Designating the NWMO's DGR project as a Project of National Interest and adding it to Schedule 1 under the Building Canada Act

Submitted October 23, 2026

The Citizens' Network on Waste Management (CNWM) and the Great Lakes Ecoregion Network (GLEN) are alarmed at the Federal Government's proposal to designate NWMO's DGR as a Project of National Interest (PONI) under Schedule 1 under the Building Canada Act.

The CNWM is a network of citizens' groups throughout Ontario working on waste issues since 1981. One of our main focuses has been on NWMO's development of its proposal for disposing of high-level used nuclear fuel bundles.

Formed in 2022, GLEN is a network of seasoned leaders with experience in transboundary collaboration and Great Lakes policy. Its work has included coordinating work to have radionuclides be designated as Chemicals of Mutual Concern under the Great Lakes Water Quality Agreement.

Many concerned people have dedicated considerable time – some for decades – educating ourselves on the proposal and making input into how to find better solutions to the problem of used nuclear fuel bundles.

Now the Government proposes to short-circuit the process we have been involved in, ignoring and tossing away the expectation that we had that there would be a thorough environmental assessment and thorough public hearings in the NWMO process. The only environmentally related reference to protection of the environment that the Government makes in its Gazette Notice is the last criterion: "contribute to clean growth and to meeting Canada's objectives with respect to climate change." This is an incredibly weak criterion.

Canada, the U.S., and other government agencies throughout the world have stated that high level nuclear fuel wastes must be separated from the environment for hundreds of thousands of years, or variations on that such as a million years, or "forever". Given the devastating hazards associated with these wastes, and their very long lives, and that no equivalent facility has been built or operated in the world, we must not risk building a facility that has not been thoroughly assessed. Therefore, we oppose designating NWMO's proposal for a quick decision-making process under the PONI system.

The NWMO proposal is still at a conceptual stage with many unanswered questions. Therefore, the NWMO project should not be put through the quick, limited PONI process.

The Gazette Notice's NWMO project proposal description is very limited in its description. For example, it includes only the impacts of transportation on the actual DGR site. This

means that the potential hazards of transportation of used fuel bundles to the site is ignored. The NWMO project "involves 2-3 shipments per day for more than 50 years, with each truck hauling 35 tonnes of radioactive waste per trip. Over 90% of the shipments will come from Southern Ontario, averaging 1,700 km per trip, with most of those kilometres travelled on the poorly maintained and mostly 2-lane roads of northeastern and northwestern Ontario." [Backgrounder: Nuclear Waste Transportation, Northwatch, https://beyondnuclear.org/wp-content/uploads/2025/09/Backgrounder_NuclearWasteTransportation_September2025.pdf. This is a major omission from the project scope.

Therefore, we urge the Government not to designate the NWMO project as a PONI.

We urge you to post this and other comments on the proposed NWMO designation on your public site. We give you our permission to post our submission.

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