Impact Statement, OPG will engage with the regulators, as appropriate.
118	5.7.1 – Groundwater and surface water	Chemical or isotopic tracer data that provide constraints on fluid direction, flow velocity or mixing should be included;	~~Chemical or isotopic tracer data that provide constraints on fluid direction, flow velocity or mixing should be included;~~	As indicated in comment #116, OPG is proposing this requirement is shifted to apply to the groundwater model, aligned with REGDOC-1.1.1 (Canadian Nuclear Safety Commission, 2025).
119	5.7.2 – Groundwater and surface water	Present an integrated site water balance model incorporating surface and groundwater fluxes to or from all major project components, for all project phases. Include estimates of surface water runoff rates for major project components;	Present a **conceptual** integrated site water balance model incorporating surface and groundwater fluxes to or from all major project components, for all project phases~~. Include estimates of surface water runoff rates for major project components;~~	OPG is proposing modifications to provide clarity in how this requirement will be addressed in the Impact Statement commensurate with the early design stage of project planning. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the Impact Assessment process, or through another regulatory process. For example, while the conceptual integrated site water balance model would include conceptual level surface water runoff considerations and related mitigation measures, future approvals for detailed stormwater design would confirm specific flow rates per pathway and validation of assumptions. Follow-up monitoring, compliance monitoring, future ERAs, and Environmental management programs will be implemented to validate assumptions. Adaptative management measures will be developed where required.
120	5.7.2 – Groundwater and surface water	Indicate the groundwater and surface water withdrawal requirements during all phases and specify:	Indicate the **plans** for groundwater and surface water withdrawal requirements during all phases **and how the following specifications will be confirmed:**	OPG is proposing additional text to provide clarity in how this requirement will be addressed in the Impact Statement commensurate with the early design stage of project planning. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the Impact Assessment process, or through another regulatory process. Follow-up monitoring, compliance monitoring, future ERAs, and Environmental management programs will be implemented to validate assumptions. Adaptative management measures will be developed where required.
121	5.7.2 – Groundwater and surface water	Present key flow rates for all project components and water management structures, including inflow, outflow or surface run off from storage piles, dredge materials, and contaminated material storage;	~~Present key flow rates for all project components and water management structures, including inflow, outflow or surface run off from storage piles, dredge materials, and contaminated material storage;~~	OPG is proposing removal of this clause to provide clarity in how this requirement will be addressed in the Impact Statement commensurate with the early design stage of project planning. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be

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				met through the Impact Assessment process, or through another regulatory process. Comment line 119 indicates that a "conceptual integrated site water balance model incorporating surface and groundwater fluxes to or from all major project components, for all project phases" would be included. This conceptual model would reflect the applicable components of this clause.
122	5.7.2 – Groundwater and surface water	Present a comprehensive site water management plan for the project's lifecycle, including for: water inflows and outflows from project site; water diversion; process water management; stormwater management; and water management within the project site;	~~Present a comprehensive site water management plan for the project's lifecycle, including for:~~ ~~- water inflows and outflows from project site;~~ ~~- water diversion;~~ ~~- process water management;~~ ~~- stormwater management; and~~ ~~- water management within the project site;~~	OPG is proposing removal of this clause to provide clarity in how this requirement will be addressed in the Impact Statement commensurate with the early design stage of project planning. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the Impact Assessment process, or through another regulatory process. Comment line 119 indicates that a "conceptual integrated site water balance model incorporating surface and groundwater fluxes to or from all major project components, for all project phases" would be included. This conceptual model would reflect the applicable components of this clause.
123	5.7.2 – Groundwater and surface water	Demonstrate contaminant attenuation capacity empirically with field data and/or a numerical model (i.e., aquatic dispersion modelling). This model should also include a description of expected physical and geochemical reactions and transport mechanisms along flow paths (i.e., aqueous complexation, redox reactions, adsorption, ion exchange, colloidal transport, precipitation of solid phases, radioactive decay and ingrowth, advection, dispersion, diffusion) and how these were quantified or accounted for in the model;	**Where determined necessary to inform issues material to decision-making, present the timing and process that will be used** to demonstrate contaminant attenuation capacity empirically with field data and/or a numerical model (i.e., aquatic dispersion modelling). ~~This model should also include a description of expected physical and geochemical reactions and transport mechanisms along flow paths (i.e., aqueous complexation, redox reactions, adsorption, ion exchange, colloidal transport, precipitation of solid phases, radioactive decay and ingrowth, advection, dispersion, diffusion) and how these were quantified or accounted for in the model;~~	OPG is proposing additional text to reflect a risk-based approach to collecting data reflective of an assessment of potential interactions during the Impact Statement phase. Based on the findings of the assessment, predictions can be validated over a longer time period for those effects of concern identified during the Impact Assessment phase.
124	5.7.2 – Groundwater and surface water	Describe the downgradient flow of groundwater affected by the project, with the use of figures showing groundwater piezometric contours, drawdown contours and particle tracking results;	Describe the **predicted** downgradient flow of groundwater affected by the project, with the use of figures showing groundwater piezometric contours, drawdown contours **and if applicable,** particle tracking results;	OPG is proposing additional text to reflect a risk-based approach to collecting data reflective of an assessment of potential interactions during the Impact Statement phase. Based on the findings of the assessment, predictions can be validated over a longer time period for those effects of concern identified during the Impact Assessment phase.
125	5.7.2 – Groundwater and surface water	Describe the potential changes to surface water, groundwater, or sediment quality related to the project including:	Describe the potential changes to surface water **or** groundwater, ~~or sediment quality~~ related to the project including:	OPG is proposing that content related to sediment quality be removed from Section 5.7 (Groundwater and Surface Water) of the Draft TISG and included, as indicated above, in Section 5.3 (Topography, Soil and Sediment) for clarity.
126	5.7.2 – Groundwater and surface water	Changes to surface water, groundwater and sediment quality due to all discharges and effluents from the project, including changes to physicochemical parameters (temperature, pH, salinity, dissolved oxygen), and relevant chemical constituents	Changes to surface water **and** groundwater ~~and sediment quality~~ due to all discharges and effluents from the project, including changes to physicochemical parameters (temperature, pH, salinity, dissolved oxygen), and relevant chemical constituents (major and	OPG is proposing that content related to sediment quality be removed from Section 5.7 (Groundwater and Surface Water) of the Draft TISG and included, as indicated above, in Section 5.3 (Topography, Soil and Sediment) for clarity.

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		(major and minor ions, trace metals, radionuclides, nutrients, organic compounds); and	minor ions, trace metals, radionuclides, nutrients, organic compounds); and	
127	5.7.2 – Groundwater and surface water	Using the integrated chemical mass balance model, describe predicted worst, base and sensitivity case changes caused by project activities to surface water, groundwater and sediment quality in the receiving environment, for both physicochemical parameters and chemical constituents, including but not limited to: - Watercourse and waterbody crossings, blasting, diversions, dewatering, water withdrawal, wastewater return, overflows from excavation, and surface runoff volumes and quality;	~~Using the integrated chemical mass balance,~~ describe predicted ~~worst, base and sensitivity case~~ changes caused by project activities to ~~surface water, groundwater and sediment quality in~~ the receiving environment, for ~~both~~ physicochemical parameters and chemical constituent **using the integrated chemical mass balance model where appropriate**~~, including but not limited to:~~ ~~- Watercourse and waterbody crossings, blasting, diversions, dewatering, water withdrawal, wastewater return, overflows from excavation, and surface runoff volumes and quality;~~	OPG is proposing modifications to reflect that content related to sediment quality be removed from Section 5.7 (Groundwater and Surface Water) of the TISG and included, as indicated above, in Section 5.3 (Topography, Soil and Sediment) for clarity. Modifications are also recommended to reflect a risk-based approach to the assessment of potential interactions of a technology neutral project design during the Impact Statement phase. Specifically, that integrated chemical mass balance may be defined as an appropriate assessment tool based on the potential effect pathways. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the Impact Assessment process, or through another regulatory process.
128	5.7.2 – Groundwater and surface water	Compare the predicted worst, base and sensitivity case scenario changes to groundwater, surface and sediment quality to baseline and applicable guidelines, objectives or standards;	~~Compare the predicted worst, base and sensitivity case scenario changes to groundwater, surface and sediment quality to baseline and applicable guidelines, objectives or standards;~~	OPG is proposing modifications to reflect a risk-based approach to collecting data reflective of an assessment of potential interactions during the Impact Statement phase. Based on the findings of the assessment, predictions can be validated over a longer time period for those effects of concern identified during the Impact Assessment phase. Single scenario for assessment using PPE will be used for the purpose of the Impact Statement, with validation or sensitivity analysis if needed in subsequent project phases.
129	5.7.2 – Groundwater and surface water	Provide an assessment for off-site migration pathways for impacted groundwater, and an analysis of contaminant attenuation capacities within the hydrogeological units of the project study area;	~~Provide an assessment for~~ **Where determined necessary to inform issues material to decision-making, present the timing and process that will be used to assess** off-site migration pathways for impacted groundwater, and an analysis of contaminant attenuation capacities within the hydrogeological units of the project study area;	OPG is proposing modifications to reflect a risk-based approach to collecting data reflective of an assessment of potential interactions during the Impact Statement phase. Based on the findings of the assessment, predictions can be validated over a longer time period for those effects of concern identified during the Impact Assessment phase.
130	5.7.2 – Groundwater and surface water	Describe locations at which potential changes to water or sediment quality will be assessed, including:	Describe locations at which potential changes to water ~~or sediment~~ quality will be assessed, including:	OPG is proposing content related to sediment quality be removed from Section 5.7 (Groundwater and Surface Water) of the Draft TISG and included, as indicated above, in Section 5.3 (Topography, Soil and Sediment) for clarity.
131	5.7.2 – Groundwater and surface water	The proponent should refer to Health Canada's Guidance for Evaluating Human Health Impacts in Impact Assessments: Drinking and Recreational Water Quality [41] to ensure that it provides the information and analysis considered necessary to assess the project's effects on human health in relation to changes to water quality. The proponent should complete the checklist provided in this guide (Appendix A) to assist participants in verifying that the main elements of a water quality impact assessment have been completed and in identifying the location of this information in the Impact Statement. This checklist will facilitate the review of the Impact Statement and will be particularly useful if analyses on this aspect are found in several sections of the Impact Statement.	The proponent should refer to Health Canada's Guidance for Evaluating Human Health Impacts in Impact Assessments: Drinking and Recreational Water Quality [41] to ensure that it provides **explanation of where in the Impact Statement or through future programs** the information and analysis considered necessary to assess the project's effects on human health in relation to changes to water quality. The proponent should complete the checklist provided in this guide (Appendix A) to assist participants in verifying that the main elements of a water quality impact assessment have been completed and in identifying the location of this information in the Impact Statement. This checklist will facilitate the review of the Impact Statement and will be particularly useful if analyses on this aspect are found in several sections of the Impact Statement.	OPG is proposing additional text to provide clarity in how this requirement will be addressed in the Impact Statement commensurate with the early design stage of project planning. As outlined in Section 2.2 (IV), these changes are recommended to allow the Impact Statement to define how guideline requirements may be met through the Impact Assessment process, or through another regulatory process. Follow-up monitoring, compliance monitoring, future ERAs, and Environmental management programs will be implemented to validate assumptions. Adaptative management measures will be developed where required.

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132	5.8.1 – Baseline conditions	Quantify, describe and map wetlands (e.g. fens, swamps, marshes, peat lands, bogs), including ephemeral wetlands within the LSA and RSA potentially affected by the project, in the context of:	Quantify, describe and map wetlands (e.g. fens, swamps, marshes, peat lands, bogs), ~~including ephemeral wetlands~~ within the LSA and RSA potentially affected by the project, in the context of:	OPG is proposing removal of the requirement to describe and map ephemeral wetlands within the LSA and RSA. Potential pathways of effects to ephemeral wetlands outside of the NNW site are not anticipated given the general drainage patterns in the area from north to south, towards Lake Ontario. The site location on the Lake Ontario shoreline precludes the potential for downstream impacts to ephemeral wetlands. Additionally, there are limitations to the feasibility of the project to document ephemeral wetlands within the LSA or RSA scales as these features are often not tracked or described in public or provincial databases or discerned through air photo interpretation and would require landowner access at the LSA/RSA scales to document. Ephemeral wetlands have been mapped and documented for the NNW site and will be assessed for potential effects.
133	5.8.2 –Effects on terrestrial, riparian and wetland environments	Describe potential changes to terrestrial, riparian and wetland environments as a result of any new, known or suspected soil contamination within the study areas that could be re-suspended, released or otherwise disturbed as a result of the project;	Describe potential changes to terrestrial, riparian and wetland environments as a result of any new, known or suspected soil contamination within the study areas that could be ~~re-suspended~~, released or otherwise disturbed as a result of the project;	OPG is proposing removal of "re-suspension" from this requirement. The CSA N288.1:20 standard (Clause 7.2.4) (Canadian Standards Association (CSA), 2020) does not consider the re-suspension from soil to air pathway. It states that "Significant particulate re-suspension occurs only over large, open, bare, dry fields when the wind is strong. This is not the case at Canadian nuclear sites, where irrigated fields are small, sheltered, vegetated, and kept continually damp." As well, dose from inhaling re-suspended material is typically much lower than the dose from water ingestion. Additionally, as per CSA N288.6:22 Clause 7.3.4.2.5, inhalation dose for non-human biota is typically minor compared to soil and food ingestion. (Canadian Standards Association, 2022)
134	5.9.2 –Effects on terrestrial wildlife and their habitat	Describe and quantify, where possible, the potential effects to wildlife, including acute and chronic effects to wildlife health, of changes to air and water quality (e.g. from radiation exposure, contaminants, effluents, atmospheric emissions, dust deposition, and bioaccumulation);	Describe and quantify, where possible, the potential effects to wildlife, including ~~acute and~~ chronic effects to wildlife health, of changes to air and water quality (e.g. from radiation exposure, contaminants, effluents, atmospheric emissions, dust deposition, and bioaccumulation);	OPG is proposing removal of consideration of acute effects in this context. The wildlife dose benchmarks or toxicity reference values are typically chronic benchmarks and are appropriate for normal operations. Acute effects would be relevant to short-term high-exposure events, i.e. accidental releases, not normal operations.
135	5.10.2 –Effects on species at risk and their habitat	The Impact Statement must: • present the explicit calculation of radiation doses to species at risk assessed by COSEWIC with recognized approaches and software tools (example of acceptable approach in CSA N288.6-22 [8] clause 7.3.4 Dose calculation methods, and clause 7.3.7 Models);	The Impact Statement must: • present the explicit calculation of radiation doses to species at risk assessed by COSEWIC **(or using surrogate species)** with recognized approaches and software tools (example of acceptable approach in CSA N288.6-22 [8] clause 7.3.4 Dose calculation methods, and clause 7.3.7 Models);	OPG is proposing additional text to clarify that surrogate species may be used. While not all species at risk may be assessed quantitatively in the ERA, an appropriate surrogate receptor can be identified where species-specific data needed to calculate dose are limited. This approach is in accordance with CSA N288.6 (Canadian Standards Association, 2022).
136	5.10.2 –Effects on species at risk and their habitat	The proponent should consult with the Ontario Ministry of the Environment, Conservation, and Parks where an authorization under the Endangered Species Act [46] may be necessary and describe how and to what extent this process could address adverse effects.	The proponent should consult with the Ontario Ministry of the Environment, Conservation, and Parks where an authorization under the ~~Endangered Species Act [54]~~ **Species Conservation Act** may be necessary and describe how and to what extent this process could address adverse effects.	OPG is proposing modifications to reflect that the *Endangered Species Act* was repealed and the *Species Conservation Act* was brought into force on March 30, 2026
137	5.11.1 – Baseline conditions for fish and fish habitat	Underwater soundscape and vibration, including those offshore, based on acoustic measurements, including vibration and sound sources, geographic extent, as well as spatial and temporal variations within the water column and at the lakebed,	~~Underwater soundscape and vibration, including those offshore, based on acoustic measurements, including vibration and sound sources, geographic extent, as well as spatial and temporal variations within the water column and at the lakebed,~~	OPG is proposing removal of this requirement. Given the absence of any notable noise and vibration sources, underwater measurements should be excluded from the baseline data collection program and instead be addressed in the effects assessment using conservative assumptions of imperceptible or near-zero ambient conditions.
138	5.11.2 – Effects to fish and fish habitat	Changes to surface water and groundwater quality resulting from acid rock drainage and/or metal(loid) leaching from mined, excavated or blasted material, including:	Changes to surface water and groundwater quality resulting from acid rock drainage and/or metal (loid) leaching from ~~mined,~~ excavated or blasted material, including:	OPG is proposing removal of text to remove discussion of mined material, which is not applicable to this project.

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139	5.11.2 – Effects to fish and fish habitat	Use a three-dimensional numerical groundwater flow model to simulate the hydrogeological system and estimate key water fluxes based on the calibrated baseline conditions model and include: • major project components, including open pits, underground workings, waste rock piles, tailings management facilities, dewatering wells, water diversion ditches, and sediment ponds,	Use a three-dimensional numerical groundwater flow model to simulate the hydrogeological system and estimate key water fluxes based on the calibrated baseline conditions model and include: • major project components, including ~~open pits,~~ underground workings, ~~waste rock piles,~~ ~~tailings management facilities~~, dewatering wells, water diversion ditches, and sediment ponds,	OPG is proposing removal of text related to mining projects, which is not applicable to this project.
140	5.11.2 – Effects to fish and fish habitat	A consideration of all relevant material, including historical waste, such as waste rock, ore (including off-site), low grade ore, pit wall materials, underground development ramps, process waste (i.e. tailings, heap leach, treatment sludge, coarse coal rejects, processed kimberlite) overburden and potential construction material (i.e. mine rock, quarries, unconsolidated material), and	A consideration of all relevant material, including historical waste~~, such as waste rock, ore (including off-site), low grade ore, pit wall materials, underground development ramps, process waste (i.e. tailings, heap leach, treatment sludge, coarse coal rejects, processed kimberlite)~~ overburden and potential construction material ~~(i.e. mine rock, quarries, unconsolidated material), and~~	OPG is proposing removal of text related to mining projects, which is not applicable to this project.
141	5.11.2 – Effects to fish and fish habitat	A geochemical characterization study describing the spatial and compositional representativeness of samples, the analytical methods used to evaluate geochemical properties (including mineralogy, metal(loid) leaching, and acid generation potential), and the approach used to predict drainage chemistry trends over time, as well as how uncertainties will be addressed as the project advances. Consider relevant guidance, such as Mine Environment Neutral Drainage (MEND) report 1.20.1, International Network for Acid Prevention's GARD Guide, ECCC's Environmental Code of Practice for Metal Mines, and applicable provincial or territorial guidance. The study must include a Conceptual Geochemical Model that assesses how project activities and components may affect the quality of surface water, groundwater, and sediment in areas that support fish habitat. This model must include risk-based source terms, integrate geochemical data from relevant materials to predict drainage chemistry and quantify the potential for metal(loid) leaching and acid rock drainage under expected site conditions, especially from sulphidic geological materials,]	~~A geochemical characterization study describing the spatial and compositional representativeness of samples, the analytical methods used to evaluate geochemical properties (including mineralogy, metal(loid) leaching, and acid generation potential), and the approach used to predict drainage chemistry trends over time, as well as how uncertainties will be addressed as the project advances. Consider relevant guidance, such as Mine Environment Neutral Drainage (MEND) report 1.20.1, International Network for Acid Prevention's GARD Guide, ECCC's Environmental Code of Practice for Metal Mines, and applicable provincial or territorial guidance. The study must include a Conceptual Geochemical Model that assesses how project activities and components may affect the quality of surface water, groundwater, and sediment in areas that support fish habitat. This model must include risk-based source terms, integrate geochemical data from relevant materials to predict drainage chemistry and quantify the potential for metal(loid) leaching and acid rock drainage under expected site conditions, especially from sulphidic geological materials,]~~	OPG is proposing to remove this requirement related to mining projects, which is not applicable to this project.
142	5.12.1 –Baseline conditions	Maps of nests that will be or have been added to the Abandoned Nest Registry and are being monitored to comply with the Migratory Birds Regulations, 2022 [48]; and	~~Maps of nests that will be or have been added to the Abandoned Nest Registry and are being monitored to comply with the Migratory Birds Regulations, 2022 [48]; and~~	OPG is proposing to remove this from the TISG, as OPG must comply with the Migratory Bird Regulation (MBR) throughout the life of the NNW Project regardless of inclusion of this requirement in the TISG. Abandoned nest registration typically would not be undertaken at this stage of a project given uncertainties with precise project footprints and risk that new nesting areas could be established and abandoned in the intervening years between Impact Assessment related studies and start of site preparation. Consideration for which, if any, abandoned nests will be registered will be completed subsequent to the development of the IS at a time when project footprints are sufficiently advanced to focus any necessary registrations within the confirmed areas of disturbance.
143	6.0 - Health, social, and economic conditions	The IAA requires the consideration of changes to health, social or economic conditions and the positive and negative consequences of these changes that are likely to be caused	Title change: ~~Health, social and economic conditions~~ **Human Environment**	OPG is proposing that the header titles are consistent with category names in VC table for enhanced readability and tracking of those VCs.

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		by the carrying out of the designated project. The IAA also requires the assessment of adverse effects within federal jurisdiction, including non-negligible adverse changes occurring in Canada to the health, social or economic conditions of Indigenous Peoples.		
144	6.0 - Health, social, and economic conditions	The proponent should work with, at minimum, the Town of Cobourg, Municipality of Port Hope, Municipality of Trent Hills, Municipality of Brighton, Township of Hamilton, Township of Alnwick/Haldimand, Township of Cramahe and other self-identifying local communities, as well as local peoples, when fulfilling the requirements of Section 6. The proponent must consider the First Nations and other Indigenous communities outlined in 3.1 of the IEPP when fulfilling the requirements in Section 6 and Section 7.3.2.	The proponent should **consider impacts on** ~~work with,~~ at minimum, **Northumberland County, Regional Municipality of Durham, City of Kawartha Lakes and Peterborough County / City of Peterborough at a regional level; and, the Municipality of Port Hope, Town of Cobourg, Hamilton Township and the Municipality of Clarington at a local level** ~~the Town of Cobourg, Municipality of Port Hope, Municipality of Trent Hills, Municipality of Brighton, Township of Hamilton, Township of Alnwick/Haldimand, Township of Cramahe~~ and other self-identifying local communities, as well as local peoples, when fulfilling the requirements of Section 6. The proponent must consider the First Nations and other Indigenous communities outlined in 3.1 of the IEPP when fulfilling the requirements in Section 6 and Section 7.3.2.	OPG is proposing modifications to better encompass townships, municipalities, and communities located in the vicinity of Wesleyville.
145	6.1.1 - General baseline conditions	Provide a comparison of data at the provincial, regional or national level, if possible, to better interpret baseline conditions;	Provide ~~a comparison of~~ data at the **local, regional,** provincial, ~~regional~~ or national level, **where relevant and available** ~~if possible~~, to better interpret baseline conditions;	OPG is proposing modifications to clarify that data will be provided in accordance with the defined Local Study Area (LSA) and Regional Study Area (RSA). Providing local, regional, provincial or national level data is useful to place LSA and RSA data into a broader context. However, in some cases provincial or national data that is comparable to LSA or RSA data may not exist. In other cases only provincial and national level data may exist so comparisons are not possible.
146	6.2.1 - Baseline for Health Conditions	Describe the current cancer occurrence among local peoples in the region, including cancer rate, type, mix, stage of cancer, age of detection/diagnosis, and lifespan of cancer patient. Include provincial and national information on cancer occurrence, among Indigenous Peoples and local peoples, to put regional information into perspective.	**Using available data,** describe the current cancer occurrence among local peoples in the region, including cancer rate, type, mix, stage of cancer, age of detection/diagnosis, and lifespan of cancer patient. Include provincial and national information on cancer occurrence, among Indigenous Peoples and local peoples, to put regional information into perspective.	OPG requests to enhance clarification that the data presented will leverage credible available data sources as available.
147	6.2.2 - Effects on health conditions	Problem formulation and screening decisions for the HHRA should be informed by engagement with First Nations and other Indigenous communities and consider Indigenous-specific exposure pathways, including harvesting practices, consumption of country foods, use of surface and groundwater, seasonal and mobile use patterns, and intergenerational considerations.	Problem formulation ~~and screening decisions~~ for the HHRA should be informed by engagement with First Nations and other Indigenous communities and consider Indigenous-specific exposure pathways, including harvesting practices, consumption of country foods, use of surface and groundwater, seasonal and mobile use patterns, and intergenerational considerations.	OPG is proposing removal of "screening decisions" for the Human Health Risk Assessment (HHRA). As per CSA N288.6, the Problem Formulation for the HHRA includes selection of contaminants, receptors and exposure pathways, as well as comparison of screening levels to screening criteria (Canadian Standards Association, 2022). Therefore, the problem formulation would be sufficient to adequately assess Indigenous-specific exposure pathways through engagement with Rights-holding First Nations and interested Indigenous communities.
148	6.2.2.1 - Effects on biophysical determinants of health	Describe how the project-related contaminants (as identified in sections 5.3 Topography, soil and sediment, 5.6 Atmospheric, acoustic and visual environment, and 5.7 Groundwater and surface water) can potentially end up in the water, air or soil, can be absorbed in country foods (i.e., foods that are trapped, fished, hunted, harvested or grown for subsistence, cultural or medicinal purposes);	Describe how the **applicable** project-related contaminants (as identified in sections 5.3 Topography, soil and sediment, 5.6 Atmospheric, acoustic and visual environment, and 5.7 Groundwater and surface water) can potentially end up in the water, air or soil, can be absorbed in country foods (i.e., foods that are trapped, fished, hunted, harvested or grown for subsistence, cultural or medicinal purposes);	OPG is proposing additional text to specify project-related contaminants based on applicability, as not every contaminant identified in the other sections is necessarily applicable to the HHRA. The list may be refined further based on comparison against relevant screening criteria and applicable exposure pathways.

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149	6.2.2.1 - Effects on biophysical determinants of health	First Nations and other Indigenous communities who have historically used, or identify potential or future use and reconnection priorities within the area of potential effects. This includes Indigenous Peoples who practice traditional ways of life in proximity to the project through any direct or indirect pathways (i.e., hunting, trapping, fishing, harvesting, etc.). This may be reflected in a HHRA.	**Rights-holding** First Nations and other Indigenous communities who have historically used, or identify potential or future use and reconnection priorities within the area of potential effects. This includes Indigenous Peoples who practice traditional ways of life in proximity to the project through any direct or indirect pathways (i.e., hunting, trapping, fishing, harvesting, etc.). This may be reflected in a HHRA.	OPG is proposing additional text to clarify that the focus of the effects assessment for biophysical determinants of health is on Rights-holding First Nations and other Indigenous communities. Note that it may not be possible to separately assess all Rights-holding First Nations and interested Indigenous communities who have historically used, or identify potential or future use and reconnection priorities within the area of potential effects, and representative receptors may be used in this case.
150	6.2.2.1 - Effects on biophysical determinants of health	Address the effects of using radiation weighting factors suggested in CSA N288.6, for calculating a "biota effective dose" from absorbed dose (i.e., weighting factors of 40 for alpha particles, and 3 for tritium beta particles); and,	Address the effects of using radiation weighting factors suggested in CSA N288.6, **applicable for human dose** ~~for calculating a "biota effective dose" from absorbed dose (i.e., weighting factors of 40 for alpha particles, and 3 for tritium beta particles); and,~~	OPG is proposing modifications to remove discussion of biota dose from this section. This text is referring to biota dose; however, the TISG section is on human health.
151	6.2.2.1 - Effects on biophysical determinants of health	Use a probabilistic modelling approach if there is ambiguity in the validity of dose estimates for site-specific conditions and/or VCs (i.e., a probabilistic approach is appropriate when it is necessary to grossly extrapolate information for other areas or species, or when there is ambiguity in the protection of any threatened or endangered species, or species of concern;	Use a probabilistic modelling approach if **the results of the probabilistic modelling are likely to provide a better basis for risk management and decision-making than a deterministic risk assessment. An example of where probabilistic modelling may be considered is if** there is ambiguity in the validity of dose estimates for site-specific conditions and/or VCs ~~(i.e., a probabilistic approach is appropriate when it is necessary to grossly extrapolate information for other areas or species, or when there is ambiguity in the protection of any threatened or endangered species, or species of concern);~~	OPG is proposing additional conditional wording for probabilistic modelling, dependent on validity of dose estimate for site-specific conditions. CSA N288.6 does not require a probabilistic risk assessment (Canadian Standards Association, 2022). It uses "may" language meaning it is an option to use. There may be limited value to conducting a probabilistic assessment, and as such the language could be revised to enable more flexibility based on information available.
152	6.2.2.1 - Effects on biophysical determinants of health	Provide an assessment of the carcinogenicity of diesel exhaust when diesel engines are a source of air pollutant emissions for the project.	Provide an assessment of the carcinogenicity of diesel exhaust **(with PM2.5 as a surrogate for diesel particulate) when** diesel engines are a source of air pollutant emissions for the project.	OPG is proposing additional text to align with comment #84 on diesel particulate matter.
153	6.2.2.1 - Effects on biophysical determinants of health	Evaluate the potential risk to human and non-human biota from biocides and other means used to manage biohazards and invasive species; and	~~Evaluate the potential risk to human and non-human biota from biocides and other means used to manage biohazards and invasive species; and~~	OPG is proposing removing this clause entirely, as it is not deemed relevant to this section on risk assessment. This statement is a requirement under REGDOC-1.1.1 (Canadian Nuclear Safety Commission, 2025) related to the assessment of biological hazards on the safe operation of the facility. It will be included as part of the assessment of external hazards, and not as part of the assessment of effects of the project on biophysical determinants of health.
154	6.2.2.1 - Effects on biophysical determinants of health	Provide an assessment of the carcinogenicity of diesel exhaust when diesel engines are a source of air pollutant emissions for the project.	**Using available data sources,** provide an assessment of the carcinogenicity of diesel exhaust **(with PM2.5 as a surrogate for diesel particulate)** when diesel engines are a source of air pollutant emissions for the project.	OPG is proposing additional text to align with comment #84 on diesel particulate matter.
155	6.2.2.2 - Effects on social determinants of health	Describe potential effects of project conditions (e.g., transient employment, high wages, high stress work, coupled with gender-based norms) on community safety, including increased risks of harm from family conflict, sexual exploitation, and gender- and family-based violence, particularly during the construction phase;	Describe potential effects of project conditions (e.g., transient employment, high wages, high stress work, coupled with gender-based norms) **on personal and** community safety **(e.g.,** ~~including~~ increased risks of harm from family conflict, sexual exploitation, and gender- and family-based violence), particularly during the construction phase;	OPG is proposing modifications to add the consideration of personal safety. People's sense of personal safety is a measure of community safety and an indicator of overall community well-being.

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156	6.3.1 - Baseline for social conditions	A brief history of human occupancy and of land resource use in the study area based on selected spatial and temporal boundaries (include maps, if possible), including information on major industries and initiatives in the vicinity of the project site, including the Port Hope Area Initiative;	A brief history of human occupancy **(where information is available)** and of land resource use in the study area based on selected spatial and temporal boundaries (include maps, if possible), including information on major industries and initiatives in the vicinity of the project site, including the Port Hope Area Initiative;	OPG is proposing additional text to specify that this would be included where information is available. Specific to land and resource use scope, details regarding human occupancy may be limited within planning policy documents themselves.
157	6.3.1 - Baseline for social conditions	Describe baseline conditions for community well-being and way of life, including:	Describe baseline conditions for **those social and economic conditions that contribute** to community well-being and way of life, including	OPG is proposing additional text on social and economic conditions contributing to community well-being and way of life. This is important, because "community well-being" is an outcome of impacts on a variety of social and economic conditions.
158	6.3.1 - Baseline for social conditions	Relevant protection factors that contribute to community well-being and resilience, including any interactions between these factors (e.g., sense of belonging, cultural continuity, language, family supports);	Relevant protection factors that contribute to community well-being ~~**and resilience**~~, including any interactions between these factors (e.g., sense of belonging, cultural continuity, language, family supports);	OPG is proposing removal of "resilience" from this requirement. Although distinct, the concepts of "community well-being" and "community resilience" are closely interconnected. The social and economic assessment for the NNW Project is aimed at protecting or enhancing community well-being. Improved community well-being can support resilience (i.e., healthier, more connected, economically secure communities generally cope better with crises). As such, the use of the terms "community well-being" and "resilience" together is considered redundant.
159	6.3.1 - Baseline for social conditions	Describe and evaluate the local, regional, First Nation and other Indigenous community, and local community infrastructure and services in the study areas. Evaluations should consider the existing capacity, functionality, and ability of infrastructure and services to meaningfully meet the needs of local peoples:	Describe and evaluate the local, regional, First Nation and other Indigenous community, and local community infrastructure and services in the study areas. **If possible,** evaluations should consider the existing capacity, functionality, and ability of infrastructure and services to meaningfully meet the needs of local peoples:	OPG is proposing adding the caveat "If possible" or "Where data is available" because in some cases data may not be available.
160	6.3.1 - Baseline for social conditions	Capacity of municipal governments and First Nations and other Indigenous communities to collaborate with provincial and federal authorities and to secure funding and support required to upgrade the current regional infrastructure and services; and	~~Capacity of municipal governments and First Nations and other Indigenous communities to collaborate with provincial and federal authorities and to secure funding and support required to upgrade the current regional infrastructure and services; and~~	OPG is proposing removal of this requirement to describe the capacity of municipal governments and Rights-holding First Nations and interested Indigenous communities to collaborate with the Provincial and Federal government to secure funding support as this is outside the scope of a Project's assessment of impacts.
161	6.3.2.1 - Effects on community well-being and way of life	Document and take into account tolerance thresholds for potential adverse effects identified by First Nations and other Indigenous communities and local communities;	~~Document and take into account tolerance thresholds for potential adverse effects identified by First Nations and other Indigenous communities and local communities;~~	OPG is proposing removal of 'tolerance thresholds' as it may be interpreted as requiring participants to articulate quantitative thresholds or limits of acceptability. Perspectives and concerns are often context dependent and may not be appropriately or consistently expressed as a tolerance level.
162	6.3.2.1 - Effects on community well-being and way of life	Describe potential adverse and positive effects, at the community level, of changes to community well-being including, but not limited to:	Describe potential adverse and positive effects, at the community level, of changes to **social and economic conditions** ~~community well-being~~ including, but not limited to:	OPG is proposing modifications to better align with proposed revisions to VCs.
163	6.3.2.1 - Effects on community well-being and way of life	The Impact Statement must: - describe the local and regional economic conditions for First Nations and other Indigenous communities and local communities, including: - ... - local peoples and communities, and First Nations and other Indigenous communities interested in local land uses and resources for previous projects in the regional study area; and	The Impact Statement must: - describe the local and regional economic conditions for First Nations and other Indigenous communities and local communities. - ... - ~~Local peoples and communities, and First Nations and other Indigenous communities interested in local land uses and resources for previous projects in the regional study area; and~~	OPG is proposing removal of the requirement where it is unclear what the intent of this clause represents in describing the baseline local and regional economic conditions.

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164	6.3.2.2 – Effects on services and infrastructure	Describe the adverse and positive effects to the local and regional services and infrastructure, including their capacity and functionality, anticipating and considering increased demand on these services including those identified under section:	Describe the adverse and positive effects to local and regional services and infrastructure, including their capacity and functionality, anticipating and considering increased demand on these services **within defined study areas and using publicly available information and information from engagement**, including those identified under section:	OPG is proposing additional text as this adds clarity that the assessment is bounded by the defined study area and available engagement information.
165	6.3.2.2 – Effects on services and infrastructure	Assess potential effects on First Nations and other Indigenous communities' infrastructure, programs, and service delivery capacity, including governance and delivery of community services. This includes identifying any project-driven demands on services (e.g., health, emergency response, housing, community infrastructure, social services, and administrative capacity), estimating incremental costs and resourcing needs, and describing mitigation measures and proposed commitments to avoid, reduce, or address these effects.	Assess potential effects on First Nations and other Indigenous communities' infrastructure, programs, and service delivery capacity, including governance and delivery of community services. This includes identifying any project-driven demands on services (e.g., health, emergency response, housing, community infrastructure, social services, and administrative capacity), **based on information shared through engagement and publicly available sources, where applicable;** estimating incremental costs and resourcing needs, **where information is provided by the Rights-holding First Nations and interested Indigenous communities and permitted for inclusion** and describing mitigation measures and proposed commitments to avoid, reduce, or address these effects.	OPG is proposing additional text as the additions aligned with Section 2.2 (II), reflecting that satisfying this obligation is dependent on information sharing and OPG be permitted to use such information
166	6.3.2.2 - Effects on services and infrastructure	Assess potential effects on First Nations and other Indigenous communities' infrastructure, programs, and service delivery capacity, including governance and delivery of community services. This includes identifying any project-driven demands on services (e.g., health, emergency response, housing, community infrastructure, social services, and administrative capacity), estimating incremental costs and resourcing needs, and describing mitigation measures and proposed commitments to avoid, reduce, or address these effects.	Assess potential effects on First Nations and other Indigenous communities' infrastructure, programs, and service delivery capacity, including governance and delivery of community services. This includes identifying any project-driven demands on services (e.g., health, emergency response, housing, community infrastructure, social services, and administrative capacity), ~~estimating incremental costs and resourcing needs,~~ and describing mitigation measures and proposed commitments to avoid, reduce, or address these effects.	OPG is proposing removal of text as OPG will rely on information provided by Rights-holding First Nations and interested Indigenous Communities to identify potential effects on communities' services and infrastructure. As part of continued engagement, OPG can support in identifying need for expenditures; however, OPG is not well positioned to provide incremental cost information for First Nation led services and infrastructure.
167	6.4.1 - Baseline for economic conditions	Existing employment rates and economic well-being in the study area and impacted communities;	Existing employment rates ~~and economic well-being~~ in the study area and impacted communities;	OPG is proposing the removal of the term "economic well-being" in this instance. Employment is a contributor to overall "community well-being" of which "economic well-being" is a component. The use of both terms is redundant.
168	6.4.2 - Effects on economic conditions	An estimate of total investment requirements;	~~An estimate of total investment requirements;~~	OPG is proposing removal of this requirement. The term "total investment requirements" is proprietary and subject to wide interpretation.
169	6.4.2 - Effects on economic conditions	A detailed forecast of project revenues, capital and operating costs, including applying sensitivity analyses based on qualitative (e.g., cost overruns, anticipated electricity rates, etc.) and quantitative (e.g., discounted cash-flow analysis or levelized cost of electricity, etc.) factors; and	~~A detailed forecast of project revenues, capital and operating costs, including applying sensitivity analyses based on qualitative (e.g., cost overruns, anticipated electricity rates, etc.) and quantitative (e.g., discounted cash-flow analysis or levelized cost of electricity, etc.) factors; and~~ **Provide an economic effects assessment, supported by economic modelling, that will describe the local, regional, and national economic effects based on reasonable assumptions for the potential future project.**	OPG is proposing removal of these factors pertaining to Project economics and its viability, as they are deemed to be duplicative with the decision-making process of electricity generation projects which fall under jurisdiction of the Province. Additionally, given the PPE approach being applied for the NNW Project, there may be significant variation in capital costs, electricity costs, revenue, and other measures associated with sensitivity analysis which may be speculative at this stage, and thus unable to provide meaningful and reliable assessment under the TISG.

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				Lastly, Section 6.4.2.2 indicates that economic information provided will be made public and should not include confidential business information. However, OPG's position is that providing project-specific economic/viability information will not be fully available nor suitable for public disclosure at this stage, and any future project economics developed for procurement and commercial decision-making is expected largely to remain commercially confidential. OPG appreciates IAAC's intention to ensure economic considerations are addressed as part of the Impact Assessment and acknowledges that understanding potential economic effects is important to inform public and Indigenous engagement, characterize potential effects across communities, and support identification of practical mitigation and benefit-enhancement measures, should they be required. As such, OPG has proposed to refine the scope of the assessment to focus on inputs for the purposes of economic modelling, providing an economic effects assessment describing local, regional, provincial, and national economic effects based on reasonable assumptions for a potential future project.
170	6.4.2.1 - Effects on employment	Anticipated workplace policies and programs, including hiring policies and programs, employee assistance programs and benefits programs;	**If possible,** anticipated workplace policies and programs, including hiring policies and programs, employee assistance programs and benefits programs;	OPG is proposing the addition of "if possible" to this requirement. Describing existing working policies that OPG follows is possible, but it is not appropriate to speculate on anticipated or future policies. Anticipated or future policies are developed in response to federal and provincial legislation and OPG's relationships with internal stakeholders such as unions. A project-specific impact assessment cannot speculate on these matters.
171	6.5 – Mitigation and enhancement measures for health, social and economic conditions	The Impact Statement must: describe the proposed mitigation and enhancement measures for effects on human health, including: how radiation protection measures maintain doses to the public and the environment to a level that is As Low As Reasonably Achievable (ALARA) through the application of Best Available Technology and Techniques Economically Achievable (BATEA);	The Impact Statement must: describe the proposed mitigation and enhancement measures for effects on human health, including: how radiation protection measures **reduce** ~~maintain~~ doses to the public and the environment ~~to a level that is As Low As Reasonably Achievable (ALARA) through the application of Best Available Technology and Techniques Economically Achievable (BATEA);~~	OPG is proposing to remove the discussion of ALARA through the application of BATEA at this phase of the project. This is intended to align with the plant parameter envelope approach for the IS and LTPS. During this phase, OPG will credibly demonstrate that the reactor technologies under consideration meet the dose acceptance criteria and safety goals defined in REGDOC-2.5.2, Design of Reactor Facilities: Nuclear Power Plants (Canadian Nuclear Safety Commission, 2023). Predicted effective and equivalent doses to workers and members of the public will be analyzed for the PPE, encompassing the different reactor technologies, under the environmental risk assessment and accidents and malfunctions effects assessment. OPG believes this proposed wording aligns with the wording and intent of REGDOC-1.1.1, Appendix G.7.2 (Canadian Nuclear Safety Commission, 2025). Meeting ALARA principles will be addressed in later phases of the project's licensing lifecycle, in accordance with the regulatory requirements set out in REGDOC-2.5.2, *Design of Reactor Facilities: Nuclear Power Plants.*
172	6.5 – Mitigation and enhancement measures for health, social and economic conditions	Identification of mitigation and prevention measures to eliminate or minimize the radiological hazards through design and engineering controls;	~~Identification of~~ **Describe various potential** mitigation and prevention measures to eliminate or minimize the radiological hazards **to workers** through design and engineering controls;	OPG is proposing to describe various potential design and engineering controls for radiological hazards to workers. Engineered controls to radiological hazards are reactor technology specific, therefore, they cannot be fully identified under the plant parameter envelope approach, nor, with the level of project-design detail available. The clarification "to workers" is added to better align with the source requirements in REGDOC 1.1.1 (Canadian Nuclear Safety

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				Commission, 2025). Finally, nuclear power plants have many systems, structures, components, and administrative controls for mitigation of radiological hazards. In light of the technology neutral approach taken for the Impact Assessment/LTPS, it is not feasible to identify or describe them all considering the multiple reactors being analyzed in the impact assessment phase. Therefore, only the key controls will be described in the Impact Statement.
173	6.5 – Mitigation and enhancement measures for health, social and economic conditions	Effects on infrastructure and services; • where applicable, provide documented confirmation from the grid owner(s) that, with appropriate grid and plant mitigation measures in place, the location of the reactor facility will not adversely affect the grid	Effects on infrastructure and services; • ~~where applicable, provide documented confirmation from the grid owner(s) that, with appropriate grid and plant mitigation measures in place, the location of the reactor facility will not adversely affect the grid~~	OPG is proposing removal of the sub-bullet on grid owner(s) listed under the effects on infrastructure and services bullet. Grid owner and plant mitigation measures do not appear consistent with requirements of this section, which focuses on enhancement measures for health, social and economic conditions. Note, this requirement will be addressed in the LTPS as it is included in REGDOC-1.1.1 Section 3.6.6, (Canadian Nuclear Safety Commission, 2025) "Where applicable, the applicant shall confirm with the grid owner(s) that, with appropriate grid and plant mitigation measures in place, the location of the reactor facility will not adversely affect the grid. The applicant shall document this confirmation and provide it in the application".
174	7.0 - First Nations and other Indigenous communities	The Impact Statement must demonstrate how impacts on Indigenous Peoples and their rights were considered and assessed, including:	The Impact Statement must demonstrate how impacts on Indigenous Peoples and their rights were considered and assessed **or how First Nations and other Indigenous communities' assessment information or outcomes may be brought forward into the Impact Assessment and decision making phases of the impact assessment,** including:	OPG is proposing additional text to offer flexibility on where Rights-holding First Nations and other Indigenous communities' assessment outcomes may align in the Impact Assessment process.
175	7.0 - First Nations and other Indigenous communities	Where requested by First Nations and other Indigenous communities, parts or all of the assessments of effects on Indigenous Peoples and their rights can be combined in the group-specific assessment. For example, effects on the current use of lands, water and Relatives, and resources for traditional purposes and impacts on Indigenous rights to hunt, fish, and trap can be reported together. First Nations and other Indigenous communities may also identify holistic VCs that encompass multiple environmental, health, social, or economic elements. Undertaking these assessments together, when requested, will support consistent conclusions. In all cases, the Impact Statement must demonstrate that all requirements were met.	Where requested by First Nations and other Indigenous communities, parts or all of the assessments of effects on Indigenous Peoples and their rights can be combined in the group-specific assessment. For example, effects on the current use of lands, water and **species** ~~Relatives~~, and resources for traditional purposes and impacts on Indigenous rights to hunt, fish, and trap can be reported together. First Nations and other Indigenous communities may also identify holistic VCs that encompass multiple environmental, health, social, or economic elements. Undertaking these assessments together, when requested, will support consistent conclusions. In all cases, the Impact Statement must demonstrate how all requirements were **or will** be met **through the Impact Assessment process.**	OPG is proposing additional text to offer flexibility on where Rights-holding First Nations and other Indigenous communities' assessment outcomes may align in the Impact Assessment process based on the content in the clauses that follow related to the MS-WTFN led-assessment. OPG is proposing removal of the term "Relatives". As indicated in Section 2.2 (III) of this document, it is OPG's understanding that OPG's use of chosen terms such as 'Relatives' is not appropriate; OPG recognizes that such characterization would need to be assessed by Rights-holding First Nations and interested Indigenous communities who may choose not to share information for use in the Impact Statement.
176	7.0 - First Nations and other Indigenous communities	The Impact Statement must contain an assessment for each First Nation and other Indigenous community potentially affected by the project, and summarize any past, present and anticipated future use of, and practices within, the study areas.	The Impact Statement must contain an assessment **or must demonstrate how all requirements will be met through the Impact Assessment process** for each First Nation and other Indigenous community potentially affected by the project, and summarize any past, present and anticipated future use of, and practices within, the study areas.	OPG is proposing additional text to offer flexibility on where First Nations and other Indigenous communities' assessment outcomes may align in the Impact Assessment process.
177	7.0 - First Nations and other Indigenous communities	The Proponent must work with the First Nations and other Indigenous communities identified in sections 3.1 and 3.2 of the IEPP in the development of the Impact Statement. As	Here and in other requirements where the Proponent is required to work with the First Nations and other Indigenous communities, add: **"Where the First Nations and other Indigenous**	As indicated in Section 2.2 (II), OPG is proposing additional text to include consideration that Rights-holding First Nations and other

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		described in the IEPP, the degree of engagement with each community will be contextualized based on the 3.1 and the 3.2 distinction, as well as information provided by each First Nation or Indigenous community regarding potential pathways of impact from the project on their Indigenous or Treaty rights and interests.	**communities have limited or no participation in the project, provide an explanation."**	Indigenous communities may have limited capacity or interest in participation in the NNW Project or the related Impact Assessment.
178	7.0 - First Nations and other Indigenous Communities	Protocols and participation in any assessment of physical and cultural heritage, that are being carried out or led by the proponent, including but not limited to archaeological investigations, must be developed in collaboration with First Nations and other Indigenous communities and must abide by provincial standards and standards set by applicable First Nations and other Indigenous communities.	~~Protocols and participation in~~ any assessment of physical and cultural heritage, that are being carried out or led by the proponent, including but not limited to archaeological investigations, ~~must be developed in collaboration with First Nations and other Indigenous communities and must abide by~~ will **follow Ministry of Citizenship and Multiculturalism (MCM) provincial standards guidelines and standards including engagement with** ~~set by applicable~~ First Nations and other Indigenous communities.	OPG is proposing modifications to this text to clarify that cultural heritage and archaeology will follow provincial standards and guidelines including engagement with Rights-holding First Nations and interested Indigenous communities. As indicated in Section 2.2 (II) of this document, OPG is proposing additional text to reflect that in some cases Rights-holding First Nations and interested Indigenous communities may choose not to share information for use in the Impact Statement or to support cultural heritage and archaeological assessments.
179	7.0 - First Nations and other Indigenous Communities 7.1.2 Effects to physical and cultural heritage and structures, sites or objects of significance	The Impact Statement must assess effects to physical and cultural heritage, and structures, sites or objects things of historical, archaeological, paleontological or architectural significance based on a comparison with and without the project, including:	The Impact Statement must assess effects to physical and cultural heritage, and structures, sites or objects things of historical, archaeological, paleontological or architectural significance ~~based on a comparison with and without the project~~, including:	As indicated in Section 2.2 (V), during the development of the Impact Statement, OPG would assess and provide a "without the project" discussions where it is practicable, evidence-based, and materially contributes to understanding mitigation measures, extent to which likely adverse federal effects are significant, and follow-up requirements.
180	7.2.2 - Effects to current use of lands, waters and Relatives for traditional purposes	The Impact Statement must: assess the effects on current use of lands, waters and Relatives for traditional purposes, based on likely effect pathways and a comparison with and without the project, including changes to:	The Impact Statement must: assess the effects on current use of lands, waters and **species** ~~Relatives~~ for traditional purposes, based on likely effect pathways ~~and a comparison with and without the project~~, including changes to:	OPG is proposing removal of the term "Relatives". As indicated in Section 2.2 (III) of this document, it is OPG's understanding that the use of chosen terms such as 'Relatives' is not appropriate; OPG recognizes that such characterization would need to be assessed by Rights-holding First Nations and interested Indigenous communities who may choose not to share information for use in the Impact Statement. OPG is also proposing the removal of "comparison with and without the project" as indicated in Section 2.2 (V), during the development of the Impact Statement, OPG would assess and provide a "without the project" discussions where it is practicable, evidence-based, and materially contributes to understanding mitigation measures, extent to which likely adverse federal effects are significant, and follow-up requirements.
181	8.0 - Security Considerations	The Impact Statement must provide a commitment that the SSTRA and basis information will be maintained as security baseline characterization data for the lifecycle of the facility.	~~The Impact Statement must provide a commitment that the SSTRA and basis information will be maintained as security baseline characterization data for the lifecycle of the facility.~~	OPG is proposing the removal of this text because the SSTRA and basis information being maintained as security baseline characterization data for lifecycle of the facility is a direct requirement from Appendix D of REGDOC-1.1.1 (Canadian Nuclear Safety Commission, 2025) and therefore should not need a commitment statement from OPG to be made in the IS.
182	8.1.1 - Remote Areas	The proponent must evaluate remote sites with respect to the anticipated time required to implement essential response services, including how long it will take offsite armed responders to reach the reactor facility. This aspect of the SSTRA should support early identification of the need	~~The proponent must evaluate remote sites with respect to the anticipated time required to implement essential response services, including how long it will take offsite armed responders to reach the reactor facility. This aspect of the SSTRA should support early identification of the need for establishing an onsite~~	OPG is proposing to remove this section on remote sites which does not apply to the Wesleyville site. NNW is near Port Hope and Cobourg which are within approximately 24 km and have police, fire, and hospital services. No nuclear armed response requirements are expected during site preparation as nuclear fuel will not be on site.

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		for establishing an onsite nuclear response force capability, to ensure that a trained response group is in position during the construction phase of possible target sets (such as vital areas) that are part of the reactor facility.	~~nuclear response force capability, to ensure that a trained response group is in position during the construction phase of possible target sets (such as vital areas) that are part of the reactor facility.~~	
183	8.2 - Transportation Routes	The Impact Statement proponent must consider the transportation routes in close proximity of the site, to ensure that they are adequately taken into account during future site development activities. IAAC proposes to assess the potential adverse effects of project-related transportation on applicable valued components within a defined geographic scope. This scope will be established at the end of the Planning Phase when these Guidelines are finalized and will focus on transportation activities in close proximity to the project site. The routes to be considered include waterways, land routes and airspace, as described in the following text. For each of the routes in close proximity of the site and associated security measures, as outlined below, the proponent must also consider and describe First Nations and other Indigenous communities' use, harvesting areas and cultural landscapes, and assess potential effects on navigation, access, mobility, and the exercise of rights.	The Impact Statement proponent must consider the transportation routes in close proximity of the site, to ensure that they are adequately taken into account during future site development activities. ~~IAAC proposes to assess the potential adverse effects of project-related transportation on applicable valued components within a defined geographic scope. This scope will be established at the end of the Planning Phase when these~~ Guidelines ~~are finalized and~~ will focus on transportation activities in close proximity to the project site. The routes to be considered include waterways, land routes and airspace~~, as described in the following text. For each of the routes in close proximity of the site and associated security measures, as outlined below, the proponent must also consider and describe First Nations and other Indigenous communities' use, harvesting areas and cultural landscapes, and assess potential effects on navigation, access, mobility, and the exercise of rights.~~	OPG is proposing removal of text to align with the REGDOC-1.1.1 (Canadian Nuclear Safety Commission, 2025) requirements (Section 3.7) and notes that this Section of the draft TISG relates to security considerations. The text proposed to be removed relates to assessing effects of project related transportation, which is outside of the scope of the security assessment. It is noted that effects of the project on transportation are considered under Section 6.3.2.2 Effects on services and infrastructure.
184	9.1 - Risk Assessment	Engage with First Nations and other Indigenous communities to understand community-identified risks and thresholds for unacceptable harm and describe how these perspectives informed the assessment	Engage with First Nations and other Indigenous communities, **as described in Section 3,** to understand community-identified risks and thresholds for unacceptable harm and describe how these perspectives informed the assessment;	OPG is proposing additional text to avoid duplication on information that may be provided in Section 3 whilst ensuring clear traceability between engagement activities and their application in the accident and malfunction risk assessment.
185	9.2 – Emergency Management	Identify emergency planning zones and emergency response for accident and malfunction scenarios, taking into account population density, the transient workforce, seasonal population fluctuations, and population projections for the life cycle of the project;	~~Identify emergency planning zones and emergency response for accident and malfunction scenarios, taking into account population density, the transient workforce, seasonal population fluctuations, and population projections for the life cycle of the project;~~ **The proponent is required to provide certain information about the emergency planning zones. For more information, see Sections 3.3.5 and 4.6.1 of REGDOC-1.1.1.**	To enhance clarity and to reflect the proponent's role, OPG is proposing to adopt Section 4.6.1 of REGDOC-1.1.1, which outlines requirements and guidance for proponent/applicant information and roles in Emergency Planning Zones (EPZs). EPZs are determined and implemented by the Province of Ontario through Emergency Management Ontario (EMO) via a Site Implementing Plan and are not decided by OPG. Additionally, these zones are technology dependent and determined based on Nuclear Safety Analysis (Probabilistic Safety Assessment (PSA)/Deterministic Safety Assessment (DSA)/Offsite Dose Consequence) and it would not be possible to identify the zones at or prior to the LTPS stage. OPG will continue to work with EMO to provide the required information to support determination and implementation of the EPZs for NNW throughout the licensing stages.
186	9.2 – Emergency Management	Take into account evacuation areas in the planning of emergency measures as well as the particularities linked to these areas (e.g., population density, number of residents varying with the seasons, possible high number of individuals unfamiliar with the region, limited communication means in remote areas and with temporary residents);	~~Take into account evacuation areas in the planning of emergency measures as well as the particularities linked to these areas (e.g., population density, number of residents varying with the seasons, possible high number of individuals unfamiliar with the region, limited communication means in remote areas and with temporary residents);~~	OPG is proposing the removal of this text as this is effectively the same as the text about EPZs (see comment #185). One of the EPZs (automatic action zone) is provincially designated as a zone where urgent protective actions such as evacuation must occur. However, the size of this zone cannot be determined at this stage of the project.

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187	9.2 – Emergency Management	Describe any plans for delivering training and exercise programs in local Indigenous languages for potentially affected First Nations and other Indigenous communities.	~~Describe any plans for delivering training and exercise programs in local Indigenous languages for potentially affected First Nations and other Indigenous communities.~~	OPG is proposing the removal of this text as OPG does not deliver emergency response training directly to any offsite organization. When requested, OPG provides inputs and expertise to training efforts led by those offsite agencies. OPG's exercise programs involve stakeholders with a direct Provincial Nuclear Emergency Response Plan (PNERP) accountability related to public protection. Additional participation and/or observation of exercises for non-PNERP stakeholders are offered by OPG in English. It is not practical for OPG to offer any exercises or training materials in other languages beyond English. There are no regulatory requirements within Canada to provide exercises and training material in other languages.
188	9.2 – Emergency Management	Consider the locations of First Nations and other Indigenous communities, seasonal access conditions, transportation routes, and community-identified safety priorities in emergency planning and evacuation modelling. Describe how engagement with First Nations and other Indigenous communities informed modelling assumptions and response measures, including evacuation, sheltering, and KI-pill distribution strategies.	~~Consider the locations of First Nations and other Indigenous communities, seasonal access conditions, transportation routes, and community-identified safety priorities in emergency planning and evacuation modelling. Describe how engagement with First Nations and other Indigenous communities informed modelling assumptions and response measures, including evacuation, sheltering, and KI-pill distribution strategies.~~	OPG is proposing the removal of this text as evacuation planning and modelling beyond the site boundary is not within the authority or responsibility of OPG. The utility does not have the jurisdiction to authorize the movement of people in the public or within First Nations or other Indigenous communities and cannot provide instructions to members of the public nor First Nations and Indigenous communities on evacuation or sheltering. KI Pill distribution is accounted for within the EPZs where the utility must comply with required KI pill distribution based on the size of the implemented EPZ.
189	9.2 – Emergency Management	Engage with affected First Nations and other Indigenous communities and consider their governance structures, community locations, seasonal access realities, and safety priorities. The Impact Statement must describe how Indigenous input informed evacuation modelling, sheltering strategies, communication approaches, and recovery planning;	~~Engage with affected First Nations and other Indigenous communities and consider their governance structures, community locations, seasonal access realities, and safety priorities. The Impact Statement must describe how Indigenous input informed evacuation modelling, sheltering strategies, communication approaches, and recovery planning;~~	OPG is proposing the removal of this text as the utility does not have the jurisdiction to authorize the movement of people in the public and cannot provide instructions to members of the public nor First Nations and Indigenous communities on evacuation or sheltering. OPG's Impact Statement will describe plans and activities within the site boundary. The utility is required through REGDOCs and PNERP to work with federal and provincial agencies to ensure they are provided the appropriate information to make informed decisions on these items.
190	9.2 – Emergency Management	Consider culturally safe and trauma-informed approaches, including culturally appropriate communication and support measures developed in collaboration with First Nations and other Indigenous communities;	~~Consider culturally safe and trauma-informed approaches, including culturally appropriate communication and support measures developed in collaboration with First Nations and other Indigenous communities;~~	OPG is proposing the removal of this text as communications related to emergency management would not be distributed by OPG (it is not within OPG's jurisdiction). OPG's broader communications in relation to the Impact Assessment for the NNW Project with Rights-holding First Nations and interested Indigenous communities is captured in Sections 3 and 7 of the Draft TISG.
191	9.2 – Emergency Management	Develop monitoring and follow-up programs for accidents and malfunctions in collaboration with First Nations and other Indigenous communities and include relevant Indigenous-led or co-developed components. The Impact Statement must	~~Develop monitoring and follow-up programs for accidents and malfunctions in collaboration with First Nations and other Indigenous communities and include relevant Indigenous-led or co-developed components. The Impact Statement must describe how~~	OPG is proposing removal of this text as monitoring and follow-up programs beyond the site-boundary are not within OPG's jurisdiction. OPG does not have the authority to perform any activities offsite

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		describe how Indigenous input informed recovery objectives, monitoring indicators, and considerations related to the resumption of access to lands and waters;	~~Indigenous input informed recovery objectives, monitoring indicators, and considerations related to the resumption of access to lands and waters;~~	related to public safety, unless directed or authorized by provincial authorities. Typically, these types of programs require collaboration between EMO and OPG, and would likely result in agreements being set in place prior to any operational activities which may lead to the use of monitoring or follow-up programs. Further to this point, REGDOC 2.10.1, Emergency Preparedness and Response contains the following section: "2.2.4 Interface and support for offsite response organizations All licensees shall: In accordance with ER plans and procedures: 1. establish plans and procedures to coordinate response activities with appropriate offsite organizations, in the event of an emergency with offsite implications 2. formally document any arrangements or agreements with other organizations or personnel 3. ensure that agreed-upon resources, and the quantity of these resources required to respond to offsite conditions, are available when needed 4. cooperate with and assist offsite organizations with their response activities to address offsite impacts; provide expertise and resources (personnel, emergency response equipment, and material) in support of offsite authorities during an emergency; and define the quantity of available resources within their ER plan
192	9.2 – Emergency Management	Consider, where identified by First Nations and other Indigenous communities, any specific conditions under which lands or waters would be considered safe for renewed use in the development of recovery measures and follow-up programs;	~~Consider, where identified by First Nations and other Indigenous communities, any specific conditions under which lands or waters would be considered safe for renewed use in the development of recovery measures and follow-up programs;"~~	OPG is proposing removal of this text as monitoring, recovery and follow-up programs beyond the site boundary are not within the jurisdiction of OPG.
193	9.2 – Emergency Management	• describe emergency communication plans that would provide emergency instructions to surrounding communities, including First Nations and other Indigenous communities, and how these will be informed by the public and First Nations and other Indigenous communities. The proponent should consider the following: • immediate urgent actions, such as notifying the public of security and safety concerns, instructions for on-site shelter or shelter-in-place, procedures and evacuation routes; • longer-term actions, such as a general website and telephone helplines, updates on the status of incidents, injured animal reports;	~~• describe emergency communication plans that would provide emergency instructions to surrounding communities, including First Nations and other Indigenous communities, and how these will be informed by the public and First Nations and other Indigenous communities. The proponent should consider the following:~~ ~~• immediate urgent actions, such as notifying the public of security and safety concerns, instructions for on-site shelter or shelter-in-place, procedures and evacuation routes;~~ ~~• longer-term actions, such as a general website and telephone helplines, updates on the status of incidents, injured animal reports;~~ ~~• the contact information for entities (municipal/provincial/federal/other) involved in ongoing long-~~	OPG is proposing removal of this text as OPG does not have the authority or jurisdiction to provide public safety communication or instructions beyond the site boundary as they relate to emergencies. The utility has a responsibility through regulatory and provincial requirements to inform offsite agencies within specific timelines of accidents and potential releases offsite, however it is not within OPG's authority to inform members of the public about urgent protective actions and safety concerns, instructions for sheltering, or evacuation.

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		• the contact information for entities (municipal/provincial/federal/other) involved in ongoing long-term monitoring of air quality, water quality, and/or country (traditional) foods (such as fish) and details about such monitoring; • translation to local Indigenous languages; and • the Interim Service Standards for Culturally-Relevant Emergency Management Services of Indigenous Services Canada's Emergency Management Assistance Program [62];	~~term monitoring of air quality, water quality, and/or country (traditional) foods (such as fish) and details about such monitoring;~~ • ~~translation to local Indigenous languages; and~~ • ~~the Interim Service Standards for Culturally-Relevant Emergency Management Services of Indigenous Services Canada's Emergency Management Assistance Program [62];~~	As communication during an emergency is vitally important, it is imperative communication be coordinated and channeled through a central dissemination process, which is typically EMO as per PNERP.
194	9.2 – Emergency Management	Describe liaison, training and continuous education plans linked to emergency preparedness for surrounding communities that may be affected by the consequences of a significant incident, including for First Nations and other Indigenous communities;	Describe ~~liaison, training and continuous education plans~~ **the public awareness plans** linked to emergency preparedness for surrounding communities that may be affected by the consequences of a significant incident, including for First Nations and other Indigenous communities;	OPG is proposing revision of this text as OPG does not directly deliver any training or continuous education to the public or external organizations.
195	9.2 – Emergency Management	Describe measures to ensure engagement is carried out with First Nations and other Indigenous communities to meet requirements as co-determined with respective First Nations and other Indigenous communities;	~~Describe measures to ensure engagement is carried out with First Nations and other Indigenous communities to meet requirements as co-determined with respective First Nations and other Indigenous communities;~~	As indicated in Section 2.1 of this document, OPG is committed to engagement with Rightsholders and interested Indigenous communities in the development of the Impact Statement, including information related to emergency management.
196	9.2 – Emergency Management	Describe past, ongoing and planned outreach efforts to ensure the public and First Nations and other Indigenous communities understanding of the risks associated with this type of project (e.g., providing non-technical information, providing information in local languages if requested); and	Describe past, ongoing and planned outreach efforts to ensure the public and First Nations and other Indigenous communities understanding of the risks associated with this type of project ~~(e.g., providing non-technical information, providing information in local languages if requested)~~; and	OPG is proposing the removal of text related to translation requirements as it is not be feasible to provide translation of information in other languages. Preliminary risks associated with the NNW Project will be identified during the Impact Assessment process as part of Section 9 of the Draft TISG "Effects of Potential Accidents or Malfunctions". As part of the Impact Statement submission, OPG will be required to provide a plain-language summary of the Impact Statement.
197	9.2 – Emergency Management	Describe any waste management plan as it pertains to waste generated during an emergency response.	~~Describe any waste management plan as it pertains to waste generated during an emergency response.~~	OPG is proposing the removal of this text as the management of recovery operations is centralized at the provincial level. It is expected OPG will assist in any recovery and remediation efforts as directed by EMO per the PNERP.
198	10.1.2 - Climate change commitments	The proponent is encouraged to keep apprised of updates to the SACC and related technical guides published by ECCC.	~~The proponent is encouraged to keep apprised of updates to the SACC and related technical guides published by ECCC.~~	OPG requests that the current version of the Strategic Assessment of Climate Change (SACC), including relevant technical guidance, to be cited in the Integrated TISG.
199	10.2.1 - Extent to which the likely effects of the project contribute to sustainability	Identify the four to six key VCs from section 1.3 Selection of Valued Components relevant to long-term well-being to be included in the sustainability analysis, informed by Indigenous Knowledge and the project context	Identify the four to six key VCs from section 1.3 Selection of Valued Components relevant to long-term well-being to be included in the sustainability analysis, informed by Indigenous Knowledge, **as available to the proponent for inclusion in the Impact Statement,** and the project context	OPG is proposing additional text to reflect that the information may not be available. to OPG or permitted to be used for the Impact Statement.

3.2. Comments on Draft Plans

Preamble:

OPG has reviewed the draft Indigenous Engagement and Partnership Plan, Public Participation Plan, Permitting Plan, and Cooperation Plan. OPG recognizes that the Indigenous Engagement and Partnership Plan and the Public Participation Plan focus on the IAAC and CNSC's planned consultation approach throughout the assessment process, while the Permitting Plan and Cooperation Plan continue to be refined through ongoing discussions with relevant regulatory departments. OPG has the following comments at this time on the Permitting and Cooperation Plans:

Table 2: OPG comments on the Draft Plans

Document Name	Section # of the Draft Plan	Reference text from the Draft Plans	OPG Comments on the Draft Plans
Cooperation Plan	Appendix 2 Table A2 Ontario Ministry Regulatory Mechanism References	Authorization under the Endangered Species Act or the future Species Conservation Act	OPG anticipates that this text will be updated to reflect that the Species Conservation Act is now in force.
Permitting Plan	Section 3.1 Licence under Section 24 of the Nuclear Safety and Control Act	(a) that activity is located within the licensed boundaries of an existing Class IA nuclear facility and the new reactors have a combined thermal capacity of more than 900 MWth;	The applicable trigger for the NNW Project is subsection 27(b) of the Physical Activities Regulations under the IAA. Subsection 27(b) states: (b) that activity is not located within the licensed boundaries of an existing Class IA nuclear facility and the new reactors have a combined thermal capacity of more than 200 MWth.

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