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**Sent:** June 7, 2013 4:21 PM  
**To:** McGee, Kelly; Myles, Debra [CEAA]  
**Cc:** DGR Review / Examen DFGP [CEAA]  
**Subject:** 'Comment Disposition Table - Draft EIS Guidelines - OPG's proposed DGR project'

Ms. McGee / Ms. Myles,

Please accept the submission of the attached 'Comment Disposition Table - Draft EIS Guidelines - OPG's proposed DGR project'. This table was originally prepared by CNSC staff after the comment period in the spring of 2008. It was recently brought to the attention of CNSC staff that this table had not been posted on the registry.

Thank you,

Kiza

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**<EMAIL HAS BEEN APPROVED FOR RELEASE>**

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**Public Comments on the DRAFT Environmental Impact Statement Guidelines for Ontario Power Generation's proposed Deep Geologic Repository for Low- and Intermediate-Level Waste**

**Comment period April 8 to June 18, 2008**

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<a href="#">59</a>	Yens Pedersen		It does not appear to me that the Environmental Impact Statement (EIS) guidelines require the proponent to describe monitoring activities which would monitor any of the negative impacts outlined in the EIS. The type, location, frequency and duration of monitoring are significant and should be described in the EIS.	No change. The EIS Guidelines describe the monitoring activities in sufficient detail.
			<p>With respect to the accident and malfunction section of the EIS, the Guidelines do not provide sufficient guidance to the proponent. The EIS Guidelines should for instance direct the proponent to consider and address the following scenarios:</p> <ul style="list-style-type: none"> <li>▪ accidents or malfunctions during the transportation of waste to the site</li> <li>▪ the probability of natural events or 'acts of God' such as floods and earthquakes</li> <li>▪ the possibility of acts of military aggression, for example: what the effect of a bombing attack on the surface would be, and any vulnerability of the barriers and effects as a result.</li> </ul>	No change. The EIS Guidelines provide detailed guidance on accidents and malfunctions.
<a href="#">75</a>	National Council of Women of Canada (NCWC) — Karen Dempsey (submitted twice)		<p>NCWC, which has long standing policies opposing the burial of nuclear waste due to the dangers posed to public health, safety and the environment and the need to protect the Great Lakes, shares the grave concerns of many environmental groups and the public regarding OPG's proposal for the burial of low and medium nuclear non-fuel waste on the shores of Lake Huron, and has communicated our thoughts on this important matter to both the Canadian Nuclear Safety Commission (CNSC) and the Minister of Environment on earlier occasions.</p> <p>Lake Huron is not only one of our treasured Great Lakes, but it provides fresh water,</p>	Comments do not request changes to the EIS Guidelines.

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			<p>recreational opportunities, habitat for a large diversity of eco systems and species, and living space for millions of people on both sides of the US/Canadian border, which are all at risk should containment of the proposed repository fail, due to human error, systems failure, geologic conditions, or other catastrophic events.</p> <p>These unacceptable risks will not be confined to the life of the waste site, but will last for many thousands of years, as some of the radioactive elements in the buried nuclear waste are extremely long lasting, e.g., Plutonium 239 which is present in both low and intermediate nuclear waste has a half-life of 24,300 years, i.e., it will remain a hazard for close to half a million years.</p> <p>Given the potential for an environmental, health and social catastrophe at one end of the probability spectrum, and the likely chances for such problems as ongoing nuclear releases into the lake, soil, and ground water at site, as well as transportation accidents along the nuclear waste haulage routes through many communities at the other, NCWC finds it alarming that this first-of-a-kind proposal to bury nuclear radioactive waste is being subjected to such a radically truncated process. Explicitly, unlike the Nuclear Waste Management Organizations extremely lengthy ongoing process lasting to date over 20 years, this deep geologic repository is being moved along far too speedily by CNSC, to the very probable detriment of long-term environmental and public protection.</p> <p>This is being done, moreover, in the absence of federal legislation specific to these kinds of nuclear waste and CNSC regulatory standards or guidelines, and with the intent as per the draft Joint Panel Agreement, of having CNSC appoint two members and give final approval to the suggested appointee of the Minister of Environment.</p>	
			<p>NCWC particularly objects to the lack of a completely independent Panel for such a significant and risky project. As noted in our January 22, 2007, letter to the Minister of Environment the Honourable John Baird, "there are many well qualified and unbiased experts in scientific fields such as biology, geology and hydrology from whose numbers you could provide a truly independent EA Review Panel for this extremely important</p>	<p>The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission.</p>

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			<p>and precedent setting hearing".</p> <p>NCWC stands by this opinion and requests that the Joint Panel Agreement be amended to give the final choice of panel members to the Minister of Environment whose mandate it is to protect the health and well-being of Canadians.</p>	
			<p>As well, since the project may move ahead without a thoroughly independent panel as suggested by many, NCWC supports the general comments and in-depth critique of the Draft EIS Guidelines submitted by the Provincial Council of Women of Ontario (PCWO). Most specifically, we note PCWO's requests for an enlarged geographic area to be considered as being at risk from accidents or nuclear releases, the use of extremely long timelines and contingency plans to cover the many thousands of years of containment for radionuclides, the use of independent expert witnesses by the Panel and precautionary, burden-of-proof evidence, and very importantly, extensive public participation at any EA hearing.</p>	<p>The spatial boundaries can be adapted to encompass the Great Lakes if it is determined that there is an environmental effect. Contingency plans are discussed in the EIS Guidelines and public participation is a requirement of the <i>Canadian Environmental Assessment Act</i> and the <i>Nuclear Safety and Control Act</i>.</p>
34	Dave Bennis		<p>With 1/7 of the US Population and 1/4 of the Canadian population living near the Great Lakes it is imperative that due diligence be observed with regard to the evaluation of the environmental impact of the Bruce Nuclear Repository. It is therefore suggested that the project immediately review these issues:</p> <ol style="list-style-type: none"> <li data-bbox="948 1062 2093 1224">1. The impacted area of this unprecedented proposed deep geological repository should be expanded to include Michigan and all communities in the Great Lakes Basin.</li> <li data-bbox="948 1224 2093 1424">2. The Environmental Impact Panel should be made up of members entirely independent of the nuclear establishment in Canada and should not include members of the Canadian Nuclear Safety Commission.</li> </ol>	<p>No change. The spatial boundaries can be adapted to encompass the Great Lakes if it is determined that there is an environmental effect.</p> <p>The Panel will comprise independent member and not current members of the Canadian Nuclear Safety Commission. The members of the Joint Review Panel will be appointed</p>

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				by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission.
			3. The comment period should be extended by at least 90 Days to properly inform communities affected by the proposed repository of its possible grave effects on the Great lakes forever.	Comment noted.
			Furthermore, the Canadian Environmental Assessment Agency should hold informational meetings in Michigan.	The document was revised to reflect this comment. The <i>Canadian Environmental Assessment Act</i> does not exclude public outside of Canada. The EIS guidelines require that the proponent describe public participation opportunities for non-Canadian.
<a href="#">156</a> & <a href="#">138</a>	Robert Bernecky		<p>I have just received notice that Ontario Power Generation (OPG) wishes to construct a nuclear waste dump on the edge of Lake Huron. OPG claims, if I read the report properly, that they do not intend to dump nuclear fuel there, but that they DO intend to dump other radioactive materials, including reactor components, and, presumably, contaminated liquids used in the reactor maintenance, etc.</p> <p>It strikes me as the height of folly and arrogance to position any sort of dump right at the edge of the largest source of fresh water in the world - any HONEST environmental impact assessment will immediately forbid any such construction, on the grounds that a leak, however "unlikely" it may be, will cause serious contamination of the fresh water supplies for the millions of people who are unfortunate enough to live down-stream from Lake Huron. That includes the Toronto water supply, in case their geography isn't very strong.</p>	Comments do not request changes to the EIS Guidelines.

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			<p>OPG has an extremely poor track record on the public safety front regarding nuclear reactors: they have also played fairly loose with the truth regarding heavy water leaks and other reactor problems. Furthermore, the OPG safety record is no better; this is from the Sierra Club:</p> <p>The Sierra Club of Canada has identified 20 major safety-related incidents and unresolved safety concerns. Since Bruce Power leased the Bruce stations in the second quarter of 2001, there have been 218 reportable events at the Bruce A nuclear station, despite the fact that there were no reactors operating. During roughly the same period there have been 397 reportable events at Bruce B. Reportable events are the more serious safety-related events at nuclear plants. The CNSC and Bruce Power have refused to provide the Sierra Club with six important safety-related documents".</p> <p>If this project goes ahead, it should do so ONLY with the stipulation that OPG will be held DIRECTLY responsible for ALL costs related to ANY leaks or other problems that affect the public. If this stipulation is made, the project will be stillborn, because there is no way that OPG will ever expose itself to the billions of dollars in potential damages that would result from a spill or other disaster at the site (especially when they can sucker-punch the public into taking on that burden, as they have done with the shutdown costs and disaster risks of the Ontario nuclear plants, while passing on the profits from those plants to their buddies, such as British Nuclear Fuels).</p>	
<a href="#">36</a>	Philip Terrie		<p>I am writing to express my concern about the deep geological repository proposed for Kinkardine, Ontario.</p> <p>With 1/7 of the United States population and 1/4 of the Canadian population living near the Great Lakes, it is imperative that due diligence be observed with respect to the evaluation of the environmental impact of the Bruce Nuclear Repository.</p> <p>Four issues seem especially important:</p> <ol style="list-style-type: none"> <li>1. The study area for this deep geological repository should be expanded to include</li> </ol>	See response to comment #3.

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			<p>Michigan and all communities in the Great Lakes Basin.</p> <ol style="list-style-type: none"> <li>2. The Environmental Impact Panel should be made up of members entirely independent of the nuclear establishment in Canada and should not include members of the Canadian Nuclear Safety Commission.</li> <li>3. The comment period should be extended by at least 90 days to properly inform all communities affected by the proposed repository of its likely serious impact.</li> <li>4. The Canadian Environmental Assessment Agency should hold informational meetings in Michigan and other impacted parts of the United States, in addition to meetings in Canada.</li> </ol>	
<p><a href="#">118</a> &amp; <a href="#">40</a></p>	<p>Phil Bladen (submitted twice)</p>		<p>I am absolutely opposed to the proposed deep underground dump at the Bruce site. It is incredible to me that any agency would even consider such a plan at close proximity to the Great Lakes, putting at severe risk the whole watershed, and the drinking water of millions of people on both sides of the International Border. It is not a question of if there will be radiation leakage, but how soon that contamination will occur. This project should never have been proposed, so absolute is its lack of intelligence and responsibility. To give it even the semblance of credibility by holding hearings to discuss it only compounds the irrationality, particularly in the involvement of the Canadian Nuclear Safety Commission.</p> <p>Since the CNSC is, by mandate, an arbiter, independent of government, to guard the public against unsafe nuclear procedures, it should have no involvement whatever in these hearings. That it is so involved makes the word safety an anomaly, and brings into question its role as an independent final judge. In law, I have yet to hear of a judge appointed to hear an appeal of his own lower court decision. The CNSC should therefore assert its independence, and reclude itself from these hearings, or forever lose all credibility in the eyes of the Canadian public.</p>	<p>Comments did not request changes to the EIS Guidelines.</p>
<p><a href="#">116</a></p>	<p>Citizens for Alternatives</p>		<p>Suggests that the Review Panel must be impartial and neutral and should not be</p>	<p>The Joint Review Panel will be an</p>

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	to Chemical Contamination (CACC) & The Great Lakes Environmental Law Centre (GLELC) (Kay Cumbow)		appointed by the CNSC	independent panel appointed by the Minister of Environment and the President of the Canadian Nuclear Safety Commission.
			The proposal to construct and maintain a DGR for low and intermediate waste deep below the shores of Lake Huron contravenes the principles of numerous treaties between Canada and the United States	No change was made to the document. The EIS Guidelines requires that the proponent summarize and discuss applicable international agreements. Further, specific attention must be made to bi-national treaties and agreements.
			High-level waste must not be allowed at the DGR and must require a full EA. OPG must explain why NWMO is planning to be involved in the DGR if not for the very reason of storing high level nuclear waste in the facility if it is built.	No change. The scope of the project is only for low- and intermediate-level waste.
		1.2	The EIS must be more thorough. Proposed changes include:  Although each phase of the DGR project may require a separate permit, all phases of the project are integrally tied together. The DGR project should not be recommended for approval unless the panel is sure that from inception to decommissioning there will be no threat of environmental contamination.	No change. The environmental assessment process assesses all phases of the proposed project to ensure that there is no threat to the environment and the health and safety of people and animals.
		2.5	OPG must ensure that the precautionary approach is infused into each step and that scientific studies are conducted by independent consulting companies to ensure the data and predictive models are correct.	The EIS Guidelines require that the proponent demonstrate how it applied the precautionary principle.
		4.1	The scope of the project should also include the transportation of the low-level and intermediate waste materials to the site. All potential adverse impacts from travel	No change made to the document. Transportation of low and

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			between initial loading and unloading should be considered.	intermediate level waste is not within the scope of the DGR project as waste is and would continue to be at the Western Waste Management Facility at the Bruce Power Site.
		5.4	OPG should identify all listed species which reside within the boundaries of Bruce and the Greater Lake Huron area and the effect of irradiated contamination on those populations.	No change. The EIS Guidelines state that all species within the site study area, the local study area and the regional study area must be described.
		5.5	OPG must look at its own private and Canada's public obligation to ensure that the quality of water and air of the Great Lakes are maintained.	No change. The EIS Guidelines require the proponent to assess the effects of the project on the quality of water and air including effects to the Great Lakes.
		7.2	Alternatives to this project must be thoroughly examined. OPG must compare its plans for continued monitoring and maintenance of the DGR to other possible waste disposal alternatives. OPG must have a sufficient plan to deal with all possible future events.	No change. The EIS Guidelines do require that alternatives to the project be examined.
		8	The descriptions of the waste characteristics which OPG must supply should be as specific as possible and include the potential of bioaccumulation and biomagnifications of each isotope as well.	The document was revised to reflect this comment. The required information for the description of waste characteristics has been expanded to include the non-fissile nature of the material including the half-life of each isotope, and how the properties chemical and radiological hazards will change with time

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		8	Although OPG currently claims that high level waste and irradiated fuel cells will not be buried at the DGR, decommissioning waste from the twenty Ontario reactors should be accounted for.	The EIS Guidelines require the proponent to provide a description of the type of waste to be included in the DGR.
		8.2	OPG should not only describe the proposed mode and route of transport and the volumes and quantities to be transported, but also the possible affected populations and the potential impacts at each phase of the transportation.	No change. Transport of waste is not within the scope of the DGR project, see response above regarding waste.
		8.4	The decommissioning plan should include an overview of permanent monitoring methodology. The long term plan must discuss methods for monitoring, retrieving and repackaging materials in the event of container leaks, groundwater seepage or serious accident. In addition, it should contain information on OPG’s liability if they transfer management of the DGR to another company or subsidiary, sell the DGR to another company or subsidiary, or abandon the site altogether.	The proponent must address the requirements for a preliminary decommissioning plan as outlined in CNSC Regulatory Guide G-219 <i>Decommissioning Planning for Licensed Activities</i> .
		9.1	The regional study area must be expanded to include all communities in the Great Lakes Basin which border Lake Huron. Lake Michigan should be considered as well since both bodies exchange water. The EIS must take both the United States and Canada into account since leakage or serious accident could result both in widespread aquatic contamination and in an extensive dispersion of airborne radioactive pollution.	No change. Spatial boundaries can be adapted to encompass Great Lakes if it is determined that there are environmental effects
		9.2	Temporal boundaries should be set at longer time horizons not just the “period of time during which the maximum impact is predicted to occur.” Proposed EIS at 22. The boundaries should extend more than a million years into the future because some radionuclides with half-life over a million years are targeted for burial in this dump.	No change was made to the document. The EIS Guidelines require that the proponent consider the hazardous lifetime of the contaminant associated with the project.
		9.3	OPG should identify which communities depend on fisheries for their business and nutritional needs. Although, section 9.3 only lists five fish species of concern, OPG must	The EIS Guidelines requires that the proponent provide a baseline

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			<p>conduct sociological studies to find out which other fish species may be affected by nuclear contamination from the DGR. Most fish are not localized sedentary creatures. Some migrate large distances within the Great Lakes Basin; thus, contaminated fish can affect populations in areas outside of the Bruce Point area. Furthermore, OPG should include piscivorous birds on the VEC list. Birds which eat fish from Lake Huron and then migrate have the potential of carrying contamination far beyond the reach of the Great Lakes itself.</p> <p>Since birds and fish are only two components of a larger food chain, OPG should consult environmental biologists to determine the effects of radiation on the entire biota of the Great Lakes, not just a few species listed in the proposed EIS.</p>	<p>description of the environment including components of the existing environment and environmental processes.</p>
		10	<p>OPG should include GIS maps of the Great Lakes Basin which identify at the very least the location of existing communities, indigenous groups, groundwater wells, surface water intakes and sources of existing contaminants.</p>	<p>No change. The spatial boundaries can be adapted to include a wider regional area if it is determined that there are environmental effects. Baseline descriptions of the biophysical environment (i.e., groundwater, surface water) and socio-economic conditions (i.e., Aboriginal Land, Aquatic Areas and Resource Use) are required as per the EIS Guidelines.</p>
		10.1	<p>Every section of the bio-physical environment discussion should be expanded to include a wider regional area that includes the United States side of Lake Huron.</p>	<p>No change. The spatial boundaries can be adapted to include a wider regional area if it is determined that there are environmental effects.</p>
		10.1.1	<p>The DGR is proposed to be placed in bedrock which has not been tested. Existing European deep geologic repositories are situated in granite and metamorphic rock, not sedimentary rock. The EIS should include the impact of seismic activity on the storage</p>	<p>The document was revised to reflect this comment. The EIS Guidelines require the proponent to describe the</p>

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			area.	geology and structural geology. The EIS Guidelines require an assessment of the impact of seismic activity.
		11.3	The EIS should examine both individual and cumulative effects of the project.	The document was revised to reflect this comment. The section on Cumulative Effects has been expanded.
		12	OPG should also identify accidents and malfunctions that may occur in the shaft or transport to the dump, or during operations of the Bruce Generating Station or WWMF.	No change. EIS Guidelines require all accidents and malfunctions to be examined including those in the shaft, during transport and at the Bruce and WWMF that may affect the project
		13.2	An explanation should be provided for any scenario that is excluded from the assessment stating what the scenario is and why it was excluded.	Should the Panel require more scenarios to be assessed, they may request that information.
<a href="#">121</a>	Coalition for a Nuclear-Free Great Lakes (CNFGL) (Michael J. Keegan)		Baseline radiological contamination from the Bruce Complex into Lake Huron wind and watershed must be established.  The unique hydrology of Lake Michigan and Lake Huron with potential for reverse flow must be considered. All matters pertaining to the hydrological flows into Lake St. Clair; Detroit River, Lake Erie, Lake Ontario.	The EIS Guidelines requires the proponent to provide a baseline description of the Hydrological environment.
			All communities reliant on Lake Michigan, Lake Huron, Lake St. Clair, Detroit River, Lake Erie, and Lake Ontario are impacted communities, and must be consulted and provided due process as called for by Espoo Convention on transboundary environmental impacts.	No change. The spatial boundaries can be adapted to include a regional area if it is determined that there are environmental effects.

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			Adhere to the Espoo Convention and afford the United States and Indigenous Peoples ample opportunity for participation. This has been scant to date.	
			Full consideration of earthquake potential and fault lines must be part of these proceedings.	No change. The EIS Guidelines require a description of structural geology as well as faults and fractures at the site and within the local and regional study area.
			Incineration of radionuclides is not acceptable. Full disclosure of existing incineration and potential for increased incineration must be part of these proceedings.	No change. Incineration is already part of the licensed activities at the Western Waste Management Facility. Incineration is not within the scope of the proposed project.
			Several proposals / projects and comment periods are running concurrently. This amounts to "Segmentation" of the Full Environmental Impact of the Nuclear Industry on the respective Nations and communities. This "Segmentation" is not acceptable and must be part of the proceedings. The potential for New Build at the Bruce site certainly does impact the contemplated DGR. The announcement of New Build at Darlington certainly does impact the contemplated DGR.	Not a comment on the Guidelines.
			<p>The Deep Geologic Repository if built and loaded would be irreversible. This proposal requires an Independent Full Panel Review.</p> <p>The Independent Full Panel Review must be Independent. As the Panel Review is currently put forth the Canadian Nuclear Safety Commission will dominate the process.</p> <p>The CNSC participation at any level is not acceptable and taints the Independence. This begs the question why was it necessary to stack the deck before the proceedings began? This stacking of the Panel Review turns these proceedings into a sham and a mockery.</p>	The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the CNSC.

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			The International Joint Commission has called for virtual elimination of persistent toxic chemicals into the Great Lakes. Radionuclides are among the most persistent toxics known. The perpetual assaults by the nuclear industry on the Great Lakes are not acceptable. Stop It!	
<a href="#">122</a>	Robert Tyler		Due to the sensitive nature of siting radioactive waste next to 20% of the world's fresh water, the impact area of this unprecedented proposed deep geological repository should be expanded to include Michigan and all the other Great Lakes states and all communities and fisheries in the Great Lakes Basin downwind and downstream, including the numerous Indigenous and First Nation communities and fisheries.	No change. Spatial boundaries can be adapted to encompass Great Lakes if it is determined that there are environmental effects.
			In order to insure that the safest, most prudent decision is reached, it is necessary for the panel membership to be unbiased AND entirely independent of the nuclear establishment in Canada, and most obviously must exclude members of the Canadian Nuclear Safety Commission. The CNSC members will of course be welcome to offer their informed comment, but as both regulators and promoters of nuclear power cannot offer unbiased oversight of this critical set of procedures. Other members of the nuclear establishment have even less legal restraint to offer complete and balanced comment or oversight, and indeed may well have fiduciary obligations to put the best possible light on matters.	The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the CNSC.
			Due to the potentially extremely sensitive, persistent health effects of this proposed project, the comment period should be extended by a minimum of 90 days so as to allow properly informing all the communities downwind and downstream of the proposed repository.	Comment noted.
			As part of the effort to properly inform all affected communities, it is necessary for the Canadian Environmental Assessment Agency to publicize and hold informational meetings in Michigan.	The document was revised to reflect this comment. The <i>Canadian Environmental Assessment Act</i> does not exclude public outside Canada.

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				The EIS Guidelines require that the proponent describe participation opportunities for non-Canadians.
			And lastly, the Great Lakes Joint Commission needs to be included in the process. These lakes being their focus of study, their counsel may be the most pertinent.	The EIS Guidelines requires that the proponent summarize and discuss applicable international agreements. Attention must be paid to bi-national treaties and agreements.
<a href="#">107</a>	Tony McQuail		I hope that the terms of reference will allow for considerable focus on the alternatives to the proposal that would allow for the non-production of the low and intermediate level wastes as well as the high level radioactive wastes.	Comment did not request changes to the EIS Guidelines.
			I would hope that it would also allow for the examination of evidence of the actual current environmental impact of radiation in the Huron-Bruce area and where necessary set up studies to collect and analyze both human, plant and animal/bird data for the area.	No change. The EIS Guidelines state that the existing environment with respect to all species within the site study area, local study area and regional study area must be described.
			The terms of reference should consider the whole nuclear fuel cycle and it's long term environmental impact since a "waste disposal" site will be used to justify the continuation of the whole fuel cycle and will be used to support claims that nuclear energy is environmentally better than other energy options	No change. The EIS Guidelines consider the lifecycle of the project
			If, as the Canadian Cancer Society says, we should try to "make cancer history" then we need to stop producing highly carcinogenic radioactive wastes.  Setting up a disposal system to enable the ongoing and increasing use of nuclear power - particularly with no long term disposal mechanism for the more highly radioactive fuel	Comment does not request changes to the EIS Guidelines.

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			wastes is irresponsible. To place it near the coast of one of the great lakes is particularly troubling.	
<a href="#">91</a>	St. Clair County Water Quality Board (Geoffrey Donaldson, AICP)		Resolution 08-01 in opposition to DGR or any other underground repository to be constructed near shore of any Great Lakes or connecting highways.	Not a comment on the EIS Guidelines.
			The States federal Act 204 of 1987 created the Low-Level Radioactive Waste Authority (LLRWA) who established a facility siting process in 1989 which effectively excludes any site “located within 10 miles of Lake Michigan, Lake Superior, Lake Huron, Lake Erie, St. Mary’s River, Detroit River, St. Clair River or Lake St. Clair;” The LLRWA has determined that it is impossible to find a site within the state which would meet all of the siting criteria set forth in Act 204, effectively halting any facility siting activities in the State of Michigan.	No change made to the EIS Guidelines. This act is not within Canadian jurisdiction.
			That the Regional Study Area identified in the draft EIS be expanded to include those Michigan local units of government that border Lake Huron.	No change. Spatial boundaries can be adapted to encompass Great Lakes if it is determined that there are environmental effects
			Public comment deadline be extended 90 days beyond June 18 <sup>th</sup> .	Comment noted.
<a href="#">106</a>	Jan Saecker		After joining US governors in long-term plans to protect the invaluable Great Lakes, the Canadians not only replaced their chief regulator, but are threatening the entire system of fresh water — and surrounding life — with a plan designed to contaminate the area. We cannot envisage the long life of nuclear wastes. Until we know how to prevent radiation contamination from wastes already generated, we must stop producing them. Barring that, we must protect the Great Lakes basin.	Comment does not request changes to the EIS Guidelines.
<a href="#">105</a>	Georgina McDonald		The following are my concerns related to the 1) Joint Panel Agreements for both the	

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			DGR and Bruce Power Project 2) Environmental Impact Statement Guidelines for Ontario Power Generation’s Deep Geological Repository Project and 3) Environmental Impact Statement Guidelines for the Bruce Power New Nuclear Power Plant Project.	
			<p>1. The EIS Guidelines state that the Joint Review Panels will consist of three people, that they are to be selected by CNSC and MOE, that two of the three members will be chosen by CNSC, CNSC will chair the panel, and that following their review, that CNSC, as a temporary member, will have the ability to grant licenses for site preparation and construction. In this case, Panel members will not be independent or impartial, and should not have the power to grant a license to the proponent.</p> <p>There is no indication of the educational or experience requirements for the panel. The panels, at minimum, should number 5, and CNSC members should not be a majority, and the panels be composed of recognized experts in the field of geology, mathematics, biology/ecology, radiation physics, and economics.</p>	The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the CNSC.
			<p>2. All of the predictions of environmental effects are based on complicated mathematical models. In order for the public to have confidence in models and modellers, whether related to energy production or waste storage, an independent assessment, not just a ‘happenstance’ peer review, should be conducted on behalf of the public. Both guidelines note that a follow-up program may have “possible involvement of independent researchers”. The EIS Guidelines should set out a more rigorous framework to ensure involvement of independent researchers earlier in and throughout the process.</p>	No change. Technical specialists will be involved throughout the process.
			<p>3. The EIS Guidelines do not indicate that the proponent should document estimates of costs involved for every stage and aspect of these intended projects. Nuclear and hazardous wastes are liabilities. Costs associated with each aspect of the impact statement will certainly affect decisions made regarding mitigation choices, alternatives, monitoring programs and decommissioning. In relation to both OPG (waste management) and Bruce Power (generation), all nuclear energy production,</p>	No change, not a comment on the EIS Guidelines.

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			<p>from mining to waste management is financially supported by electricity users and taxpayers, and the respective EIS documents should set out how and when and by whom these costs are to be paid.</p>	
			<p>4. There is little mention of transportation of wastes to the DGR. This should be fully examined and disclosed.</p>	<p>No change was made to the EIS Guidelines. Transportation is not within the scope of the project as the waste is and would continue to be at the Western Waste Management Facility, which is adjacent to the proposed site for the DGR.</p>
			<p>5. The EIS should set out what wastes (source, type, amounts, hazards etc.) will be generated through decommissioning and refurbishment.</p>	<p>No change. The amount, type and source of waste must be outlined in the EIS as per the EIS Guidelines.</p>
			<p>6. Comment not included as it was for a different project.</p>	
			<p>7. There is little or no mention of the farming community and domestic animals (cattle, sheep) as Valued Ecosystem Components. Additionally the list of VEC’s seems rather limited.</p>	<p>No change made to the EIS Guidelines. No enough detail provided.</p>
<p><a href="#">80</a></p>	<p>E.R.S. University of Waterloo (Robert B. Gibson and Tanya Markvart)</p>		<p>The Contribution to Sustainability Test: 1. Elaboration of the main generic implications for assessment studies and reporting, particularly with regard to frameworks and criteria for evaluation of effects and options. 2. Requirements for specifying the frameworks and criteria to recognize the particular context and concerns for the proposed DGR project.</p>	<p>No change to the EIS Guidelines. The proponent is required to include in the EIS consideration of the extent to which the Project contributes to sustainable development, in particular a) the extent to which biological diversity may be affected by the Project and b) the capacity of</p>

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			<p>3. Revisions to ensure that guidance on other matters is consistent with the commitment to sustainability.</p> <p>4. Language similar to that of the Mackenzie Gas Project Terms of Reference s.5.1 and “Determination on Sufficiency” (see the paragraphs above) should be incorporated in the EIS Guidelines to clarify for the proponent and other participants the basic test to be applied in the review.</p> <p>5. Concerning the basic approach, the EIS Guidelines should specify:</p> <ul style="list-style-type: none"> <li>i) that the Panel will be applying a “contribution to sustainability” test defined as the extent to which a project makes a positive overall contribution towards biophysical, social, cultural and economic sustainability and, in this light, is the most desirable of the reasonable and feasible options available</li> <li>ii) that the Panel will evaluate the specific and overall sustainability effects of the proposed project and whether the proposed project will bring lasting net gains and whether the trade-offs made to ensure these gains are acceptable in the circumstances</li> <li>iii) that the proponent must show: <ul style="list-style-type: none"> <li>a. how the contribution to sustainability objective has been addressed in the selection, planning and design of the project, including through the adoption, specification and application of a comprehensive set of sustainability-based evaluation criteria</li> <li>b. that the proposed project will bring lasting net gains</li> <li>c. that the trade-offs made to ensure these gains are acceptable in the circumstances</li> <li>d. that the proposed project is, in light of sustainability contribution, the most desirable option in comparison with all other relevant and potentially reasonable nuclear supply options and non-renewable and renewable supply</li> </ul> </li> </ul>	<p>renewable resources that are likely to be significantly affected by the Project to meet the needs of the present and the future.</p>

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			<p>options</p> <p>e. how the proposed systems for monitoring, management and reporting throughout project life, decommissioning and post-decommissioning have incorporated indicators of sustainability effects</p> <p>f. how the views of stakeholders and other participants in the assessment process have been addressed in the assessment work, including in specification and application of the sustainability based evaluation criteria and the evaluation of trade-offs.</p> <p>6. Concerning key sustainability considerations to be incorporated in the set of sustainability based evaluation criteria, the EIS Guidelines should specify that these include (though are not to be limited to) attention to the following:</p> <ul style="list-style-type: none"> <li>i) the capacity of natural systems to maintain their structure and functions and to support indigenous biological diversity and productivity</li> <li>ii) the capacity of the social and economic systems of the human environment to achieve, maintain or enhance conditions of self-reliance and diversity</li> <li>iii) the capacity of human environments, including local and regional institutions, to respond to and manage anticipated and unanticipated project-related and externally induced change</li> <li>iv) protection and enhancement of desired social, cultural and community qualities</li> <li>v) the attainment and distribution of lasting and equitable social and economic benefits</li> <li>vi) protection and conservation of wildlife, the environment and associated ecological/biophysical goods and services for present and future generations</li> <li>vii) the rights of future generations to the sustainable use of renewable resources</li> </ul>	

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			<p>viii) the avoidance of long term costs and other adverse effects for future generations.</p> <p>7. Concerning the adoption, specification and application of a comprehensive set of sustainability-based evaluation criteria as a basic framework for the proponent's assessment, the EIS Guidelines should encourage the proponent to:</p> <ul style="list-style-type: none"> <li>i) prepare and apply an explicit set of evaluation criteria that combine comprehensive generic sustainability criteria with more specific criteria that identify and address the major particular considerations for the case and context</li> <li>ii) include this in a framework for evaluation of the project and relevant alternatives with attention to interrelated and overall effects and trade-offs as well as effects tied to individual criteria</li> <li>iii) ensure opportunity for public discussion of and comment on the draft framework early enough for adjustments to inform the preparation of the EIS</li> </ul> <p>8. Concerning the adoption, specification and application of a comprehensive set of sustainability-based evaluation criteria as a basic framework for the panel's assessment review, the EIS Guidelines should inform the proponent and other participants that, early in the process, the panel will:</p> <ul style="list-style-type: none"> <li>i) draft a proposed set of evaluation criteria for the review</li> <li>ii) ensure that this set of criteria combine comprehensive generic sustainability criteria with more</li> <li>iii) specific criteria that identify and address the major particular considerations for the case and context</li> <li>iv) include these criteria in a framework for evaluation of the project and relevant alternatives with attention to interrelated and overall effects and trade-offs as well as effects tied to individual criteria</li> <li>v) ensure opportunity for public discussion of and comment on the draft framework</li> </ul>	

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			<p>early enough for adjustments to inform the entire review</p> <p>vi) adjust the framework as appropriate throughout the process as new issues and understandings emerge</p> <p>vii) use the framework explicitly in the preparation of a final report.</p>	
			<p><b>Scope of Assessment and Definition of Environment</b></p> <p>1. In a designated section of the Guidelines, the scope of the assessment should be defined explicitly to clarify for the proponent and other participants the full suite of effects – biophysical, social, economic, cultural and their interrelations, direct and indirect, particular and cumulative – to be addressed, to cover all key matters of concern and to be consistent with the contribution to sustainability test.</p>	<p>No change. The EIS Guidelines provide detailed guidance on outlining the scope of the project and the factors to be assessed.</p>
			<p><b>Purpose, Need, and Alternatives</b></p> <p>1. The DGR draft Guidelines should specify that the purpose of the project is to meet current anticipated Ontario needs for permanent secure disposal of low and intermediate level radioactive waste, including accumulated wastes already accumulated, now being produced, and anticipated from future nuclear projects and decommissioning.</p>	<p>The EIS Guidelines state that the proponent defines the purpose of the project.</p>
			<p>2. The DGR draft Guidelines should be revised to require sustainability-based evaluation of the project in comparison with the other potentially reasonable options for low and intermediate radioactive waste management, and should specifically require attention to locations with different:</p> <ul style="list-style-type: none"> <li>▪ deep repository rock, with possibly different long term integrity, distance from faulting, absence of ground water movement, etc.</li> <li>▪ receiving site capacity, security, and proximity to valued ecological, social and socio-ecological system components, etc.</li> </ul>	<p>No change to the EIS Guidelines. Socio-economic effects are identified in Guidelines and will include both positive and negative effects. Transportation is not within the scope of the project as the waste is and would continue to be at the WWMF — adjacent to the proposed site for the DGR</p>

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			<ul style="list-style-type: none"> <li>▪ implications for transportation of wastes to the site</li> <li>▪ host communities.</li> </ul>	
			<p>3. The DGR draft Guidelines should require the proponent to analyze the positive and negative environmental (social, economic, cultural, and biophysical) effects of each alternative and demonstrate through a comparative evaluation that the preferred alternative is the least harmful and most beneficial nuclear waste option for the long term. The methods and criteria used to determine these effects should be described explicitly in the EIS.</p>	<p>The document was revised to reflect these comments. The EIS Guidelines requires the proponent to explain how they developed criteria to identify the major environmental, economic, and technical costs and benefits of these alternatives.</p>
			<p>4. The DGR draft Guidelines should require the proponent to list the range of nuclear waste options currently available and the criteria used to determine the particular range of nuclear waste options considered in the EIS.</p>	<p>No change to the EIS Guidelines. The EIS Guidelines states that the range of alternatives that may be analyzed may include but is not limited to the status quo and surface or near-surface storage.</p>
			<p><b>Project Description and Alternative Means of Carrying out the Project</b></p> <ol style="list-style-type: none"> <li>1. The draft Guidelines should be revised to include transportation of wastes to the site as part of the project.</li> <li>2. The draft Guidelines should be revised to require the proponent to consider issues related to timing and scale in their evaluation of the project from site preparation to abandonment, and in their evaluation of the project in comparison with alternatives.</li> <li>3. These options need to be described and assessed in light of potential cumulative effects and means of anticipating and mitigating or enhancing these effects.</li> </ol>	<p>No change. The transportation of waste is not within the scope of the project as waste is and would continue to be at the Western Waste Management Facility, which is adjacent to the proposed site for the DGR.</p> <p>The document was revised to reflect this comment. The EIS Guidelines requires the proponent to include in its assessment of alternative means of</p>

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				<p>carrying out the project, the timing options for various components and phases of this proposed project. Further, the proponent must describe the total cumulative effect on a valued ecosystem component over the life of the project.</p>
			<p><b>Application of the Precautionary Principle</b></p> <ol style="list-style-type: none"> <li>1. Language similar to that of the Voisey's Bay Guidelines s.3.4 and Whites Point Guidelines s. 3.5 (see appendix 4) should be incorporated in the DGR Guidelines to express explicitly the requirements for the application of the precautionary principle in review decision-making.</li> <li>2. Specifically, the Guidelines should incorporate the following fundamentals:               <ol style="list-style-type: none"> <li>i) list the particular project activities and/or the particular project circumstances to which the precautionary principle should be applied</li> <li>ii) list the requirements of the application of the precautionary principle</li> <li>iii) list the ways that the proponent shall indicate how the undertaking's selection and design conform to the precautionary principle.</li> </ol> </li> <li>3. The Guidelines should be adjusted to ensure that the proponent must demonstrate the adequacy of any precautionary steps taken to reduce the likelihood or severity of project risks, or to reduce potential exposure to external risks.</li> <li>4. The Guidelines should be adjusted to ensure that the proponent must evaluate and compare project alternatives in light of risk avoidance, adaptive and management capacity, and preparation for surprise.</li> <li>5. The Guidelines must require the proponent to describe the local, regional, provincial,</li> </ol>	<p>The document was revised to reflect these comments. The EIS Guidelines require that the proponent:</p> <ul style="list-style-type: none"> <li>▪ Demonstrate that all aspects of the project have been examined</li> <li>▪ Outline and justify the assumptions made about the effects of all aspects of the project.</li> </ul> <p>Further, EIS Guidelines requires that the alternative means of carrying out the Project be considered in the precautionary approach.</p>

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			and federal capacity for management, monitoring, and response available now and over the lifetime of the project.	
			<p><b>Public Participation, Engagement of Aboriginal Peoples, and Use and Respect for Traditional Knowledge</b></p> <p>1. Language similar to that of the Whites Point Guidelines and the Mackenzie Gas Project Guidelines (see appendix 5) should be incorporated in the DGR draft Guidelines to express explicitly the requirements for public participation. Specifically, the Guidelines should incorporate the following:</p> <ul style="list-style-type: none"> <li>i) a more detailed definition of traditional knowledge and a list of the particular stages, components, and issues of the project to which traditional knowledge may contribute a better understanding</li> <li>ii) stronger language to match the language used in the Whites Point sections.3.1; 3.2; 8.2 and Mackenzie Gas Project Guidelines sections 5.2 and 10</li> <li>iii) a list of specific actions that the proponent must take in order to: <ul style="list-style-type: none"> <li>a) outline the engagement activities undertaken;</li> <li>b) identify and report on the key issues raised by the public; and</li> <li>c) describe how the issues and concerns of the public were addressed;</li> <li>d) a “Recognition of Diversity” principle similar to that incorporated in subsection 5.4 of the Mackenzie Gas Project Guidelines; and</li> <li>e) a requirement that Aboriginal and other local people participate in specifying the concerns related to socio-economic systems.</li> </ul> </li> </ul>	<p>The document was revised to reflect these comments. A more detailed definition of Traditional Knowledge has been added to the EIS Guidelines. Further, the EIS Guidelines states that the proponent must “<i>include the highlights of public engagement (including the methods used, the results, how the concerns will be addressed) and a summary of issues raised.</i>” The EIS Guidelines details the proponent’s requirements regarding Aboriginal engagement.</p>
			<p><b>Cumulative Effects</b></p> <p>1. Language similar to that of the Whites Point Guidelines s.11 and the Mackenzie Gas Project Guidelines s.17 (see appendix 6) should be incorporated in the DGR</p>	<p>Changes were made to the EIS Guidelines that provides more detail to the proponent regarding the</p>

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			<p>Guidelines to express explicitly the requirements for considering cumulative impacts. Specifically, the Guidelines should be adjusted to include the following:</p> <ul style="list-style-type: none"> <li>i) a list of considerations that the proponent must include in its assessment of cumulative environmental effects, including the different forms of impacts that should be considered (synergistic, additive, induced, etc.), and the suite of environments (biophysical, biological, and human) that are likely to be affected</li> <li>ii) requirements to integrate attention to cumulative effects and their implications for impact thresholds, etc. in the consideration of project effects (e.g. on particular VECs) in addition to including a special section on cumulative effects</li> <li>iii) requirements to consider the implications of potential cumulative effects for project timing and scale</li> <li>iv) requirements for attention to any significant environmental and socio-economic effects outside the regional study area</li> <li>v) requirements for attention to the cumulative effects that may result from, or be exacerbated by project malfunctions, accidents, and malevolent acts</li> </ul> <p>The draft Guidelines should be revised to require the proponent to consider in their assessment of cumulative effects, social and biophysical issues related to project timing and scale, from site preparation through abandonment, and in light of the timing, scale and other characteristics of other projects (past, present, and reasonably foreseeable) occurring in the project areas, with particular consideration of possible concurrent work on the proposed new build nuclear, refurbishment, and transmission expansion projects.</p> <ol style="list-style-type: none"> <li>2. The Guidelines should identify, as illustrations, major current and reasonably anticipated projects and activities in the area that must be included in consideration of cumulative effects.</li> <li>3. The Canadian Environmental Assessment Agency should, in cooperation with other relevant federal and provincial authorities, organize a regional cumulative effects</li> </ol>	<p>requirements for considering cumulative effects.</p>

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			assessment to anticipate the cumulative effects of the multiple, possibly overlapping undertakings underway and anticipated in the area and to identify implications for the planning, decision making and implementation of all of these projects.	
			<p><b>Attention to Bridging Effects</b></p> <p>1. The Guidelines should be amended to include a requirement for integrated consideration and analysis of how the proposed project through its implementation and including its decommissioning will maintain and enhance local and regional resources, capacities and opportunities so as to act as a bridge to a more sustainable future there.</p>	No change was made to the EIS Guidelines. The EIS Guidelines require that the proponent consider how the Project contributes to sustainable development.
			<p><b>Attention to Enhancement as well as Mitigation Opportunities</b></p> <p>1. Consistent with the larger objective of ensuring that any approved undertaking makes the maximum positive contribution to sustainability, the draft Guidelines should be amended throughout to require attention to</p> <ul style="list-style-type: none"> <li>i) positive as well as adverse effects; and</li> <li>ii) enhancement of positive effects as well as mitigation of adverse effects, including in the comparative evaluation of alternatives.</li> </ul>	No changes made. The <i>Canadian Environmental Assessment Act</i> does not require the proponent to assess positive effects of the project.
			<p><b>Attention to Socio-Economic Effects</b></p> <p>1. Language similar to the Mackenzie Gas Project Guidelines s. 11.1 and s. 11.5.1.</p> <p>2. (See appendix 7) should be incorporated in the DGR Guidelines to express explicitly the requirements for the description of the existing environment, and the human environment in ways that recognize interrelations, system functions and vulnerabilities.</p> <p>3. The Guidelines should be adjusted to ensure that the proponent’s description of the existing environment is in sufficient detail to identify, assess, and determine the</p>	No change made to the EIS Guidelines. The existing wording in the Guidelines reflects expectations.

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			potential direct and indirect socio-economic impacts caused by the project.	
			<p><b>Consideration of Community and Governance Agency Capacity</b></p> <p>The Guidelines should be adjusted to ensure that the proponent must assess the positive and negative effects of the project, from site preparation through abandonment and long term management, in light of community capacity to take advantage of opportunities, respond to surprise, and respond to and manage adverse impacts.</p>	Comments noted. No change to EIS Guidelines was made.
			<p><b>Consideration of Risks</b></p> <ol style="list-style-type: none"> <li>1. The Guidelines should require the proponent to provide and justify specific conclusions about the vulnerability of the project and its alternatives to potentially significant adverse effects due to accidents, malfunctions and malevolent acts.</li> <li>2. The Guidelines should ensure that the proponent, through consultations with the public, develops satisfactory evaluation criteria for assessment of the implications of the vulnerability to, and the potential severity of effect from, malfunctions, accidents, and malevolent acts associated with the project, including their social and ecological effects, in comparison with alternatives.</li> <li>3. The Guidelines should ensure that the proponent is required to include in the safety assessment a range of scenarios—from normal evolution scenarios to disruptive events, including potential accidents, malfunctions and malevolent acts that may happen over the very long lifetime of the proposed project and its alternatives.</li> <li>4. The Guidelines should ensure that the proponent, through consultations with the public, develops satisfactory evaluation criteria for the results of the safety assessment scenarios.</li> </ol>	No change made to the EIS Guidelines. The existing wording in the Guidelines reflects expectations.
			<p><b>Resilience</b></p> <ol style="list-style-type: none"> <li>1. The required descriptions of the existing social and economic as well as ecological</li> </ol>	No changes made to the EIS Guidelines. The proposed changes are not requirements of the <i>Canadian</i>

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			<p>environments should include attention to system resilience, including valued qualities, vulnerabilities, recognized stresses and both desirable and undesirable trends.</p> <p>2. The proponent should be required to identify and evaluate potential effects on the resilience of community and regional social and economic systems, and ecosystems. In the DGR case, attention to effects on the resilience of the overall electrical power system should also be included.</p> <p>3. Positive contributions to the resilience of the electrical power system, community and regional social and economic systems, and ecosystems should be included in the criteria for evaluation, including comparison of alternatives.</p> <p>4. The Guidelines should require monitoring of emerging risks as well as monitoring of project performance, and the criteria for evaluation of options should include flexibility of project design and implementation to accommodate changes to recognize emerging risks and incorporate new means of enhancing containment integrity.</p>	<p><i>Environmental Assessment Act.</i></p>
<p><a href="#">104</a></p>	<p>Paula Lombardi, LLB for Eugene and Ann Bourgeois</p>		<p>The scope of the project should detail the physical works, underground facilities and site infrastructure. Until these are specified, the technical assessment is premature.</p>	<p>No change. Scope of project outlines physical works to be carried out.</p>
			<p>International and policies, directives and regulations of the United States of those areas across the boarder potentially impacted by the DGR should also be taken into account when preparing the environmental impact statement. The proponent should be required to assess the effects of the potential for leakage of radioactivity from the DGR and its impact on the citizens of Michigan, Ohio as the project location is only 50 miles across Lake Huron.</p>	<p>No change. Spatial boundaries can be adapted to encompass Great Lakes if it is determined that there are environmental effects.</p>
			<p>The guidelines should require the proponent to take into account the following when assessing the alternatives to the proposed project. 1) do nothing 2) other possible nuclear</p>	<p>No change was made to the EIS Guidelines. The EIS Guidelines states that the proponent may identify and</p>

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			<p>sites for disposal and 3) other locations such as the Canadian Shield.</p> <p>Alternative means should include other locations. The environmental effects of each feasible alternative should be assessed in detail to allow the public and federal review team to conduct an objective comparison of the various alternatives.</p>	<p>consider any alternatives to the DGR that are within the control and/or interest of the proponent. Alternatives may include but are not limited to a) status quo or 2) surface and near-surface storage.</p>
		10.2	<p>The proponent needs to undertake a detailed assessment of the socio-economic environment and the environmental effects of any change that the proposed project and its alternative means may cause on the socio-economic environment as part of the EIS. The scope of the assessment needs to be broaden to include many factors (i.e. use and enjoyment of property, safety, landscapes, etc).</p>	<p>No change was made to the EIS Guidelines. In describing alternatives means of carrying out the project, the proponent should identify the relative consideration of environmental effects, technical and economic feasibility, including the socio-economic environment, if applicable.</p>
			<p>Interaction of socio-economic effect for each Alternative To should be assessed. Socio-economic conditions should be expanded to include many factors (i.e. impacts on local farmland, crops; emergency response, etc)".</p>	<p>No change was made to the EIS Guidelines. Guidelines do require socio-economic effects of economic factors</p>
<a href="#">119</a>	Leanne Romanowski		<p>As a resident of Michigan and a property owner in Inverhuron, I would urge you not to approve a radioactive waste storage site at the Bruce power plant. I am the 5th generation of my family to enjoy the natural beauty of this area and wish for my children to continue to be able to do so. Not only does the area in question support much wildlife but it also sits on one of the world's largest supplies of fresh water. The precious resource and the surrounding countryside, which produces food for both of our countries, should be protected at all costs. Surely, there would be a more suitable location somewhere that is not directly connected to the Great Lakes.</p> <p>I know that many folks perceive this as a boost for the local economy, but it would be a</p>	<p>Comment does not request changes to the EIS Guidelines.</p>

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			<p>poor trade-off for the environmental damage that could happen. Radioactive contamination would also impact the tourist industry that many of the local people in the area depend on for their livings</p> <p>It is our duty to protect our freshwater source that millions of people in both of our countries rely upon.</p>	
<a href="#">44</a>	Wanda Laurin		<p>As a resident of Canada, I am very opposed to the proposal to construct a nuclear waste "dump" or repository on the shores of Lake Huron. The idea of putting such dangerous and potentially catastrophic waste near the water that supplies hundreds of thousands of Canadian and American residents should never be entertained. It appears that the Canadian Taxpayer is again going to be paying for nuclear industry problems and wastes. I would really hope that we can put this industry in long-term abeyance (as soon as possible), and wash our collective hands of what has proven to be an incredibly expensive, dangerous, and environmentally damaging energy source.</p>	<p>Comment does not request changes to the EIS Guidelines.</p>
<a href="#">125</a>	Michigan Congressman (Bart Stupak)		<p>Concerned that by relying on the proponent of the project to conduct the EIS, the data necessary to determine whether the project will threaten Lake Huron will not be fully and completely collected.</p> <p>Concerned that the location of site being less than 1 mile from Lake Huron is a significant risk to the environment. Alternative locations for nuclear waste should be investigated.</p> <p>Concerned that the location being close to high-level waste which is already temporarily stored at the site would increase the risk of danger to Lake Huron.</p> <p>Will continue to work with Canadian and US representatives on issue.</p>	<p>No change was made to the EIS Guidelines. The comments do not request changes to the EIS Guidelines.</p>
<a href="#">73</a>	Southeast Michigan Group of the Sierra Club (Ed McArdle)		<p>Due to the unprecedented nature of the proposal to store nuclear waste near the Lake Huron shoreline, we strongly urge you to extend the period of comments at least 90 days to allow full information and review of this project.</p>	<p>Comment noted.</p>

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			<p>There has been very little information about this project received on the U.S. side of the border. Millions of people on both sides of the border depend on the Great Lakes for their drinking water and other uses. The main intakes for drinking water for the entire southeast Michigan metropolitan area are located in Lake Huron and Lake St. Clair both downstream from your project. We strongly urge you to allow the extension and enable all stake holders’ opportunity to express their views.</p>	<p>Comment does not request changes to the EIS Guidelines.</p>
<p><a href="#">85</a></p>	<p>Andrea Welz</p>		<p>I would like to register my opposition to the deep geologic repository for low and intermediate level radioactive wastes project. I believe the Ontario government should be phasing nuclear power out, not looking at ways to expand it and this proposal seems to be supporting a move to increase this type of power production. The storage of these wastes has always been an issue and I do not feel that the proposal outlined addresses long-term health and environmental consequences.</p> <p>I would like to register as an interested party and to be kept informed of activities relating to the panel-review process.</p>	<p>No change was made to the EIS Guidelines. The EIS Guidelines do request that long-term safety be examined.</p>
<p><a href="#">103</a></p>	<p>Carl Hunt</p>		<p>I couldn’t find the reports about the proposed project until today so hesitate to comment specifically about the documents however I have strong concerns about the whole process of developing nuclear energy in Canada. For several years I have tried to understand the nuclear industry proposals in Alberta.</p> <p>In Alberta the nuclear promoters are going around to small communities that need new developments (as conventional oil &amp; gas drilling declines) and offer to build big plants and bring economic prosperity etc. They are like circus barkers passing out free trips and making their pitch to Town &amp; County Councils and the general public that have no concept of nuclear risk. A few local concerned citizens try to understand the environmental and social costs in addition to the economic benefits but as always the industry has the public relations budgets and the ‘experts’. Independent scientists that work for government and supposedly for the public never seem to be available to debate</p>	<p>No change was made to the EIS Guidelines. The comments do not request changes to the EIS Guidelines.</p>

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			<p>with industry.</p> <p>I can't even comprehend the long term risks of a waste dump within a few kilometres of the Great Lakes and in Alberta they want to establish nuclear plants near our major rivers such as the Peace and Athabasca. The risk of contamination may be very low but over the next 1000+ years, with unknown changes in climate etc, the cost of a small error in geological or technical assessment, would be unthinkable. After fifty years of nuclear developments the industry can't even design safe reactors (Maple) to produce medical isotopes.</p> <p>What I really object to is the piecemeal approach to nuclear developments from mining to nuclear plants, national security and waste disposal. Somehow the profits continue to flow to private companies and the costs are paid by taxpayers. Two and threefold cost over-runs seem like a way of doing business. The Federal Government is responsible for the cleanup of the old, low level nuclear mining waste that is still polluting, soil, lakes and ground water in Ontario, Saskatchewan and NWT. New facilities require government to accept the accident risk liability because it is too dangerous for private insurance companies. The current government has lost all credibility to ensure public safety by interfering in the required standards at Chalk River.</p> <p>Canada needs a comprehensive review of the science, potential benefits and long term risks of nuclear energy. Private operators and interests must be stopped from developing public policy by promoting local projects and making individual applications for each step of a complex and potentially dangerous source of energy.</p> <p>I oppose the dump site near Lake Huron but even more I oppose the fragmented review process that is being followed by the Canadian Environmental Assessment Agency.</p>	
<a href="#">41</a>	Jackie Jablonski		<p>I am very worried about the proposal to dump nuclear waste near Lake Huron in Kinkardine, Ontario. The Great Lakes contain 20% of the world's freshwater supply, and no part of its system can be damaged without risking damage to this entire region. And there may be no way to accurately assess the risks created by this repository over the</p>	<p>Comment does not request changes to the EIS Guidelines.</p>

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			<p>radioactive life of the waste material that would be dumped there. Thus it is absolute urgent that the evaluation of the Bruce Nuclear Repository's environmental impact be as precise, thorough, and extensive as is possible.</p> <p>At this point in the process, I have the following concerns:</p>	
			<p>1. Michigan — and indeed ALL communities in the Great Lakes Basin — must be included in the study.</p>	<p>No change. Spatial boundaries can be adapted to encompass Great Lakes if it is determined that there are environmental effects.</p>
			<p>2. No industry representatives — or anyone who could potentially profit from the project--should be allowed to be on the Environmental Impact Panel. That includes the current members of the Canadian Nuclear Safety Commission.</p>	<p>Comment does not request changes to the EIS Guidelines. The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission. The Panel will comprise independent members and not current members of the Canadian Nuclear Safety Commission.</p>
			<p>3. Additional time — at least 90 days beyond the current deadline — should be granted for the comment period.</p>	<p>Comment noted.</p>
			<p>4. The Canadian Environmental Assessment Agency should hold informational meetings in Michigan and other impacted parts of the United States, in addition to meetings in Canada.</p>	<p>The document was revised to reflect this comment. The <i>Canadian Environmental Assessment Act</i> does not exclude public outside Canada. The EIS Guidelines require that the proponent describe public</p>

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				participation opportunities for non-Canadians.
<a href="#">113</a>	Connie Saltonstall		As a citizen and potential member of Michigan's House of Representatives (105th District), I wish to request more time and study be devoted to the question of the proposed nuclear waste repository almost on the shores of Lake Huron.	Comment noted.
			In addition to expressing my concerns to you I am sending a copy to Michigan Governor Jennifer Granholm, requesting she step in on this issue in behalf of the citizens of Michigan.  The potential impact of this repository on all the Great Lakes must be studied in greater depth. This is a fragile natural and human ecosystem; the health of the Great Lakes is essential to the well being of both Canadian and U.S. citizens throughout the Great Lakes basin.	Comment did not request changes to the EIS Guidelines.
			We must not jeopardize this vital resource now or for future generations. The waters of Lake Huron are contiguous with all the waters of the Great Lakes. The vital fishery is not limited to any small area. Lake Huron supplies the drinking water for many communities.  Therefore, I request that the impacted area of this repository be expanded to include Michigan and all communities of the Great Lakes.	No change. Spatial boundaries can be adapted to encompass Great Lakes if it is determined that there are environmental effects.
			Request that informational meetings be held throughout the Great Lakes Basin, on both sides of the international border.	The document was revised to reflect this comment. The Canadian Environmental Assessment Act does not exclude public outside Canada. The EIS Guidelines require that the proponent describe public participation opportunities for non-

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				Canadians
			Further, I request that members of any study group be independent of the nuclear industry and be made up of non-affiliated recognized scientific experts on environmental issues.	The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission.
			I also request that the period for comment be expanded for a minimum of another 90 days so that members of the Great Lakes communities have time to respond. This is far too serious an issue to be rushed through a superficial process. The potential negative impact of this repository could last for generations.	Comment does not request changes to the EIS Guidelines.
<a href="#">61</a>	Carol Weyhing		Regarding the proposal by Ontario Power Generation (OPG) to prepare a site, and construct and operate a deep-geologic disposal facility on the Bruce Nuclear Site, within the municipality of Kincardine.	
			1. The impacted area of this unprecedented proposed deep geological repository should be expanded to include Michigan and all communities and fisheries in the Great Lakes Basin downwind and downstream, including Indigenous and First Nation communities and fisheries.	No change was made to the EIS Guidelines. Spatial boundaries can be adapted to encompass Great Lakes if it is determined that there are environmental effects.
			2. The panel should be made up of members entirely independent of the nuclear establishment in Canada and should not include members of the Canadian Nuclear Safety Commission.	The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission. The Panel will comprise independent members and not current members of the Canadian

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				Nuclear Safety Commission.
			3. The comment period should be extended by at least 90 days to properly inform communities downwind and downstream of this proposed repository, that could have grave implications for Great Lakes waters and our gene pool forever.	Comment noted.
			4. Insist that the Canadian Environmental Assessment Agency hold informational meetings in Michigan.	The document was revised to reflect this comment. The <i>Canadian Environmental Assessment Act</i> does not exclude public outside Canada. The EIS Guidelines require that the proponent describe public participation opportunities for non-Canadians.
<a href="#">55</a> & <a href="#">29</a>	Kim White		As a human being, a Canadian citizen, and a resident of Grey-Bruce, I have serious concerns about having a nuclear waste dump in my backyard; and on the shores of our most important freshwater ecosystem. There absolutely MUST be a full and independent assessment of the risks, which is FREE from the influence of the pro-nuclear establishment.  Expressed opposition to the project; and view that Grey-Bruce does not want to leave a legacy of toxic waste for future generations.	Comment do not request changes to the EIS Guidelines.
<a href="#">28</a>	Macomb County Board of Commissioners (William Crouchman)		Macomb County Board of Commissioners opposes a DGR near Kincardine, in the Great Lakes Basin, in Canada, the United States or any First Nation property. The Official Resolution of the Macomb County Board of Commissioners, adopted at its May 15, 2008 Full Board Session was attached.	No change made. Comment did not request changes to the EIS Guidelines.
<a href="#">21</a>	Macomb County Water Quality Board		Macomb County Water Quality Board opposes a DGR in the Great Lakes Basin, in Canada, the United States or any First Nation property. The Official Resolution of the	No change made. Comment did not

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	(Douglas Martz)		Macomb County Health Department was attached.	request changes to the EIS Guidelines.
<a href="#">39</a>	Frank Fawson		<p>The proposal to build a deep underground dump (DUD) for radioactive wastes on the shoreline of the Great Lakes is unacceptable. The DUD would be located just over one kilometre (less than one mile) from the Lake. Water is the most likely dispersal medium for toxic materials in general, and for radioactive wastes in particular.</p> <p>Since the DUD is only 50 miles from Michigan across Lake Huron, leakage of radioactivity from the dump could directly affect tens of millions of residents in Michigan, Ohio, Pennsylvania, and New York, and contaminate the drinking water in Port Huron, Sarnia, Detroit, Windsor, Toledo, Cleveland, Erie, Buffalo, Toronto and countless other communities downstream.</p> <p>The successful emplacement of the DUD for so-called “low” and “intermediate” level radioactive wastes from across Ontario – and potentially from the rest of Canada — will create a threat to the Great Lakes watershed for generations to come. It will also increase the likelihood of the Bruce site becoming a permanent disposal dump for high-level radioactive wastes (i.e. irradiated nuclear fuel), which would increase the risks by many orders of magnitude.</p>	<p>Comment did not request changes to the EIS Guidelines.</p>
<a href="#">77</a>	Mary Ann S. Doherty		Six months ago, the President of the CNSC was fired by the Canadian federal government for being too strict in her enforcement of reactor safety regulations. The new	Comments do not request changes to the EIS Guidelines.

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			<p>CNSC President has clear instructions to fast-track all nuclear regulatory approval processes. No environmental assessment panel will be credible if it is dominated by this highly politicized regulatory agency.</p> <p>Despite the conflict of interest, the CNSC stands ready to chair the environmental assessment panel and to fill two of its three positions. CNSC’s domination of the Full Panel Review is unprecedented, and will undermine the panel's credibility. The CNSC’s should be excluded from the Panel, so the panel's independence is assured.</p>	
77 continued	Mary Ann S. Doherty		<p>Also the public comment deadline should be extended for six months beyond June 18th. Given the longevity and the unprecedented nature of the hazard that the DUD represents for the entire Great Lakes ecosystem, as well as the minimal outreach to the United States and Native American/First Nations that the Canadian federal government has undertaken, this extension request is reasonable.</p>	Comment noted.
			<p>I live in Michigan, the Port Huron area, and am quite disturbed to learn in a roundabout fashion of the Bruce Peninsula project that includes the deep geological repository for radioactive waste. I am concerned that citizens of Michigan were not informed of the repository that will affect our environment and ultimately our lives. We will certainly be affected given that our community is downwind and downstream of this project.</p>	No changes were made to the EIS Guidelines. Spatial boundaries can be adapted to encompass Great Lakes if it is determined that there are environmental effects.
			<p>Informational meetings should be offered in Michigan, as well as other Great Lake communities that will be affected.</p>	The document was revised to reflect this comment. The <i>Canadian Environmental Assessment Act</i> does not exclude public outside Canada. The EIS Guidelines require that the proponent describe public participation opportunities for non-Canadians.
			<p>I would feel greater comfort if the joint panel review members were an independent and</p>	The Joint Review Panel will be an

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			<p>autonomous body of reviewers. My understanding is that the 'foxes are guarding the hen house'. Members of the Canadian Nuclear Safety Commission, in fact members involved with the Nuclear Establishment in Canada, should not be the deciding members.</p> <p>Please inform me when there will be an informational meeting on this in the general area of Port Huron.</p>	<p>independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission. The Panel will comprise independent members and not current members of the Commission.</p>
<p><a href="#">144</a></p>	<p>Jim Prentice</p>		<p>I am extremely concerned about the Deep Nuclear Repository Site that has been proposed in Bruce County, near the shore of Lake Huron. As a property holder on the shore of Lake Huron I believe I should be entitled to be fully informed about the environmental assessment of this proposal and hereby request to receive full reports of the on-going proceedings of this Assessment and of any opportunities for input from interested stake-holders.</p>	<p>Comment does not request changes to the EIS Guidelines.</p>
<p><a href="#">100</a></p>	<p>Mukund Wankhede</p>		<p>I am providing these comments in reference to the above subject. I am deeply concerned that a nuclear waste facility will be located so close to Lake Huron that is a source of drinking water to many communities downstream.</p> <p>Michigan shares with Canada the responsibility and the fate for Lake Huron's international waters. Eastern Michigan shoreline is a mere 50 some miles from the access site for this proposed dump. Currently, local fisheries and local municipalities are listed as the only areas that could be impacted by this proposed dump. Great Lakes fisheries cannot be limited to one area, nor can waters and winds of the Great Lakes. Some storms move counter clockwise on Lake Huron. The Lake overturns twice each year, spring and fall. Great Lakes waters continuously move downstream and also evaporate to the air. Fisheries are a \$4 billion industry in the Great Lakes Basin. 40 million people get their drinking water downstream of this proposed dump. A serious accident or incident or significant leaks above or below ground at the site, could devastate Lake Huron and environs forever.</p>	<p>Comment does not request changes to the EIS Guidelines.</p>

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			<p>The proposed deep underground dump is unprecedented and permanent for all radioactive wastes. It is the first deep underground nuclear dump to be placed in sedimentary limestone and shale. So far I am not aware of any informational meetings that the Canadian Environmental Assessment Agency has conducted to educate the public in the state of Michigan that are downstream of the proposed dump site.</p>	<p>The document was revised to reflect this comment. The <i>Canadian Environmental Assessment Act</i> does not exclude public outside Canada. The EIS Guidelines require that the proponent describe public participation opportunities for non-Canadians.</p>
			<p>I have lived in St. Clair downstream of several Canadian chemical companies and have seen repeated spills occur in the St. Clair river during the 2003-2006 time frames. Having gone through that experience, it is imperative that those of us who will be downstream of this waste dump be educated and briefed about this waste dump and its environmental impact.</p>	<p>Comment does not request changes to the EIS Guidelines.</p>
<a href="#">53</a>	Michael McCarthy		<p>I've worked in the medical field as a Physician Assistant, family practice and occupational medicine for over 30 years. The gradually increasing incidences of cancer, especially in my part of Michigan, give great concern. Although the origins of the many forms of cancer are complex, and multifactor, it seems clear that new chemicals and isotopes, only arriving on the scene in the past one hundred or so years, are a serious provocation to the immune systems of human and other life forms. Until we better understand these new challenges to eons of biology, it is best not to create, and then have to store for millennia, these nuclear particles. Please find other ways to generate electricity until then.</p>	<p>No change made to the EIS Guidelines. Comment does not request changes to the EIS Guidelines.</p>
<a href="#">48</a>	Ruth Habalewsky		<p>I am a United States citizen residing in Michigan approximately 100 miles downstream from the proposed project. I have several concerns about the project including future impacts on air and water quality.</p>	<p>No change was made to the EIS Guidelines. The EIS Guidelines do require air and water quality to be controlled and monitored.</p>

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			<p>The environmental study of this unprecedented proposed deep geological repository should include Michigan and all communities in the Great Lakes basin. This project will affect a larger area than the immediate community.</p>	<p>No change made to the EIS Guidelines. Spatial boundaries can be adapted to encompass Great Lakes if it is determined that there are environmental effects.</p>
			<p>Also the panel should be made up of members entirely independent of the nuclear establishment in Canada and no members should be from the Canadian Nuclear Safety Commission. It is important to have an unbiased panel to make fair, impartial decisions.</p>	<p>The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission. The Panel will comprise independent members and not current members of the Canadian Nuclear Safety Commission.</p>
			<p>Lastly the comment period should be extended by at least 90 days to effectively inform communities in the great lakes region of this proposed repository; this project could gravely affect the great lakes. The Canadian Environmental Assessment Agency should hold informational meetings in Michigan. This project will affect a wide area, not just the Bruce area. Lake Huron Needs to be protected. Thank you for your time.</p>	<p>The document was revised to reflect this comment. The <i>Canadian Environmental Assessment Act</i> does not exclude public outside Canada. The EIS Guidelines require that the proponent describe public participation opportunities for non-Canadians.</p>
<p><a href="#">58</a></p>	<p>Laura DeVries</p>		<p>The proposal for a DUD near the great lakes seems like a very unsafe idea. Please consider other options that do not put so much at risk for so many.</p>	<p>No change. The EIS Guidelines do require alternatives to and alternative means to be examined.</p>

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<a href="#">74</a>	Environmental Consultant Provincial Council of Women of Ontario (PCWO) (Gracia Janes)		<p>Given PCWO’s over-riding use of the precautionary principle in all of our policies we strongly oppose the proposal in the Draft Joint Panel Agreement that two members of the Joint Panel be recommended by the Canadian Nuclear Safety Commission (CNSC): that CNSC should have the veto power of the Minister of Environment’s choice for the third panel member: and, that the third panel member then becomes a “temporary member” of the Commission.</p> <p>In our view it is imperative that a truly independent review panel must assess OPG’s deep geologic repository application, not the agency that is steering the proposal to its conclusion and will be regulating it should the proposal be approved. Therefore, we would request that the Joint Review Panel have three independent panel members appointed by the Minister of Environment. This would ensure that the Review Panel would be independent. The expertise of CNSC staff would then be the only link between the applicants and the Panel, which would be counter-balanced by experts of interveners to the hearing.</p>	The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission. The Panel will comprise independent members and not current members of the Canadian Nuclear Safety Commission.
<a href="#">74</a> (continued)	Environmental Consultant Provincial Council of Women of Ontario (PCWO) (Gracia Janes)		<p><b>Overview and General Comments</b></p> <p>Given that Panel hearing will be conducted and the decision made in the absence of Federal Legislation to govern the management of non-fuel radioactive waste, and as this proposal is the first one of its kind - one where the time line for review and possible approval is several years shorter and with far less public and scientific scrutiny, than that for the Nuclear Waste Management Organization’s (NWMO) proposal for high level nuclear waste — it is imperative that the Draft EIS Guidelines be particularly stringent.</p> <p>Further , the proposed deep geologic repository will contain radioactive elements that are in some cases e.g. Plutonium 239, just as long lasting as those of high-level nuclear fuel wastes, PCWO finds it unacceptable that the Guidelines fail to reflect the significance of the project . For instance, with the exception of Sections 12. Accidents and Malfunctions and 13 (13.1-13.5) Long Term Safety, the Guidelines are virtually the same as those for the OPG application for a New Build.</p>	No change made to the EIS Guidelines. The Guidelines need to be balanced to allow for both prescriptive and flexible information.

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74 (continued)	Environmental Consultant Provincial Council of Women of Ontario (PCWO) (Gracia Janes)		<p>As well, within Section 13 there are no references to specific CNSC Policy e.g. P290 Managing Radioactive Waste., and despite the guideline presumption that “Adopting a fraction of these acceptance criteria (such as dose constraints or factors of safety) for a long term assessment provides additional assurance that the uncertainty in the predictions and in future human actions would not result in unreasonable risk in the future.” (page 41), PCWO fails to be convinced that, in the absence of Federal Legislation and strong CNSC legislation, policy and regulations for non-fuel nuclear waste, such generalities will protect the public’s health and safety and the environment.</p> <p>Our unease is exacerbated by the use of weak language in the Draft Guidelines, such as “specific assessment models that will predict with reasonable confidence the long-term performance of the proposed DGR.” (Page 25) “The Proponent is required to take all reasonable precautions to protect the environment.” (Page 32) Modeling may be required (page 34); These loose terms would not be as worrisome if the Panel members for the joint review were independent from the CNSC.</p>	
			<p>Additionally, there is a consistent downplaying of the fact that the proposed repository it is for nuclear waste and the main human health, safety and environmental risk is that of radioactivity. This fault within the Guidelines (perhaps because the document is based on a template) is evidenced by the exclusion of nuclear references in many sections.</p> <p>For example, in Section 10 Existing Environment , there should be a qualifier before the word “waste” , so that the last paragraph would state “ the subsurface environment will play a dominant role in containing and isolating the {nuclear} waste from humans and the environment in the long term.”, and in Section 11.5.6 Human Health, Bullet 3 should read “ Any potential effects of air emissions associated with the Project on human receptors within the study area, such as health effects of { radio nuclides} nitrogen oxides, sulphur oxides, VOCs, carbon monoxide, dioxins/furans, metals, hydrogen chloride ....” . PCWO recommends that the wording be adjusted accordingly throughout the Guidelines.</p>	<p>No change made to the EIS Guidelines. The Guidelines require all health, safety and environmental risks be examined.</p>

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74 (continued)	Environmental Consultant Provincial Council of Women of Ontario (PCWO) (Gracia Janes)		<p><b>Concerns Regarding the Great Lakes Environment</b></p> <p>PCWO has been active over several years in a variety of consultations related to the health of the Great Lakes, such as the Great Lakes Water Quality Agreement Review and the Great Lakes Charter Annex Agreements and we are convinced that this nuclear waste repository will pose significant risks to Lake Huron, a view that is shared by many environmental groups and legislators on both sides of the US/Canada border e.g. The International Joint Commission (IJC) and Great Lakes United. (GLU). In this regard, it is notable that recently the Macomb County Water Quality Board and the Macomb County Board of Commissioners in Michigan both passed resolutions opposing any underground radioactive waste dump in the Great Lakes Region and over the past two years members of the US Congress have repeatedly spoken out against the proposed deep geologic repository i.e. as they and many others call it, a dump. PCWO shares the concerns of Macomb County and others that if there is serious accident at this site on the edge of Lake Huron, it could well put the drinking water supplies at risk in many cities, towns and villages around the lake.</p>	<p>No change to the EIS Guidelines. Comment does not request changes to the EIS Guidelines.</p>
			<p><b>Geological Risks</b></p> <p>Such an occurrence may appear to be a very unlikely; however the location of the proposed repository in an Ordovician sedimentary formation increases the risk. For instance, in a study done for NWMO Characterizing the Geosphere in High Level Radioactive Waste Management independent geologists, Professor J.F. Sykes of the University of Waterloo notes that "Beneath the Bruce Nuclear Power Development on Lake Huron, the Ordovician shales of the Michigan Basin are likely to have hydraulic conductivities in the range of 10 to the 11th to 10 to the 14th m/s at depths of 500m (Moltyaner et al 1995),. The pore water in the formation is highly saline and stagnant.</p> <p>However, the physical properties of shale can undergo significant irreversible alteration with low or moderate changes in temperature, or stress." An additional caution is the location of the Bruce site on the Findlay-Algonquin Arch, along which there are active</p>	<p>No change made to the EIS Guidelines. The Guidelines adequate outline the expectations with respect to the geological risks of the proposed project.</p>

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74 (continued)	Environmental Consultant Provincial Council of Women of Ontario (PCWO) (Gracia Janes)		<p>faults.</p> <p>PCWO recognizes that the EIS will require a quite detailed description and analysis of the “geotechnical and geophysical hazards; however PCWO recommends that the Guidelines should specifically require the Joint Panel to use independent, third party evidence as to the stability of the Ordovician sedimentary and the earthquake potential. Only in this way may the Panel be certain that the underground repository for nuclear waste in this area does not pose a risk to this very special ecological area and a Great Lake that is in close proximity to and supplies fresh drinking water to millions of residents on both sides of the border. This is not an unreasonable requirement, given the huge ramifications of any “significant irreversible alteration” or an earthquake.</p>	
			<p><b>Limitation of Spatial Boundaries</b></p> <p>An often neglected aspect of specific nuclear proposals is the limitation of an EA to a very confined area. In this case, there is an assumption that the various outflows from the nuclear repository will be confined to the “lands, communities and portions of Lake Huron around the Bruce Nuclear site that may be relevant to the assessment of any wider spread effects of the project”. This limitation might have been appropriate in an age when communities were small and knowledge of the Great Lakes and air and water shed inter-connectivity more limited. However, it is obvious now, that pollution from far south in the Ohio Valley travels into a large part of southern Ontario and dioxin from industrial emissions in southern Ontario are found in the Arctic. It is clear that radioactive releases into air and water will have a trans-boundary impact far outside the current spatial boundary. PCWO considers it imperative that these factors be recognized in the Draft Guidelines for this proposed EIS through an enlargement of the Spatial Boundaries to include at the very least the whole of Lake Huron and environs, the transportation routes for waste traveling from other nuclear plants, and the potential for a study expansion to include trans-boundary and other end-point- of- impact locations, should evidence warrant this.</p>	<p>No change made to the EIS Guidelines. Spatial boundaries can be adapted to encompass the Great Lakes if it is determined that there are environmental effects.</p>

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<a href="#">74</a> (continued)	Environmental Consultant Provincial Council of Women of Ontario (PCWO) (Gracia Janes)	9.1	<p><b>Lack of Emphasis on the Very Long Term Nature of Some of the Buried Materials</b></p> <p>It is notable that some of the radio isotopes to be contained in the deep geologic repository are just as long lasting as those from the high level nuclear fuel wastes that are to be eventually buried in NWMO’s planned deep geologic repository, and yet there is little in the Draft Guidelines to reflect this.</p> <p>For instance, although in section 9.2 Temporal Boundaries, it states “The approach taken to determine the temporal boundary assessment should take into account the following elements: the hazardous lifetime of the contaminants associated with the waste...” this is a generic reference, obviously taken from a template and not specifically referencing the extremely long period needed for this proposal. Elsewhere, some references contain the implicit presumption that the follow up will be of a short term duration e.g. in section 16, follow-up program “....a specific statement from the environmental assessment that goes along with the generic objective and will be the focus of the activity (e.g. program objective: verify predicted effects; environmental assessment effect: no adverse effects in the population level for white tailed deer because of vehicle strikes due to increased traffic within the site area)...”. This example also very much under-plays the nature and longevity of the risks and dangers to the public and natural life should there be a containment failure.</p> <p>As this is a very special proposal, one that in comparison with NWMO’s plan for a deep geologic nuclear repository has had a minimal amount of pre-planning before moving to an EA, PCWO recommends that at the very least there should be changes to the Draft EIS Guidelines to ensure that the proponent’s time lines and plans for all contingencies reflect the extremely long life of some radionuclides.</p>	No change made to the EIS Guidelines. Contingency plans are discussed in the EIS Guidelines.
<a href="#">360</a>	City of Marine City (City Clerk)		Copy of resolution 032-08 passed by Marine City, Michigan opposing DGR project or the construction of any underground repository in the Great Lakes Basin, Canada, US, or any First Nation property.	Not a comment on the EIS Guidelines. No change was made to the Guidelines.

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<p><a href="#">96</a></p> <p><a href="#">96</a> (continued)</p>	<p>Citizens for Renewable Energy (CFRE) (Ziggy Kleinau)</p> <p>Citizens for Renewable Energy (CFRE) (Ziggy Kleinau)</p>		<p>Following up on a briefing by officials from the Nuclear Waste Management Organization (NWMO) on the Deep Geological Repository project (DGR), proposed by the Ontario Power Generation (OPG), Ontario's public utility, we need to submit the following comments and concerns on behalf of the members and directors of Citizens For Renewable Energy (CFRE):</p> <p>NWMO is a federally legislated organization under the Mandate of the Nuclear Fuel Waste Act to search for a solution for the thousands of tonnes of lethal highly radioactive waste only. Challenged on their involvement in a project to oversee the management of low- and intermediate level radioactive waste to be disposed of in deep underground caverns we were told that they were contracted to manage the regulatory part of the project for OPG.</p> <p>We want to express our strong opposition to this arrangement as we see an obvious attempt to combine the two different categories under one project.</p> <p>We are well aware of the siting of this dangerous project as we have been participants in the first stage of the Independent Panel Environmental Assessment legislated by the Minister of the Environment.</p> <p>Just barely over one kilometre from the shore of one of the Great Lakes, Lake Huron, on an outcrop already harbouring the 8 reactors of the Bruce Nuclear Power Development and also the largest nuclear waste facility on the Continent, those two projected 680 metre deep caverns will severely contribute to the instability of this small piece of land surrounded on three sides by water.</p> <p>We are not comforted by assurances that the drilling core samples show a stable rock formation of low permeability sedimentary limestone which would be complimented by multiple natural barriers.</p> <p>It is the planned human activity of drilling and blasting to open up these huge shafts that will disturb a formation that has been stable for thousands of years. It also is the first time that a project of this magnitude for long-lived intermediate level waste is being</p>	<p>No change to the EIS Guidelines. These comments do not request changes to the EIS Guidelines.</p>

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			projected in a limestone formation.	
96 (continued)	Citizens for Renewable Energy (CFRE) (Ziggy Kleinau)		<p>There is no guarantee that surface water can be kept out and groundwater seepage be prevented. Water and irradiated waste is a dangerous combination.</p> <p>The comparison with already existing depositories internationally in hard crystalline rock does not match with this project in layered rock. Two so-called safe depositories in Germany for similar wastes have turned out structurally dangerous and there is no proven concept on how to retrieve those thousands of containers to safeguard people and the environment there.</p>	No change was made to the EIS Guidelines. The EIS Guidelines do require that the environmental effects of the biophysical environment be examined.
			<p>Since the advent of serious disturbances in many parts of the world via Climate Change there is no way the long term safe containment of these deadly substances can be guaranteed.</p> <p>The only way to manage these wastes is to contain it as safely as at all possible above ground, discontinue any refurbishment projects and phase out the operation of nuclear power generators at an accelerated rate.</p> <p>CFRE wants to be acknowledged as being strongly opposed to the execution of this proposed project.</p>	No change. Not a comment on the EIS Guidelines.
69	Ron Mattmer (revised submission)		Expressed serious reservations over the panel “being stacked by the CNSC”; these proceedings presided over by the CNSC should be cause for concern to the Minister of the Environment.	
			Requests to be added to Stakeholder List.	Not a comment on the EIS Guidelines.
			Expressed view that current waste management activities are to be included in the evaluation of the DGR proposal vs. other alternatives. Social and economic factors are to	No change made to the EIS Guidelines. The EIS Guidelines

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69 (continued)	Ron Mattmer (revised submission)		be included in the assessment.	require waste management and social and economic factors be examined.
			Expressed view that the relative merits of the various options or combination of options for volume reduction should be evaluated. (I.e. incineration or super-compaction).	No change to the EIS Guidelines. The EIS Guidelines do require that the proponent discuss alternative means including reduction at the source.
			International approaches for segregation of waste and packaging are to be assessed. Requirements for waste packages, e.g. activity limits for specific nuclides, are to be determined.	The EIS Guidelines were revised to reflect this comment.
			The study should determine if the management of long lived IL waste is to be coordinated with disposal of HL Waste.  Before deciding on any proposal that will cost future generations close to \$1billion, we should determine the best option for managing the various LL & IL waste streams, long lived waste and wastes from ALL producers incl. AECL, hospitals, etc. A comprehensive study and consultation similar to that completed by the NWMO for HL waste should be completed for LL and IL waste. Options for management should be evaluated.	No change was made to the EIS Guidelines. The scope of the project is only for low- and intermediate-level waste.
			Alternative site locations are to be considered. The rationale for locating the DGR at the Bruce site vs. another location should be provided.	The EIS Guidelines were revised to reflect this comment.
			Additional information on international experience with DGR’s is to be provided.	No change. Not a comment on the EIS Guidelines.
			The CNSC and their licensees are of the opinion that as long as unplanned releases are a fraction of the regulatory limit, the public are safe, i.e., not exposed to unreasonable risk and therefore the illegal dumping of radioactive waste in Canada is deemed to be a	No change to the EIS Guidelines. The EIS Guidelines require radiation and

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			<p>reasonable activity. These transgressions are not the result of some operator error. They are by policy and a reflection of the prevailing culture of the nuclear industry and the regulator.</p> <p>The EIS is to provide an objective review of the contradictory science that supports the “safe” levels of exposure to ionizing radiation:</p>	<p>radioactivity to be examined.</p>
			<p>To determine if the site could contain and isolate the waste from humans and the environment in the long term, more data on the site geology is required.</p>	<p>No change made, the EIS Guidelines require the proponent to describe the geology and structural geology of the proposed site.</p>
			<p>Criteria used to exclude or include natural events and accidents scenarios should be documented.</p> <p>The assessment is to cover the timeframe over which the DGR poses a potential risk considering the hazardous lifetime of the waste; the frequency of seismic occurrences, floods, droughts, glaciations, climate change, etc.</p>	<p>No change made to the EIS Guidelines. The Guidelines require that the proponent describe accident scenarios that have a reasonable probability of occurring and an explanation of how these events were identified. Further, the EIS Guidelines require that the assessment consider severe weather conditions and external events (flooding, tornado, fire and seismic events) that could effect the project. The proponent must also discuss longer term effects of climate change.</p>
			<p>Given the possibility of leakage into the Great Lakes over the next 500,000 years, the study area should be expanded to include downstream communities on the American sides of Lakes Huron, Erie and Ontario and the St. Clair and St. Lawrence Rivers.</p>	<p>No change was made to the EIS Guidelines. Spatial boundaries can be adapted to encompass Great Lakes if it is determined that there are</p>

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				environmental effects.
			The assessment should provide a rationale for the determination of the time frame to be covered by the assessment.	No change was made to the EIS Guidelines. The Guidelines require a timeline for all phases of the proposed project. Further, the EIS Guidelines require that the proponent consider the hazardous lifetime of the contaminants associated with the proposed project.
			Plans for waste retrieval post-closure are to be assessed for the drafting of the EIS.	The document has been revised to reflect this comment.
			Details of a program to monitor for release of contaminants from the repository into Lake Huron post closure are required to support the EIS.	No change to the EIS Guidelines. The proponent must describe a follow-up program that will be used to verify the accuracy of the environmental assessment and determine the effectiveness of the measures implemented to mitigate the adverse environmental effects of the project. The proponent must propose a schedule for the follow-up program.

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			The hosting agreement, between OPG and surrounding municipalities which pays the municipalities \$35 million, prejudices the completion of an ethical and principled assessment under the CEAA.	No change. Not a comment on the EIS Guidelines.
<a href="#">87</a>	Ron Mattmer (additional submission)		<b>Joint Panel Review Agreement</b> Request clarification as to why NRCan was not identified as a responsible authority and party to the agreement.	No change made to the EIS Guidelines. Natural Resources Canada (NRCan) was identified as a federal authority.
			As per section 5.1 d, since when is it the CNSC’s mandate to make policy and co-ordinate overall planning for the disposal of Canada’s low level and intermediate level waste?	No change. Not a comment on the EIS Guidelines.
			Request clarification as to why CNSC will determine the relevance of social, economic, cultural and ethical considerations, section 16 factors "	No change made to the EIS Guidelines. Section 16 factors are a requirement of the <i>Canadian Environmental Assessment Act</i> .
			Request clarification as to why NRCan has not assumed its duties and functions. “It is up to NRCan to ensure these considerations get addressed in policy and planning.	Not a comment on the EIS Guidelines.
<a href="#">109</a>	Phillip Penna		To fulfill the purpose and provisions of the <i>Canadian Environmental Assessment Act</i> and to meet the expectations of Canadians, the review panels appointed for the environmental assessment of the Bruce Power New Build and Ontario Power Generation’s Deep Geologic Repository for Radioactive Wastes must be independent, objective and impartial, and must also be perceived as such. In contrast to what is	The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission. The Panel will

CEAA Document Number	Name	Section	Comment	Response
			<p>currently outlined in the draft Joint Panel Review Agreement:</p> <ul style="list-style-type: none"> <li>▪ all members should be appointed by the Minister of the Environment</li> <li>▪ if, despite the good reasons for all members being appointed by the Minister of the Environment, some members are appointed by the Canadian Nuclear Safety Commission, the CNSC appointees should form a minority of panel members</li> <li>▪ the Chair of the Panel should be appointed by the Minister of the Environment</li> <li>▪ the Environmental Assessment Process should be independent of the licensing process and vice versa; therefore, the EA panel should not act as the Commission for the purpose of issuing the first license. If an EA approval is granted, the licensing decisions should be made by the full Commission, as per standard practice</li> </ul>	<p>comprise independent members and not current members of the Canadian Nuclear Safety Commission.</p>
			<p>To fulfill the purpose and provisions of the <i>Canadian Environmental Assessment Act</i> and to meet the expectations of Canadians, the guidelines for the Environmental Impact Statement should direct the proponent to provide a full discussion of the need for the project, alternative means of meeting that need, alternative means of carrying out the undertaking, and the cumulative effects of the project.</p>	<p>No change to the EIS Guidelines. The EIS Guidelines require that the proponent describe the need for the project, alternative means of carrying out the project and cumulative effects of the project.</p>
			<p>The EIS guidelines for the environmental assessment of the Bruce Power New Build and the Deep Geological Repository should direct the proponents to provide:</p> <ul style="list-style-type: none"> <li>▪ a full discussion of environmental impacts on all parts of the environment, including humans, rather than limiting it to the short list of species listed as “valued ecosystem components” in the draft EIS guidelines</li> </ul>	<p>The document was revised to reflect this comment. The proponent is required to modify the list of valued ecosystem components (VECs) as appropriate following consultations with the public, Aboriginal people, federal and provincial government departments and relevant stakeholders, including comments received by the Canadian Environmental Assessment</p>

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				Agency and the Canadian Nuclear Safety Commission during the public comment period for the EIS Guidelines (April 4 to June 18, 2008).
			<ul style="list-style-type: none"> <li>▪ a discussion of radiation and radioactivity that is broader than the natural and background sources at the Bruce station, i.e. the discussion should be at least the Great Lakes watershed</li> </ul>	The EIS Guidelines outlines geographic studies that should serve as the basis for developing project-specific and effect-specific study areas.
			<ul style="list-style-type: none"> <li>▪ a discussion of Aboriginal communities which includes at least the communities in the Lake Huron watershed</li> </ul>	No change. The EIS Guidelines do not preclude consideration of any impacted Aboriginal community.
			<p>The EIS guidelines for the environmental assessment of the Deep Geologic Repository for Radioactive Wastes should direct Ontario Power Generation to provide:</p> <ul style="list-style-type: none"> <li>▪ a discussion of transport of the waste to the Bruce Generating Station; the transportation of waste to the Bruce Generating Station is part of the project, and must be addressed as such</li> </ul>	No change made to the EIS Guidelines. Transportation of low and intermediate level waste is not within the scope of the DGR project as the waste would continue to be at the Western Waste Management Facility at the Bruce Power nuclear site.
			<ul style="list-style-type: none"> <li>▪ a full discussion of why the Intermediate Level Waste is being managed with the Low Level Waste instead of with the high level waste, and a description of how OPG made those decisions with respect to this project</li> </ul>	No change. The EIS Guidelines require that the proponent clearly describe the need for the proposed project.
			<ul style="list-style-type: none"> <li>▪ a full discussion of failure criteria, contingency planning, and the relationship between the failure criteria and decisions to implement contingency plans, including</li> </ul>	The document was revised to reflect this comment. The EIS Guidelines

CEAA Document Number	Name	Section	Comment	Response
			waste retrieval	requires that the proponent describe any contingency, clean-up or restoration work in the surrounding environment that would be required during or immediately following postulated malfunctions and accidents.
			<ul style="list-style-type: none"> <li>▪ a full discussion of wastes to be generated through decommissioning and refurbishment of OPG and Bruce Power reactors</li> </ul>	No change to the EIS Guidelines, this is outside the scope of the proposed project.
			<ul style="list-style-type: none"> <li>▪ volume estimates that include various scenarios, including re-builds, new builds, life extensions, and phase out at various time frames</li> </ul>	No change to the EIS Guidelines, this is outside the scope of the proposed project.
			Please add me to your distribution list and keep me informed of future opportunities to participate in these important reviews	Not a comment on the EIS Guidelines.
95	David B Trowbridge		<p>To fulfill the purpose and provisions of the <i>Canadian Environmental Assessment Act</i> and to meet the expectations of Canadians, the review panels appointed for the environmental assessment of the Bruce Power New Build and Ontario Power Generation’s Deep Geologic Repository for Radioactive Wastes must be independent, objective and impartial, and must also be perceived as such. In contrast to what is currently outlined in the draft Joint Panel Review Agreement:</p> <ul style="list-style-type: none"> <li>▪ all members should be appointed by the Minister of the Environment</li> <li>▪ if, despite the good reasons for all members being appointed by the Minister of the Environment, some members are appointed by the Canadian Nuclear Safety Commission, the CNSC appointees should form a minority of panel members</li> </ul>	See response to comment #109.

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			<ul style="list-style-type: none"> <li>▪ the Chair of the Panel should be appointed by the Minister of the Environment</li> <li>▪ the Environmental Assessment Process should be independent of the licensing process and vice versa; therefore, the EA panel should not act as the Commission for the purpose of issuing the first license. If an EA approval is granted, the licensing decisions should be made by the full Commission, as per standard practice</li> </ul> <p>To fulfill the purpose and provisions of the <i>Canadian Environmental Assessment Act</i> and to meet the expectations of Canadians, the guidelines for the Environmental Impact Statement should direct the proponent to provide a full discussion of the need for the project, alternative means of meeting that need, alternative means of carrying out the undertaking, and the cumulative effects of the project.</p> <p>The EIS guidelines for the environmental assessment of the Bruce Power New Build and the Deep Geological Repository should direct the proponents to provide:</p> <ul style="list-style-type: none"> <li>▪ a full discussion of environmental impacts on all parts of the environment, including humans, rather than limiting it to the short list of species listed as “valued ecosystem components” in the draft EIS guidelines</li> <li>▪ a discussion of radiation and radioactivity that is broader than the natural and background sources at the Bruce station, i.e. the discussion should be at least the Great Lakes watershed</li> <li>▪ a discussion of Aboriginal communities which includes at least the communities in the Lake Huron watershed</li> </ul> <p>The EIS guidelines for the environmental assessment of the Deep Geologic Repository for Radioactive Wastes should direct Ontario Power Generation to provide:</p> <ul style="list-style-type: none"> <li>▪ a discussion of transport of the waste to the Bruce Generating Station; the transportation of waste to the Bruce Generating Station is part of the project, and must be addressed as such</li> <li>▪ a full discussion of why the Intermediate Level Waste is being managed with the</li> </ul>	

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			<p>Low Level Waste instead of with the high level waste, and a description of how OPG made those decisions with respect to this project</p> <ul style="list-style-type: none"> <li>▪ a full discussion of failure criteria, contingency planning, and the relationship between the failure criteria and decisions to implement contingency plans, including waste retrieval</li> <li>▪ a full discussion of wastes to be generated through decommissioning and refurbishment of OPG and Bruce Power reactors</li> <li>▪ volume estimates that include various scenarios, including re-builds, new builds, life extensions, and phase-out at various time frames</li> </ul> <p>Please add me to your distribution list and keep me informed of future opportunities to participate in these important reviews.</p>	
<p><a href="#">108</a></p>	<p>Dorothy Goldin Rosenberg MES, PhD. (University of Toronto Lecturer)</p>		<p>To fulfill the purpose and provisions of the <i>Canadian Environmental Assessment Act</i> and to meet the expectations of Canadians, the review panels appointed for the environmental assessment of the Bruce Power New Build and Ontario Power Generation’s Deep Geologic Repository for Radioactive Wastes must be independent, objective and impartial, and must also be perceived as such. In contrast to what is currently outlined in the draft Joint Panel Review Agreement:</p> <ul style="list-style-type: none"> <li>▪ all members should be appointed by the Minister of the Environment</li> <li>▪ if, despite the good reasons for all members being appointed by the Minister of the Environment, some members are appointed by the Canadian Nuclear Safety Commission, the CNSC appointees should form a minority of panel members</li> <li>▪ the Chair of the Panel should be appointed by the Minister of the Environment</li> <li>▪ the Environmental Assessment Process should be independent of the licensing process and vice versa; therefore, the EA panel should not act as the Commission for the purpose of issuing the first license. If an EA approval is granted, the licensing</li> </ul>	<p>See response to CEAR #109.</p>

CEAA Document Number	Name	Section	Comment	Response
			<p>decisions should be made by the full Commission, as per standard practice</p> <p>To fulfill the purpose and provisions of the <i>Canadian Environmental Assessment Act</i> and to meet the expectations of Canadians, the guidelines for the Environmental Impact Statement should direct the proponent to provide a full discussion of the need for the project, alternative means of meeting that need, alternative means of carrying out the undertaking, and the cumulative effects of the project.</p> <p>The EIS guidelines for the environmental assessment of the Bruce Power New Build and the Deep Geological Repository should direct the proponents to provide:</p> <ul style="list-style-type: none"> <li>▪ a full discussion of environmental impacts on all parts of the environment, including humans, rather than limiting it to the short list of species listed as "valued ecosystem components" in the draft EIS guidelines</li> <li>▪ a discussion of radiation and radioactivity that is broader than the natural and background sources at the Bruce station, i.e. the discussion should be at least the Great Lakes watershed</li> <li>▪ a discussion of Aboriginal communities which includes at least the communities in the Lake Huron watershed</li> </ul> <p>The EIS guidelines for the environmental assessment of the Deep Geologic Repository for Radioactive Wastes should direct Ontario Power Generation to provide:</p> <ul style="list-style-type: none"> <li>▪ a discussion of transport of the waste to the Bruce Generating Station; the transportation of waste to the Bruce Generating Station is part of the project, and must be addressed as such</li> <li>▪ a full discussion of why the Intermediate Level Waste is being managed with the Low Level Waste instead of with the high level waste, and a description of how OPG made those decisions with respect to this project</li> <li>▪ a full discussion of failure criteria, contingency planning, and the relationship between the failure criteria and decisions to implement contingency plans, including</li> </ul>	

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			<p>waste retrieval</p> <ul style="list-style-type: none"> <li>▪ a full discussion of wastes to be generated through decommissioning and refurbishment of OPG and Bruce Power reactors</li> <li>▪ volume estimates that include various scenarios, including re-builds, new builds, life extensions, and phase-out at various time frames</li> </ul> <p>Please add me to your distribution list and keep me informed of future opportunities to participate in these important reviews.</p>	
<a href="#">32</a>	Sharron Meldrum		I strongly feel that an objective assessment of the risks involved with this project should be free from the influence of the pro-nuclear establishment. The idea of sitting a nuclear waste dump next to our drinking water is a disaster waiting to happen.	Not a comment on the EIS Guidelines.
<a href="#">30</a>	Margret Trojand		<p>I am only one voice but I believe in working together for the greater good.</p> <p>I became aware of this proposal for nuclear waste storage this morning on a radio show. I am voicing my concern on the lack of transparency and the fact that it was on a local Michigan radio station that carried the story and not our local media.</p> <p>I, for one am not comfortable with the proposal to bury this waste material on the shores of our shared great lakes. The price is too high and can't be compared with the cost of moving this waste to an area that could in no possible way effect our fresh water reserves.</p> <p>Thank you for your time and for the sake of my beautiful Grandson, please leave the lakes alone.</p>	Not a comment on the EIS Guidelines.

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e-DOC 3868526 <a href="#">76</a> and	Emily Weber		<p>To fulfill the purpose and provisions of the <i>Canadian Environmental Assessment Act</i> and to meet the expectations of Canadians, the review panels appointed for the environmental assessment of the Bruce Power New Build and Ontario Power Generation’s Deep Geologic Repository for Radioactive Wastes must be independent, objective and impartial, and must also be perceived as such. In contrast to what is currently outlined in the draft Joint Panel Review Agreement:</p> <ul style="list-style-type: none"> <li>▪ all members should be appointed by the Minister of the Environment</li> <li>▪ if, despite the good reasons for all members being appointed by the Minister of the Environment, some members are appointed by the Canadian Nuclear Safety Commission, the CNSC appointees should form a minority of panel members</li> <li>▪ the Chair of the Panel should be appointed by the Minister of the Environment</li> <li>▪ the Environmental Assessment Process should be independent of the licensing process and vice versa; therefore, the EA panel should not act as the Commission for the purpose of issuing the first license. If an EA approval is granted, the licensing decisions should be made by the full Commission, as per standard practice</li> </ul> <p>To fulfill the purpose and provisions of the <i>Canadian Environmental Assessment Act</i> and to meet the expectations of Canadians, the guidelines for the Environmental Impact Statement should direct the proponent to provide a full discussion of the need for the project, alternative means of meeting that need, alternative means of carrying out the undertaking, and the cumulative effects of the project.</p> <p>The EIS guidelines for the environmental assessment of the Bruce Power New Build and the Deep Geological Repository should direct the proponents to provide:</p> <ul style="list-style-type: none"> <li>▪ a full discussion of environmental impacts on all parts of the environment, including humans, rather than limiting it to the short list of species listed as “valued ecosystem components” in the draft EIS guidelines</li> <li>▪ a discussion of radiation and radioactivity that is broader than the natural and background sources at the Bruce station, i.e. the discussion should be at least the Great Lakes watershed</li> <li>▪ a discussion of Aboriginal communities which includes at least the communities in the Lake Huron watershed</li> </ul> <p>The EIS guidelines for the environmental assessment of the Bruce Power New Build</p>	See response to CEAR #109.

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<a href="#">130</a>	Barbara Jack		I wish to express my profound objection to the establishment of a radioactive nuclear waste dump near the shore of Lake Huron. The risk of leakage into the Great Lakes water system is far too high and could contaminate water supplies for millions of people on both sides of the Canada-US border for generations to come.	No change. Not a comment on the EIS Guidelines.
<a href="#">89</a>	Diane Meyer		I am first expressing my general concern that a nuclear power station would be located in the heart of the Great Lakes. The safety issue outweighs all others. There is no such thing as a 100% safe facility.	Not a comment on the EIS Guidelines.
			This is radioactive material we are talking about, not accidental release of a gas or polluting toxins. Although it is claimed the underground storage would be for only low and intermediate nuclear waste, it is uncertain whether this would be revised to accept high level waste. To concentrate so many nuclear reactors in one site and add storage of nuclear waste on the same site is to me grossly misguided and shows a complete lack of common sense. Radioactive waste is active for 150,000 years, not for 300 years. Radioactive material is readily dispersed in water. It is proposed to produce and store radioactive waste on this site, bring in more waste from other sites, making it the largest nuclear facility in the world. All on the shore of Lake Huron in the heart of the Great Lakes which is the largest source of freshwater adjoining Canada and the US, unlike any other water source on the continent. This is unacceptable. All the scientific studies will never assure that there will not be potential major weather or seismic events in the next 150,000 years.	Comment does not request changes to the EIS Guidelines.
			The life of these nuclear reactors is expected to be 60 years, although other reactors with a life expectancy of 40 years have had to be shut down in 20 years. Even if they functioned for 60 years before having to be refurbished, the risks of contaminating the water and effecting the health of millions of people for years to come, as well as future generations, makes this a foolish risk and a poor financial investment.	Not a comment on the EIS Guidelines.

CEAA Document Number	Name	Section	Comment	Response
<a href="#">89</a> (continued)	Diane Meyer		<p>Given the associated risks, it makes the most sense to use these financial resources to develop alternative sources of energy which can go a long way to meet the needs of the people. Efforts to evaluate commercial and residential uses and education to promote conservation should be the first step. Demand can be reduced. I look around and see so much waste of energy at a time when we are in energy crises.</p> <p>We already have examples of successful alternatives such as the wind farm in Sault Ste. Marie, Ontario. Locations where wind farms and solar applications would be successful can be identified. These are safe applications. As we work on conservation and use of alternatives, more efforts can be made to develop innovative technologies to provide energy needs. We have come a long way since the invention of the automobile and the airplane in the last 100 years. Amazing processes are being developed. We have time to focus on breakthroughs that will make nuclear energy unnecessary. If a method of using nuclear energy were to be developed that eliminated nuclear waste then we would have something. Until that day comes, it is immoral to propose this expansion. The facility which already exists is itself a threat. All it takes is one accident.</p>	Not a comment on the EIS Guidelines.
<a href="#">89</a> (continued)			<p>I am a resident of Sault Ste. Marie, Michigan. I consider Canadians to be my neighbours and friends. It is unacceptable to me that your government would place these facilities on Lake Huron which is shared by United States citizens. There are so many threats to health and well being, we do not need another one. We are all faced with many challenges today. Climate change is showing us daily that we have a lot of work to do to try to protect ourselves. Ecosystems are in trouble, plant disease, invasive species, honey bee colonies collapsing, species going extinct, etc. etc. We have to face the fact that our methods of doing things must change. Adding more nuclear risks is not the way to do it. The public does not support this.</p> <p>Give us innovative leadership and not more of the same insanity.</p>	Comment does not request changes to the EIS Guidelines.
			I am also questioning the adequacy of the EIS and the Review Panel.	The Joint Review Panel will be an independent panel appointed by the

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	Diane Meyer		<p>I see that two members from the CNSC will be on the proposed Joint Review Panel. It must be stressed that the panel be unbiased, independent and neutral. Members of the panel must be just as capable of deciding a No as a Yes for the project. The panel should be sequestered during the process of making their decision.</p> <p>Also there should be more than three people on the panel to make this exceptionally important decision. I have recently learned that Nuclear Waste Management Org. is taking over management of Ontario Power. There is something wrong here.</p>	<p>Minister of the Environment and the President of the Canadian Nuclear Safety Commission. The Panel will comprise independent members and not members of the Canadian Nuclear Safety Commission.</p>
			<p>The EIS which Bruce Power proposes would not consider the differences in potential for accidents and malfunctions among the three plant types being considered for construction The CNSC's independence and authority has recently been brought into question in regard to the operation of the NRU reactor at Chalk River.</p> <p>Why are quantitative safety goals for newly proposed nuclear power plants weaker than safety goals previously set by CNSC? Again questions are raised about their independence.</p> <p>A "technology neutral" assessment of the potential for accidents proposed by Bruce Power would not be credible.</p> <p>The EIS should assess potential for diversion of fissile or radioactive material for illicit use and potential environmental impacts.</p>	<p>No change to the EIS Guidelines. Comment does not reference the proposed DGR project.</p>
			<p>To fulfill the purpose and provisions of the <i>Canadian Environmental Assessment Act</i> and</p>	<p>See response to CEAR #109.</p>

CEAA Document Number	Name	Section	Comment	Response
<a href="#">89</a> (continued)	Diane Meyer		<p>to meet the expectations of Canadians, the review panels appointed for the environmental assessment of the Bruce Power New Build and Ontario Power Generations’ Deep Geologic Repository for Radioactive Wastes must be independent, objective and impartial, and must also be perceived as such. In contrast to what is currently outlined in the draft Joint Panel Review Agreement:</p> <ul style="list-style-type: none"> <li>▪ all members should be appointed by the Minister of the Environment</li> <li>▪ if, despite the good reasons for all members being appointed by the Minister of the Environment, some members are appointed by the Canadian Nuclear Safety Commission, the CNSC appointees should form a minority of panel members</li> <li>▪ the Chair of the Panel should be appointed by the Minister of the Environment</li> <li>▪ the Environmental Assessment Process should be independent of the licensing process and vice versa; therefore, the EA panel should not act as the Commission for the purpose of issuing the first license. If an EA approval is granted, the licensing decisions should be made by the full Commission, as per standard practice</li> </ul> <p>To fulfill the purpose and provisions of the <i>Canadian Environmental Assessment Act</i> and to meet the expectations of Canadians, the guidelines for the Environmental Impact Statement should direct the proponent to provide a full discussion of the need for the project, alternative means of meeting that need, alternative means of carrying out the undertaking, and the cumulative effects of the project.</p> <p>The EIS guidelines for the environmental assessment of the Bruce Power New Build and the Deep Geological Repository should direct the proponents to provide:</p> <ul style="list-style-type: none"> <li>▪ a full discussion of environmental impacts on all parts of the environment, including humans, rather than limiting it to the short list of species listed as “valued ecosystem components” in the draft EIS guidelines</li> <li>▪ a discussion of radiation and radioactivity that is broader than the natural and background sources at the Bruce station, i.e. the discussion should be at least the</li> </ul>	

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<a href="#">89</a> (continued)	Diane Meyer		<p>Great Lakes watershed</p> <ul style="list-style-type: none"> <li>▪ a discussion of Aboriginal communities which includes at least the communities in the Lake Huron watershed</li> </ul> <p>The EIS guidelines for the environmental assessment of the Deep Geologic Repository for Radioactive Wastes should direct Ontario Power Generation to provide:</p> <ul style="list-style-type: none"> <li>▪ a discussion of transport of the waste to the Bruce Generating Station; the transportation of waste to the Bruce Generating Station is part of the project, and must be addressed as such</li> <li>▪ a full discussion of why the Intermediate Level Waste is being managed with the Low Level Waste instead of with the high level waste, and a description of how OPG made those decisions with respect to this project</li> <li>▪ a full discussion of failure criteria, contingency planning, and the relationship between the failure criteria and decisions to implement contingency plans, including waste retrieval</li> <li>▪ a full discussion of wastes to be generated through decommissioning and refurbishment of OPG and Bruce Power reactors</li> <li>▪ volume estimates that include various scenarios, including re-builds, new builds, life extensions, and phase-out at various time frames</li> </ul> <p>Please add me to your distribution list and keep me informed of future opportunities to participate in these important reviews.</p>	
<a href="#">88</a>	Carl Meyer		<p>Your proposals have not addressed the kinds of changes that take place in radioactive material after the first phase of its half-life. It changes into other forms, some of which are even more volatile.</p> <p>Regarding storage of low and intermediate nuclear waste, it would not take much movement of the earth to allow leakage and release of stored material into the earth and</p>	No change. Comments do not request changes to the EIS Guidelines.

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			<p>groundwater which would be a monumental disaster.</p> <p>The actual cost of producing electricity has not been accurately taken into account. Stated costs do not include other factors such as cost of production of the radio active material.</p> <p>There is not enough radioactive material available for use much beyond 80 years. Eighty years is a very short-term solution for energy needs. What would the plan be after that? We must find alternatives now instead of later. Safer technologies are available and can be improved with research and development without risk to humans and other species.</p> <p>Expanding the existing facilities on the shore of Lake Huron is ill-advised. The risks are unacceptable.</p>	
52	Mark Muller		<p>To carry on as if all possible accidental factors can be allowed for and prevented is demonstrably delusional.</p> <p>Especially in this area of science and engineering where historical evidence has already proven the opposite on any number of occasions.</p> <p>What we are witnessing is the typical denial stage which accompanies the emergence of any mental illness before diagnosis is confirmed and treatment is successful.</p> <p>This treatment itself is entirely dependant on recognition of the diagnosis by both Doctor (human society) and patient (the Nuclear Industry and its proponents).</p> <p>In cases where a patient will not consent to treatment, Ontario law demands that society demonstrate that the patient is a danger either to itself or to society.</p> <p>Society need only demonstrate real danger to one person, not dozens, hundreds or hundreds of thousands.</p> <p>To summarize:</p> <p>The realities of the incalculable dangers posed by even a minute mistake in the</p>	<p>No change to the EIS Guidelines. Comments do not request changes to the EIS Guidelines.</p>

CEAA Document Number	Name	Section	Comment	Response
			<p>technologies surrounding unclean, unsafe and unbelievably expensive nuclear power are too horrifying to imagine.</p> <p>For the Nuclear Industry, it's Executive Officers or any government officials to separate their thought processes from this reality and thus endanger the normal social functioning of a society, either through actual physical harm, threat of harm or by creating fear of harm is, by definition....deranged</p>	
<a href="#">54</a>	Dan Rudka		<p>I am against this proposed nuclear waste site. It obviously is a great threat to our lakes and people.</p> <p>Port Hope, Ontario is an example of the pollution, poor health, and social disaster that will envelope this effort.</p> <p>Presently, Cameco in Port Hope has discovered a very large and dangerous plume of radioactive and other poisons, that has reached Lake Ontario and threatens the water source of Canadians and Americans.</p> <p>Such a situation in Port Hope "should" be example to the threat of this new proposal!</p>	No change made to the EIS Guidelines. Not a comment on the Guidelines.
<a href="#">49</a>	Theodora Carroll		I oppose the creation and establishment of radioactive waste dumps in, near or on the Great Lakes and related waters. I trust that there will be a full, open and independent enquiry into this matter, involving a full-scale public, "citizens" participation.	Not a comment on the EIS Guidelines.
<a href="#">66</a>	Catherine Cavanaugh		I oppose the dumping of radioactive waste in our treasured Great Lakes. Please reconsider this poor idea!	Not a comment on the EIS Guidelines.
<a href="#">112</a>	Julie Schryer		To fulfill the purpose and provisions of the <i>Canadian Environmental Assessment Act</i> and to meet the expectations of Canadians, the review panels appointed for the environmental assessment of the Bruce Power New Build and Ontario Power Generation's Deep Geologic Repository for Radioactive Wastes must be independent, objective and impartial, and must also be perceived as such. In contrast to what is currently outlined in the draft Joint Panel	See response to CEAR #109.

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			<p>Review Agreement:</p> <ul style="list-style-type: none"> <li>▪ all members should be appointed by the Minister of the Environment</li> <li>▪ if, despite the good reasons for all members being appointed by the Minister of the Environment, some members are appointed by the Canadian Nuclear Safety Commission, the CNSC appointees should form a minority of panel members</li> <li>▪ the Chair of the Panel should be appointed by the Minister of the Environment</li> <li>▪ the Environmental Assessment Process should be independent of the licensing process and vice versa; therefore, the EA panel should not act as the Commission for the purpose of issuing the first license. If an EA approval is granted, the licensing decisions should be made by the full Commission, as per standard practice</li> </ul> <p>To fulfill the purpose and provisions of the <i>Canadian Environmental Assessment Act</i> and to meet the expectations of Canadians, the guidelines for the Environmental Impact Statement should direct the proponent to provide a full discussion of the need for the project, alternative means of meeting that need, alternative means of carrying out the undertaking, and the cumulative effects of the project.</p> <p>The EIS guidelines for the environmental assessment of the Bruce Power New Build and the Deep Geological Repository should direct the proponents to provide:</p> <ul style="list-style-type: none"> <li>▪ a full discussion of environmental impacts on all parts of the environment, including humans, rather than limiting it to the short list of species listed as “valued ecosystem components” in the draft EIS guidelines</li> <li>▪ a discussion of radiation and radioactivity that is broader than the natural and background sources at the Bruce station, i.e. the discussion should be at least the Great Lakes watershed</li> <li>▪ a discussion of Aboriginal communities which includes at least the communities in the Lake Huron watershed</li> </ul> <p>The EIS guidelines for the environmental assessment of the Bruce Power New Build should</p>	

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			<p>direct Bruce Power to provide:</p> <ul style="list-style-type: none"> <li>▪ a clearly stated discussion of the need for the project; the “business” need for Bruce Power to maintain supply during refurbishment does not meet the requirements of the <i>Canadian Environmental Assessment Act</i> to address the need for the project; this discussion should be in a broader social context and linked to a discussion of alternatives</li> <li>▪ a clearly stated technology choice; other reactor designs can be considered as “alternative means” of carrying out the project, but the notion of a "technology neutral" environmental assessment must be completely rejected</li> <li>▪ a thorough examination of potential for malevolent acts, including the diversion of fissile or radioactive material for illicit use, and the environmental impacts of such diversion</li> </ul> <p>The EIS guidelines for the environmental assessment of the Deep Geologic Repository for Radioactive Wastes should direct Ontario Power Generation to provide:</p> <ul style="list-style-type: none"> <li>▪ a discussion of transport of the waste to the Bruce Generating Station; the transportation of waste to the Bruce Generating Station is part of the project, and must be addressed as such</li> <li>▪ a full discussion of why the Intermediate Level Waste is being managed with the Low Level Waste instead of with the high level waste, and a description of how OPG made those decisions with respect to this project</li> <li>▪ a full discussion of failure criteria, contingency planning, and the relationship between the failure criteria and decisions to implement contingency plans, including waste retrieval</li> <li>▪ a full discussion of wastes to be generated through decommissioning and refurbishment of OPG and Bruce Power reactors</li> <li>▪ volume estimates that include various scenarios, including re-builds, new builds, life extensions, and phase out at various time frames</li> </ul>	

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			Thank you for the opportunity to provide comments in this first Phase of the Environmental Assessment for these two projects. Please add me to your distribution list.	
<a href="#">117</a>	Sharon Nolting		<p>I am opposed to any nuclear facility or radioactive waste dump anywhere near the Great Lakes, which are a most precious source of freshwater - as we move into an era where water will be scarce.</p> <p>Nuclear energy is in general too dangerous and expensive and should be phased out as renewable are phased in, but this proposal for storing nuclear waste of any kind near a large water source is insane.</p>	Not a comment on the Guidelines.
<a href="#">47</a>	Renay Daigle-Arsenault		<p>We are facing the challenge of imposing a moratorium in our Province against uranium exploration and mining.</p> <p>Please stop polluting our Country! We the tax payers of this beautiful place have to live with your destructive behaviour and actions. You work for us, that means when the public is against something, you should stop and listen to them! We elect you for making wise choices in our favour but it seems to have adverse effects you are destroying what is most precious to us WATER! IF you can find us another alternative, meaning that we do not need water anymore to drink, bath or cook our food with, let us know, but I think you are far from answer to an alternative so stop the pollution!</p> <p>Once again this look likes a mater of momentary gains (do as little as you can, with the smallest price tag) against the health, safety of the people environment and wildlife.</p>	Comment does not request changes to the EIS Guidelines.
<a href="#">123</a>	Greenpeace Canada Climate & Energy Co-ordinator (David H. Martin for Marvin Resnikoff, PhD and Emily	4.1	<p>Recommendations to EIS Guidelines include:</p> <ul style="list-style-type: none"> <li>long-lived ILRW, such as pressure tubing and calandria, should be separated and stored with spent fuel, not in the proposed DGR (section 4.1)</li> </ul>	No change. The EIS Guidelines do require that low- and intermediate-level waste be assessed.
		7.3	Alternative DGR location sites; above-ground onsite storage at each reactor site; and above-ground onsite storage of Type 3 waste at each reactor site should be considered in	No change made to the EIS Guidelines. The Guidelines do require

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123 (continued)	Brown, M.S.)		Alternatives to (section 7.3).	that alternatives to and alternative means be examined.	
		8	Transportation issues should be discussed within the guidelines (section 8).	No change made to the EIS Guidelines. Transportation is not within the scope of the project as the waste is and would continue to be at the Western Waste Management Facility, which is adjacent to the proposed site for the DGR project.	
		8, 16	That the activity of the water coming into and filling the cavity is monitored. Future residents may ingest contaminated well water (section 8, 16).	No change. The EIS Guidelines do require that the proponent design a follow-up monitoring program.	
		8.4	The preliminary decommissioning plan should include information on similar plans for the Forsmark, Okiluoto, and WIPP disposal areas (section 8.4)	The document was revised to reflect this comment.	
	(Continued)	Greenpeace Canada Climate & Energy Co-ordinator (David H. Martin for Marvin Resnikoff, PhD and Emily Brown, M.S.)	Glossary	That long-term refer to a time period of 10 times the longest half-life of any material within the proposed DGR, and the hazardous life of the proposed repository (glossary).	No change was made to the EIS Guidelines. The definition in the EIS Guidelines adequately defines long-term.
	8.6		Specific malfunction and accident events that include a worst case complete failure scenario and those with a reasonable probability of occurring (section 8.6).	No change. The <i>Canadian Environmental Assessment Act</i> requires only likely significant adverse effects be assessed.	
	8.6, 12		Failure criteria, to be individual and population protective, must take into account the ingress of water into the DGR, and the contamination of Lake Huron, should be	No change. The EIS Guidelines require failure criteria be addressed in	

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			established (section 8.6, 12).	the Follow-Up Program.
		9.1	That the spatial boundaries include the transboundary areas of Lake Huron and the Lake Huron shoreline in Canada and the United States (section 9.1).	No change. Spatial boundaries can be adapted to encompass Great Lakes if it is determined that there is an environmental effect.
		9.2	That the decommissioning waste from OPG reactors, proposed new reactors at the Bruce and Darlington sites, along with proposed and possible refurbishment options for existing reactors be included in the volume estimate (section 9.2).	No change made to the EIS Guidelines. This is beyond the scope of the project.
		12, 16	That a full contingency fund is established sufficient to provide long-term monitoring as well as any accident scenarios (section 12, 16).	Not a comment on the EIS Guidelines. A financial guarantee may be considered as part of licensing.
		13.5	That additional uncertainty factors are specified by the RA to account for future changes in human health and ecological protection levels over the next several thousand years (section 13.5).	No change. No clarification of what uncertainty factors are.
		16	That an archival strategy to update and maintain records be created (section 16).	No change were made to the EIS Guidelines
<a href="#">102</a>	Professor Erika Simpson		<p>According to Ontario’s nuclear emergency plan, parts of southern Ontario could become uninhabitable from radioactive contamination if there was a serious nuclear accident at one of Ontario Hydro’s atomic generating stations. The Ontario government assigns “a very low probability” to a devastating atomic accident of this type, which so far has been experienced only at Chernobyl in the Ukraine.</p> <p>But given the high stakes involved, it is imperative that governments plan to eventually</p>	Comments do not request changes to the EIS Guidelines.

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			<p>moth-ball its nuclear power plants.</p> <p>The rational long-term strategy would be to follow Sweden's example and gradually phase-out nuclear power. Nuclear energy could be replaced by increased gas consumption, electricity imports from Québec, some coal-fired power stations, wind power, and extensive conservation measures, until safer forms of energy production are invented.</p> <p>Meanwhile, the Canadian Environmental Assessment Review Committee is holding public hearings on how to deal with the waste from nuclear power plants. The construction of an underground waste disposal site at the Bruce nuclear complex on the Canadian side of Lake Huron is proposed--the deadline for public input is very short, next Wednesday June 18<sup>th</sup>.</p> <p>The waste site would be located just over one kilometre from Lake Huron, and would house all the radioactive waste from 20 commercial nuclear power reactors in Ontario, with the exception of irradiated nuclear fuel.</p>	
			<p><b>Safety Concerns about Transportation of Nuclear Waste to Disposal Site</b></p> <p>Presumably nuclear fuel bundles and possibly other forms of nuclear waste would be transported there by truck or train. (Transportation by helicopter has already been rejected due to environmental safety concerns). Other countries, like Japan and Germany, have encountered enormous problems due to public opposition — one Japanese ship with nuclear waste on it has been forced to stay at sea, not unload, while German television stations regularly transmit disturbing scenes of protestors surrounding trains that supposedly are transporting nuclear waste.</p> <p>The transport of nuclear waste on Ontario's roads would need to be kept secret due to concerns about possible terrorism. Some highways, like the 401, might have to be shut down entirely so that there was no chance of a terrorist strike against trucks carrying nuclear waste.</p>	<p>Comments do not request changes to the EIS Guidelines.</p>

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			Still No Safe Storage Containers for Nuclear Waste:	
			<p><b>Prohibitively High Costs of Constructing Nuclear Waste Site</b></p> <p>Atomic Energy of Canada Limited’s own estimates of site construction are over \$13 billion, approximately the same as Canada’s entire annual defence budget. Who would bear the initial cost of site construction, and cost overruns commonly expected in huge construction projects? The temptation might be for Ontario to agree to take other countries’ waste in order to offset the prohibitive costs of site construction.</p> <p>If the Canadian government decided to accept waste from other countries, like the United States, Russia, Japan, and Germany, we would become the world’s largest nuclear waste dump, attracting the interest of terrorists. The waste site could become a soft target that could attract threats from terrorists, without Canada even becoming involved in a war.</p> <p>Ensuring the waste site’s security — over hundreds of thousands of years — would be vastly prohibitive. Some security personnel jobs, created over many human generations, might increase the local Bruce community’s economy marginally. But the monetary advantages of creating a few jobs would be offset by the risks incurred given a possible leakage into underground water systems, and the costs of the insurance plans and emergency planning that would need to be developed.</p>	Comment does not request changes to the EIS Guidelines.
			<p><b>Undemocratic decision-making processes decrease public acceptability further</b></p> <p>Public acceptability will be lowered because public input into the environmental hearings has such a short deadline. Next Wednesday’s deadline is too short for proper public input.</p> <p>Six months ago, the President of the Canadian Nuclear Safety Commission was fired by the Harper government for being too strict in her enforcement of reactor safety regulations. Her firing has already raised serious questions about democratic decision</p>	The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission. The Panel will comprise independent members and not current members of the CNSC.

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			<p>making regarding the Bruce complex.</p> <p>The lack of establishment of a new arms-length agency to launch, guide, and participate in the plan and determine its acceptability means that the whole process of seeking democratic input is already undermined, decreasing public acceptability further.</p> <p>In short, Ontario could shortly end up with a liability that would be with us for thousands of years, long after nuclear power plants have fallen out of favour or by the wayside.</p>	
			<p>Erika Simpson is an associate professor of international politics in the department of political science at the University of Western Ontario and the author of NATO and the Bomb (McGill-Queen’s University Press). She is also the vice-chair of the Canadian Pugwash Group, the national affiliate of the International Pugwash Conferences on Science and World Affairs, but these views are her own. If you'd like to submit your comments to the Canadian Environmental Agency, email them to <a href="mailto:DGR.Review@ceaa-acee.gc.ca">DGR.Review@ceaa-acee.gc.ca</a> no later than Wednesday, June 18th. Notably, The Canadian Coalition for Nuclear Responsibility and the Coalition for a Nuclear-Free Great Lakes are asking that the public comment deadline be extended for six months beyond June 18th.</p> <p>This is my commentary and I would like confirmation that it was added to the process. I would also appreciate an opportunity to make a public testimony and I am willing to travel to your panel's location in order to do so.</p>	<p>Not a comment on the EIS Guidelines.</p>
<p><a href="#">37</a></p>	<p>Catholics in Alliance for the Common Good (Brian Peck)</p>		<p>Throughout my life, I always took comfort in thinking that at least Canadians had some sense when it came to the environment, good government and the well being of people. It was always my United States that disappointed. On a positive note, however, the tide is finally turning and our state governments are passing legislation that will clean our Great Lakes, protect its waters and keep out invasive species. Our nations have to collaborate if we truly want this precious resource in the future. My question to you is: what is the point of protecting the water if we are going to continue building new pollution sources such as the Kincardine Nuclear Waste site and a new oil refinery in</p>	<p>Comment does not request changes to the EIS Guidelines.</p>

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			<p>Sarnia? This will only encourage more corporate control of our lakes' health.</p> <p>Canada is HUGE. I challenge you to find better locations outside of the Great Lakes basin. I understand the United States contributes an overwhelming amount of pollution to Canada, but please, continue to lead the way. I think the United States will surely follow.</p> <p>I have been vacationing on the Bruce Peninsula since I was a baby. Lake Huron is one of southern Ontario's most beautiful assets. In Michigan, the lakes are all we have. An oil refinery on St. Claire River will be devastating to Lake St. Claire.</p>	
<a href="#">72</a>	Elise and Louis Rensonnet		<p>We opposed completely the creation of a nuclear dumpsite close to the great lakes. Basic common sense is enough to decide. Do not take deliberate risks with the drinking water supply of millions of people. It is our drinking water in Parry Sound.</p> <p>We are not opposed to nuclear energy in general. We WANT all the security measures and precautions to make it safe now and in the future.</p> <p>It seems to us that the logical placement of a nuclear dumpsite should be close to an actual uranium mining site where the soil is already radioactive, and far away of large populated areas.</p>	No change. Not a comment on the EIS Guidelines.
<a href="#">146</a>	Ethel-Mae Seaman		I am interested in becoming a member of the review panel I am a high school chemistry teacher about to retire and would like to spend time becoming an official member of the review panel.	Not a comment on the EIS Guidelines.
<a href="#">99</a>	Gabriel Caplett		I am very concerned about the proposed nuke dump in Ontario. I strongly encourage you to extend the comment period and include informational meetings on this proposed dump.	Comment noted.
			At least one of these meetings should be held in neighbouring Michigan, as the access site and shaft of this proposed dump is less than a mile from Lake Huron.	The document was revised to reflect this comment. The <i>Canadian</i>

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			<p>As a citizen who lives on Lake Superior, which is connected to all of the other Great Lakes, I am very concerned and would like a chance to ask further questions in person and make further comments.</p>	<p><i>Environmental Assessment Act</i> does not exclude public outside Canada. The EIS Guidelines require that the proponent describe public participation opportunities for non-Canadians.</p>
			<p>This proposed deep underground dump is unprecedented and permanent for all radioactive wastes except irradiated fuel, from 20 Ontario reactors. It is the first deep underground nuclear dump to be placed in sedimentary limestone and shale. Many radionuclides bioaccumulation, many bioconcentrate in the food chain, just like DDT. — Some materials to be entombed here are contaminated with radioisotopes such as the following and would need isolation for millennia:</p> <ul style="list-style-type: none"> <li>▪ Carbon 14 with a half-life of 5,730 years</li> <li>▪ Iodine 129 with a half-life of 15.7 million years</li> <li>▪ Plutonium 239 with a half-life of 24,100 years.</li> </ul>	<p>Not a comment on the EIS Guidelines.</p>
			<p>The radionuclides above are labelled "radionuclides of concern" by the International Joint Commission for the Great Lakes for the U.S. and Canada, and are just a few of the long-lasting radionuclides that would be buried here. Half-lives must be multiplied by 10 to allow these radioisotopes to decay to adequately protect human health. Yet, institutional controls for this dump would last only 300 years. The site is to be abandoned and it is acknowledged that the dump at some point will fill in with (salt) water. 50 to 70 percent of all "low" level wastes will be incinerated, and should be considered in the scoping process, as should decommissioning wastes, and long-term transport from the Darlington and Pickering reactor sites on Lake Ontario. The access site is 1.3 kilometres from Lake Huron - less than a mile. I ask you to consider the following</p>	<p>The transportation of low- and intermediate-level waste is not within the scope of the proposed DGR project as the waste is and would continue to be at the Western Waste Management Facility at the Bruce Power nuclear site.</p> <p>The EIS Guidelines require the proponent to provide a description of the type of waste to be included in the DGR. Further, incineration is already</p>

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				part of the licensed activities of the Western Waste Management Facility. Incineration is not within the scope of the proposed project.
			<p>1. The impacted area of this unprecedented proposed deep geological repository should be expanded to include Michigan and all communities in the Great Lakes Basin. Michigan, in particular, shares with Canada - and First Nation, Anishinaabek and other Indigenous Peoples - the responsibility and the fate for Lake Huron's international waters.</p> <p>Eastern Michigan shoreline is a mere 50 some miles from the access site for this proposed dump. Currently, local fisheries and local municipalities are listed as the only areas that could be impacted by this proposed dump. Great Lakes fisheries cannot be limited to one area, nor can waters and winds of the Great Lakes. Some storms move counter clockwise on Lake Huron. The Lake overturns twice each year, spring and fall. Great Lakes waters continuously move downstream and also evaporate to the air. Fisheries are a \$4 billion industry in the Great Lakes Basin. 40 million people get their drinking water downstream of this proposed dump. A serious accident or incident or significant leaks above or below ground at the site, could devastate Lake Huron and environs forever.</p>	No change. Spatial boundaries can be adapted to encompass Great Lakes if it is determined that there is an environmental effect.
			<p>2. The panel should be made up of members entirely independent of the nuclear establishment in Canada and should not include members of the Canadian Nuclear Safety Commission. As proposed currently, in the joint panel agreement, the Canadian Nuclear Safety Commission will appoint 2 of the 3 member panel. The Ministry of Environment, through the Canadian Environmental Assessment Agency, will choose 1 member of this panel.</p> <p>This is supposedly an independent environmental review panel, different from the environmental assessment completed in 2006, which was overseen by the Canadian</p>	The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission. The Panel will comprise independent members and not current members of the Commission.

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			<p>Nuclear Safety Commission. To all appearances, the environment gets the short straw</p> <p>3. The comment period should be extended by at least 90 days to properly inform Great Lakes communities of this proposed repository that could have grave effects on the Great Lakes forever. The Canadian Environmental Assessment Agency should hold informational meetings in Michigan. — The Canadian Environmental Assessment Agency held one informational meeting in Tiverton, near the proposed site. The meeting was cancelled twice, and one week's notice of the meeting was given each time. Since this dump will be in service for millennia, it only stands to reason that this should not be a rush job.</p> <p>Thank you for your time and I hope to hear from you soon in regards to information about informational meetings in Michigan that I can attend.</p>	<p>The document was revised to reflect this comment. The <i>Canadian Environmental Assessment Act</i> does not exclude public outside Canada. The EIS Guidelines require that the proponent describe public participation opportunities for non-Canadians.</p>
<a href="#">131</a>	Charlie and Dottie Beeman		<p>Expressed opposition to proposal given proximity to Great Lakes, US border, and American concern about drinking water for some many people.</p> <p>Expressed view that Ontario is a rather large province and with 20 nuclear power plants; Ontario should put the spent fuel somewhere away from populated areas and away from the United States.</p>	<p>Comment does not request changes to the EIS Guidelines.</p>
<a href="#">101</a>	Teresa Bertossi		<p>I am very concerned about the proposed nuke dump in Ontario. I strongly encourage you to extend the comment period and include informational meetings on this proposed dump. At least on of these meetings should be held in neighbouring Michigan, as the access site and shaft of this proposed dump is less than a mile from Lake Huron.</p> <p>As a citizen who lives on Lake Superior, which is connected to all of the other Great Lakes, I am very concerned and would like a chance to ask further questions in person and make further comments.</p> <p>This proposed deep underground dump is unprecedented and permanent for all</p>	<p>See response to comment #60.</p>

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			<p>radioactive wastes except irradiated fuel, from 20 Ontario reactors. It is the first deep underground nuclear dump to be placed in sedimentary limestone and shale. Many radionuclides bioaccumulate, many bioconcentrate in the food chain, just like DDT. — Some materials to be entombed here are contaminated with radioisotopes such as the following and would need isolation for millennia:</p> <ul style="list-style-type: none"> <li>▪ Carbon 14 with a half-life of 5,730 years</li> <li>▪ Iodine 129 with a half-life of 15.7 million years</li> <li>▪ Plutonium 239 with a half-life of 24,100 years</li> </ul> <p>The radionuclides above are labelled "radionuclides of concern" by the International Joint Commission for the Great Lakes for the U.S. and Canada, and are just a few of the long-lasting radionuclides that would be buried here. Half-lives must be multiplied by 10 to allow these radioisotopes to decay to adequately protect human health. Yet, institutional controls for this dump would last only 300 years. The site is to be abandoned and it is acknowledged that the dump at some point will fill in with (salt) water. 50 to 70 percent of all "low" level wastes will be incinerated, and should be considered in the scoping process, as should decommissioning wastes, and long-term transport from the Darlington and Pickering reactor sites on Lake Ontario. The access site is 1.3 kilometres from Lake Huron — less than a mile.</p> <p>I ask you to consider the following:</p> <ol style="list-style-type: none"> <li>1. The impacted area of this unprecedented proposed deep geological repository should be expanded to include Michigan and all communities in the Great Lakes Basin. Michigan, in particular, shares with Canada - and First Nation, Anishinaabek and other Indigenous Peoples - the responsibility and the fate for Lake Huron's international waters.</li> </ol> <p>Eastern Michigan shoreline is a mere 50 some miles from the access site for this proposed dump. Currently, local fisheries and local municipalities are listed as the only areas that could be impacted by this proposed dump. Great Lakes fisheries cannot be limited to one area, nor can waters and winds of the Great Lakes. Some storms move counter clockwise on Lake Huron. The Lake overturns twice each year,</p>	

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			<p>spring and fall. Great Lakes waters continuously move downstream and also evaporate to the air. Fisheries are a \$4 billion industry in the Great Lakes Basin. 40 million people get their drinking water downstream of this proposed dump. A serious accident or incident or significant leaks above or below ground at the site, could devastate Lake Huron and environs forever.</p> <p>2. The panel should be made up of members entirely independent of the nuclear establishment in Canada and should not include members of the Canadian Nuclear Safety Commission. As proposed currently, in the joint panel agreement, the Canadian Nuclear Safety Commission will appoint 2 of the 3 member panel. The Ministry of Environment, through the Canadian Environmental Assessment Agency, will choose 1 member of this panel.</p> <p>This is supposedly an independent environmental review panel, different from the environmental assessment completed in 2006, which was overseen by the Canadian Nuclear Safety Commission. To all appearances, the environment gets the short straw.</p> <p>3. The comment period should be extended by at least 90 days to properly inform Great Lakes communities of this proposed repository, that could have grave effects on the Great Lakes forever. The Canadian Environmental Assessment Agency should hold informational meetings in Michigan. - The Canadian Environmental Assessment Agency held one informational meeting in Tiverton, near the proposed site. The meeting was cancelled twice, and one week's notice of the meeting was given each time. Since this dump will be in service for millennia, it only stands to reason that this should not be a rush job.</p> <p>Thank you for your time and I hope to hear from you soon in regards to information about informational meetings in Michigan that I can attend</p>	
<a href="#">79</a>	Clarence Munson		<p>What kind of idiot would even consider a dump site near any great lake? I grieve for my great grandchildren as they will pay for what you do today. Thankfully I won't be here.</p>	Not a comment on the EIS Guidelines.

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			These are my comments on the proposed underground dump.	
<a href="#">56</a>	Sally Schemanski	7.2	The EIS must be able to provide proof that a dump will be secure. It must provide an example of an underground dump that has not leaked for over 300 years. Everyone knows that we can provide numerous examples of underground dumps designed by the best scientists and engineers in the driest climates that have leaked in several years.	No change to the EIS Guidelines. Beyond the scope of the EIS.
			It must provide proof that we can control the movement of water on this planet. We have all seen recently the people in the heartland of the U.S. who could not control their whole city from being flooded for the first time in history. Cement workers or people who work with water will tell you this is impossible.	No change to the EIS Guidelines. Beyond the scope of the EIS Guidelines.
			It must provide proof that a natural occurrence such as an earthquake will not cause a penetration of this dump. Ask the people who have lost everything in tornadoes if you can control this? It must provide proof that these dangerous radionuclides will not be jeopardized en route to this dump. It must provide proof that this dump can be secure from terrorists. It must guarantee that future generations will be willing to guard this waste for thousands of years.	No change to the EIS Guidelines. The EIS Guidelines do require effects of earthquakes as well as accidents and malevolent acts to be examined.
			The EIS must ensure that the entire area be contacted and given the opportunity to comment. This includes everyone in the Great Lakes Basin. Scientists, specialists and even ordinary citizens know that the Great Lakes Basin is a complex system and every change or development affects the whole system. All people living near the transportation routes that these dangerous radionuclides will travel through must be given notice and a chance to comment.	No change. The EIS Guidelines do require public consultation to be conducted.
			In reference to 7.2 in the Draft. Yes, I agree that the one alternative that should be started immediately is reduction at the source.  All nuclear plants should be shut down and replaced with safe sustaining alternatives	Comment does not request changes to the EIS Guidelines.

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			<p>The panel should be independent of the nuclear establishment and should not consist of anyone working in the industry or regulating it. I suggest that it consists of an Aboriginal person, an environmentalist and a scientist. These representatives must not have worked in the industry or benefit from it.</p>	<p>The Panel will comprise independent members and not current members of the Canadian Nuclear Safety Commission. The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission.</p>
			<p>It must provide proof that the act of burying dangerous radionuclides in the Great Lakes Basin with a humid climate and plenty of rain is not a negligent and irresponsible act. It must provide proof that it will not continue the radiologic contamination of the biosphere.</p>	<p>Not a comment on the EIS Guidelines.</p>
<p><a href="#">50</a></p>	<p>Ray Letheren</p>		<p>We, the public, have been sold a bill of goods on nuclear energy. This is not a question of not in my backyard, but not in anyone's!! Stop the proliferation of this energy source and storage of waste until it can be unequivocally proven that it is safe. It doesn't take Rhodes Scholar to associate increased cancer rates with the proximity to a nuclear plant</p>	<p>Comment does not request changes to the EIS Guidelines.</p>
<p><a href="#">97</a></p>	<p>Jeanne Frazer-Poole</p>		<p>Michigan shares the responsibility of maintaining the waters of Lake Huron. So far neither side has done a fantastic job with all the pollutants and alien aquatic species being found everyday in these beautiful waters.</p>	<p>Not a comment on the EIS Guidelines.</p>
			<p>The panel that is being developed should include not just Michigan representatives but the entire United States as well.</p>	<p>The Panel will comprise independent members and not current members of the Canadian Nuclear Safety Commission. The Joint Review Panel will be an independent panel</p>

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				appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission.
			The Great Lakes and all connecting tributaries are our fresh water supplies. That covers a lot more territory than just a village and some small fisheries. I am incensed that you would ever attempt to do this without a full blown study that includes ALL parties affected.	No change to the EIS Guidelines. Spatial boundaries can be added to encompass Great Lakes if it is determined that there is an environmental effect
			The waters of the Great Lakes move down stream, and even evaporate into the air, if something goes wrong it's going to be a huge something affecting millions of people.	Comment does not request changes to the EIS Guidelines.
			We need more time to evaluate this project of yours, and I am requesting a delay of 90 days so that everyone can be informed of this. I will be calling my Senator and Congressmen, and get them involved.	Comment noted.
<a href="#">83</a>	Janet Silk		Please consider the irreplaceable natural resource that we have here in the Great Lakes. There are so many places other than near the water to put a storage facility.	No change to the EIS Guidelines. The EIS Guidelines do require alternatives to and alternative means be examined.
			That is just an accident waiting to happen. We already have enough spills and pollution from the chemical valley in Sarnia; please don't take the chance with all of our lives. Keep our water safe! Please!	Comment does not request changes to the EIS Guidelines.

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<a href="#">71</a>	Robert G. Mills		<p>It is regretful to hear that a nuclear "dump" is being considered within a kilometre of Lake Huron - is nothing sacred?</p> <p>Despite the rhetoric about our knowledge of nuclear power, we still have accidents.</p> <p>Uranium is mined beneath the earth so why not return the waste from whence it came, deep in one of those disused mines in Northern Ontario.</p> <p>How could we even consider depositing waste so near an "upstream" lake? Human pollution is bad enough but nowhere near the disastrous effects of nuclear waste leaks.</p>	Comments do not request changes to the EIS Guidelines.
<a href="#">51</a>	Kitty Dunn		<p>Pleeeeee, Nuclear waste is bad enough in 'onsite' storage units but where it endangers waterways is stupid beyond belief. Considering the length of time this stuff has to be stored it's not a matter of "risk"; it's a matter of which generation[s] will pay the price for our ignorance. It's worth mentioning that if "we" stop mining and using the stuff we'll stop enlarging the problem.</p>	Not a comment on the EIS Guidelines.
<a href="#">33</a>	Richard McKelvie		<p>Lives in Alberta. I have done considerable research on Geothermal power and feel it is a logical option for electrical generation. Its potential dwarfs nuclear and is a true renewable and is safe. Your immediate problem is storage of nuclear waste and geothermal won't address that but it is a solution to a compounding problem. Refers to attachment.</p>	Not a comment on the EIS Guidelines.
<a href="#">60</a>	Peter ten Cate		<p>It appears that all the paperwork has been completed for the approval of a nuclear waste dump at the Bruce Nuclear plant site near Kincardine in Ontario. It appears too that the "implementation plan" (that which will make this nuclear dump an actuality) is more important than the consequences of such a plan. The Environmental Assessment and/or Impact Statements appear to be just arbitrary.</p> <p>"We must be crazy" to have such a dump so close to the waters of Lake Huron (or any other water reservoir for that matter!). Once again, it appears that "Humans are very</p>	Comment does not request changes to the EIS Guidelines.

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			clever, but have no wisdom".	
<a href="#">65</a>	S B-C (O. Campigotto)		<p>In this day and age you would think that we could find better places for our nuclear waste to be disposed of?? But to even fathom the idea of putting it near Lake Huron which in turn could affect our drinking water for up to 30 million people, what a ridiculous idea!</p> <p>Maybe then if the committee has no problem with it we could suggest their backyards as a proposed site?? I hardly doubt they would agree to it right?</p> <p>I live on Lake Huron, I chose this place for the air is pure and the water equally pure. I want my children to have a safe and healthy environment. Not one contaminated by nuclear waste which thus would lead to illnesses and even deaths!</p> <p>If this is to be passed shame on you for letting it happen, I thought that in today's world we would be more concerned about our environment then they who proposed this!</p>	Not a comment on the EIS Guidelines.
<a href="#">82</a>	Marsha Dembosky		<p>1. The impacted area of this unprecedented proposed deep geological repository should be expanded to include Michigan and all communities in the Great Lakes Basin. Michigan, in particular, shares with Canada - and First Nation, Anishinaabek and other Indigenous Peoples - the responsibility and the fate for Lake Huron's international waters. Eastern Michigan shoreline is a mere 50 some miles from the access site for this proposed dump.</p> <p>Currently, local fisheries and local municipalities are listed as the only areas that could be impacted by this proposed dump. Great Lakes fisheries cannot be limited to one area, nor can waters and winds of the Great Lakes. Some storms move counter clockwise on Lake Huron. The Lake overturns twice each year, spring and fall. Great Lakes waters continuously move downstream and also evaporate to the air. Fisheries are a \$4 billion industry in the Great Lakes Basin. 40 million people get their drinking water downstream of this proposed dump. A serious accident or incident or significant leaks above or below ground at the site, could devastate Lake Huron and</p>	See response to CEAR #99.

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			<p>environs forever.</p> <p>2. The panel should be made up of members entirely independent of the nuclear establishment in Canada and should not include members of the Canadian Nuclear Safety Commission. As proposed currently, in the joint panel agreement, the Canadian Nuclear Safety Commission will appoint 2 of the 3 member panel. The Ministry of Environment, through the Canadian Environmental Assessment Agency, will choose 1 member of this panel. This is supposedly an independent environmental review panel, different from the environmental assessment completed in 2006, which was overseen by the Canadian Nuclear Safety Commission. To all appearances, the environment gets the short straw.</p> <p>3. The comment period should be extended by at least 90 days to properly inform Great Lakes communities of this proposed repository, which could have grave effects on the Great Lakes forever.</p> <p>The Canadian Environmental Assessment Agency should hold informational meetings in Michigan. - The Canadian Environmental Assessment Agency held one informational meeting in Tiverton, near the proposed site. The meeting was cancelled twice, and one week's notice of the meeting was given each time. Since this dump will be in service for millennia, it only stands to reason that this should not be a rush job.</p>	
<a href="#">67</a>	Conception Gonzalez		<p>A deep geological repository for radioactive waste is being proposed for construction at Kincardine, Ontario. This letter is being sent in advance of June 18th, the last day for comment on the draft guidelines and joint panel preparatory to the Environmental Impact Statement.</p> <p>The proposal for the permanent repository for radioactive material would be:</p> <ul style="list-style-type: none"> <li>▪ constructed underground less than a mile from Lake Huron</li> <li>▪ under institutional control for only 300 years despite the fact that some of the</li> </ul>	Comment does not request changes to the EIS Guidelines.

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			<p>materials would need isolation for millennia</p> <ul style="list-style-type: none"> <li>▪ and filled by the seepage of salt water at some point in time.</li> </ul> <p>Therefore, it is absolutely necessary that the comment period be extended by at least 90 days so that all communities touching the Great Lakes could have the opportunity to have informational meetings by the Canadian Environmental Assessment Agency and time to comment on the proposal.</p>	
			<p>In addition, it is essential that the panel be made up of persons independent of the nuclear establishment in Canada and not include members of the Canadian Nuclear Safety Commission to assure as objective and full an assessment of the proposal as possible.</p>	<p>The Panel will comprise independent members and not current members of the Canadian Nuclear Safety Commission. The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission.</p>
			<p>The Great Lakes are rare and precious sources of fresh water. Radioactive seepage would contaminate them for thousands of years, making them undrinkable, causing their ruination as habitat and as sources of irrigation. In addition, they would no longer be refreshment for weary spirits nor be objects of beauty but rather sources of fear and ill health. It is essential that everything be done to consider alternative ways of isolating and overseeing radioactive materials in an environment that would have the least impact on earth’s ecosystems and inhabitants</p>	<p>Comment does not request changes to the EIS Guidelines.</p>
<a href="#">70</a>	Wanda Westover		<p>I am opposed to a nuclear dumpsite.</p>	<p>Not a comment on the EIS Guidelines.</p>
<a href="#">98</a>	Brendan Kuras		<p>1. The impacted area of this unprecedented proposed deep geological repository should</p>	<p>See response to comment #60.</p>

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			<p>be expanded to include Michigan and all communities in the Great Lakes Basin. Michigan, in particular, shares with Canada - and First Nation, Anishinaabek and other Indigenous Peoples - the responsibility and the fate for Lake Huron's international waters. Eastern Michigan shoreline is a mere 50 some miles from the access site for this proposed dump.</p> <p>Currently, local fisheries and local municipalities are listed as the only areas that could be impacted by this proposed dump. Great Lakes fisheries cannot be limited to one area, nor can waters and winds of the Great Lakes. Some storms move counter clockwise on Lake Huron. The Lake overturns twice each year, spring and fall. Great Lakes waters continuously move downstream and also evaporate to the air. Fisheries are a \$4 billion industry in the Great Lakes Basin. 40 million people get their drinking water downstream of this proposed dump. A serious accident or incident or significant leaks above or below ground at the site, could devastate Lake Huron and environs forever.</p> <p>2. The panel should be made up of members entirely independent of the nuclear establishment in Canada and should not include members of the Canadian Nuclear Safety Commission. As proposed currently, in the joint panel agreement, the Canadian Nuclear Safety Commission will appoint 2 of the 3 member panel. The Ministry of Environment, through the Canadian Environmental Assessment Agency, will choose 1 member of this panel. This is supposedly an independent environmental review panel, different from the environmental assessment completed in 2006, which was overseen by the Canadian Nuclear Safety Commission. To all appearances, the environment gets the short straw.</p> <p>3. The comment period should be extended by at least 90 days to properly inform Great Lakes communities of this proposed repository, that could have grave effects on the Great Lakes forever.</p> <p>The Canadian Environmental Assessment Agency should hold informational meetings in Michigan. - The Canadian Environmental Assessment Agency held one</p>	

CEAA Document Number	Name	Section	Comment	Response
			informational meeting in Tiverton, near the proposed site. The meeting was cancelled twice, and one week's notice of the meeting was given each time. Since this dump will be in service for millennia, it only stands to reason that this should not be a rush job.	
<a href="#">127</a>	Jill Shilling		I am writing to voice my concern about the nuclear dump. Please I don't want this any where near MI and my kids. We need to move forward and begin to utilize alternatives energy sources, clean energy sources!	Not a comment on the EIS Guidelines.
<a href="#">57</a>	Christina Liang		In response to today's article in the Port Huron area's Times Herald, I just wanted to express my disbelief that an organization would even consider a plan with even a minute chance of polluting the largest freshwater supply in the world. Aside from the fact that Lake Huron supplies our current drinking water supply (and we are NOT ok with you choosing to potentially pollute OUR drinking water supply), in the often predicted event of a worldwide water shortage, how much more so will the healthy, unpolluted Great Lakes water supply be critical to mankind's survival on the planet? And considering those wide-ranging ramifications, you would choose to infringe upon others' water supplies and take responsibility for polluting this critical water source?	Comment does not request changes to the EIS Guidelines.
			It would be wise to begin researching other areas, far inland and away from water supplies, for this radioactive waste site.	No change. The EIS Guidelines do require alternatives to and alternative means be examined by the proponent.
			As the first line of the article states, "In 1989, fierce local opposition killed a proposal to build a 16,000-acre landfill for radioactive waste in western St. Clair County." With the growing awareness of the critical state of the planet now, the opposition is likely to be MANY times greater. I love Canada. I love many Canadians. But we already have to watch tons of Canada's garbage come across the border....filling our landfills is one	Comment does not request changes to the EIS Guidelines.

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			<p>thing, but how can we compromise on our water supply, with not just "waste", but RADIOACTIVE waste? We just can't compromise on this. Not just for our own sake, but for the sake of everyone on the planet who may need to tap into this essential resource in the event of a freshwater shortage.</p> <p>I call on you, as fellow human beings on this planet, to do the ethical thing. Take responsibility for your waste and don't compromise the largest freshwater supply in the world. Don't even take a CHANCE of compromising it. Not just for Michiganians' sake, not just for your own sake, for the sake of the planet. It's your water, too. Please don't take the risk. Water is truly a priceless resource. Fresh water is a non-renewable, critical resource on this planet, and we all have to jointly take responsibility for protecting it. If we pollute our waters, we're all going to pay the price. We're all in this together and we have to take responsibility for the survival of mankind and the health of our planet. If we pollute all our waters, what then? There is no "then". Please protect our limited, essential resource of water, above all else. Life on earth depends on it.</p> <p>How many friends/family do you know who have or have had cancer? The rates are already unduly high in the Port Huron area. Please protect our children and your own children from any additional increased risk of environmental hazards. We have so much environmental fallout to deal with already. Please don't take even the smallest risk of adding to it.</p> <p>We are counting you, as our fellow mankind, to do the best thing for all of us. Thank you for your consideration and respect. I know so many Americans who respect Canada as a country of great integrity, peace, and collective conscientiousness (consideration for the whole, and as a result, for the individual). I ask you to make your decisions from a place of integrity, peace, and collective conscientiousness. Remember, we're all in this together.</p>	
<a href="#">148</a>	Veronica Blake		A deep geological repository for radioactive waste is being proposed for construction at	Comment does not request changes to

CEAA Document Number	Name	Section	Comment	Response
			<p>Kincardine, Ontario. This letter is being sent in advance of June 18th, the last day for comment on the draft guidelines and joint panel preparatory to the Environmental Impact Statement.</p> <p>The proposal for the permanent repository for radioactive material would be:</p> <ul style="list-style-type: none"> <li>▪ constructed underground less than a mile from Lake Huron</li> <li>▪ under institutional control for only 300 years despite the fact that</li> <li>▪ some of the materials would need isolation for millennia</li> <li>▪ and filled by the seepage of salt water at some point in time</li> </ul>	the EIS Guidelines.
			<p>Therefore, it is absolutely necessary that the comment period be extended by at least 90 days so that all communities touching the Great Lakes could have the opportunity to have informational meetings by the Canadian Environmental Assessment Agency and time to comment on the proposal.</p> <p>In addition, it is essential that the panel be made up of persons independent of the nuclear establishment in Canada and not include members of the Canadian Nuclear Safety Commission to assure as objective and full an assessment of the proposal as possible.</p> <p>The Great Lakes are rare and precious sources of fresh water. Radioactive seepage would contaminate them for thousands of years, making them undrinkable, causing their ruination as habitat and as sources of irrigation. In addition, they would no longer be refreshment for weary spirits nor be objects of beauty but rather sources of fear and ill</p>	<p>Not a comment on the EIS Guidelines.</p> <p>The Panel will comprise independent members and not current members of the Canadian Nuclear Safety Commission. The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission.</p> <p>Not a comment on the EIS Guidelines.</p>

CEAA Document Number	Name	Section	Comment	Response
			health. It is essential that everything be done to consider alternative ways of isolating and overseeing radioactive materials in an environment that would have the least impact on earth's ecosystems and inhabitants.	
<a href="#">132</a>	Lynda Ramsay		To propose sighting a nuclear dump so close to a fresh-water lake that supplies 40 million people with drinking water is sheer and utter madness. Have you not heard of Sellafield in Britain? The coolant water from this nuclear power station polluted beaches and the Irish sea resulting in local people developing leukemia and various cancers. This proposed site is totally unacceptable.	Not a comment on the EIS Guidelines.
<a href="#">133</a>	Gary Ward		Strongly oppose a Nuclear Waste site anywhere near any of the Great Lakes. Risking contamination of such a large body of fresh water is foolish, un-wise, lack of sound judgment. Perhaps investment into alternative sources of power such as solar, wind energy, biomass fuels would be a better choice.	Comment does not request changes to the EIS Guidelines.
<a href="#">78</a>	John E. Holmans		I fully support the move to oppose the construction of a DUD adjacent to the Bruce reactor. I am concerned, not just because I live nearby, but because I believe such poor decision making is driven by selfish, short term political and economic goals. Even with the best of intentions we cannot come close to guaranteeing the long-term safety requirements of sites such as these.	No change made. Not a comment on the EIS Guidelines.
<a href="#">45</a>	Kathy Berry		1. The impacted area of this unprecedented proposed deep geological repository should be expanded to include Michigan and all communities in the Great Lakes Basin. Michigan, in particular, shares with Canada - and First Nation, Anishinaabek and other Indigenous Peoples - the responsibility and the fate for these international waters. The eastern Michigan shoreline is a mere 50 some miles from the access site for this proposed dump.	See response to CEAR #99.

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			<p>Currently only local fisheries and local municipalities are named as the only areas that could be impacted by this proposed dump. Fisheries are dynamic and cannot be limited to one area, as are the waters and winds of the Great Lakes. Some storms move counter clockwise on Lake Huron. The Lake overturns twice each year, spring and fall. Waters from the Great Lakes continuously move downstream and also are evaporated to the air. Fisheries are a \$4 billion industry in the Great Lakes Basin. A serious accident or incident or significant leaks above or below ground at the site, could devastate Lake Huron and environs forever.</p> <p>2. The panel should be made up of members entirely independent of the nuclear establishment in Canada and should not include members of the Canadian Nuclear Safety Commission. As proposed currently, in the joint panel agreement, the Canadian Nuclear Safety Commission will appoint 2 members of the 3 member panel. The Ministry of Environment, through the Canadian Environmental Assessment Agency, will choose 1 member of this panel. This is supposedly an independent environmental review panel, different from the environmental assessment completed in 2006, which was overseen by the Canadian Nuclear Safety Commission. To all appearances, it looks like the environment gets the short straw.</p> <p>3. The comment period should be extended by at least 90 days to properly inform Great Lakes communities of this proposed repository that could have grave effects on the Great Lakes forever.</p> <p>The Canadian Environmental Assessment Agency should hold informational meetings in Michigan. The Canadian Environmental Assessment Agency held one informational meeting in Tiverton, near the proposed site. The meeting was cancelled twice, and one week's notice of the meeting was given each time. Since this dump will be in service for millennia, it only stands to reason that this should not be a rush job.</p>	
<a href="#">147</a>	Sukumaran Menon		I vehemently oppose the Deep Geologic Repository Project to store low and	Comment does not request changes to

CEAA Document Number	Name	Section	Comment	Response
			<p>intermediate-level radioactive waste in the municipality of Kincardine, Ontario. Drinking water is such a scarce natural resource, shortage of which is evident all over the world. Also this scarcity is exacerbated by Global warming. It is unconscionable that a radioactive waste site is considered to be located near the Great Lakes which has the world's 20% fresh water supply. Over 40 million people reside in the Great Lakes region. It is not right even to consider locating such a site near a natural wonder like the Great Lakes which has the most important life sustaining resource for humanity.</p>	<p>the EIS Guidelines.</p>
<p><a href="#">94</a></p>	<p>Sara Gay Damman</p>		<p>As a U.S. citizen living on the shores of the Great Lakes, I am deeply concerned about this project.</p> <p>The impact could be deleterious to all the Great Lakes for generations</p>	<p>Not a comment on the EIS Guidelines.</p>
			<p>Informational meetings should be held in every region of both countries that border the lakes.</p>	<p>The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission. The Panel will comprise independent members and not current members of the Canadian Nuclear Safety Commission.</p>
			<p>Further study needs to be done by non-nuclear industry affiliated scientists. I beg you to expand the period for both comment and study and to include representatives on all the Great Lakes communities.</p>	<p>Not a comment on the EIS Guidelines.</p>

CEAA Document Number	Name	Section	Comment	Response
			<p>The potential dangers of this project are far too dangerous to not allow for serious and detailed analysis.</p> <p>Therefore, I ask you to expand the time frame for study, to include truly objective scientists, to allow for a longer period of comment, and to recognize the dangers associated with this project</p>	<p>Comment does not request changes to the EIS Guidelines.</p>
<p><a href="#">90</a></p>	<p>Bev Sawyer</p>		<p>First, I feel insecure about the low and intermediate level designations of radioactive wastes, and extremely insecure about the transport of any wastes from Darlington and Pickering. That these would be buried in a vast area under and around Lake Huron churns my stomach.</p> <p>Clearly, the problem of waste from nuclear power generation has not been adequately dealt with and burying it deep within the rock under the earth’s surface is not a solution in this age of global climate destabilization. Also, for those, like myself, who feel their relationship with the planet, it is unethical to construct a repository for these wastes we have made indefinitely dangerous and to leave this problem we can’t solve to our children and grandchildren. Every day more and more people are feeling their relationship to the planet, and we need them to do so.</p> <p>Precisely why are some environmental assessment requirements waived or relaxed for the nuclear industry? Is it because we think we need it and must somehow construct a “fit” to make it possible? I think we have just begun to bring renewable on board and help people conserve – people are willing — they need detailed information. Now we’ve created an obstacle to our renewable energy sector by reserving transmission capacity for the reactors being refurbished. Unthinkable.</p>	<p>Comment does not request changes to the EIS Guidelines.</p>
			<p>I would also like to comment on the procedure for appointing the Joint Panel Review members.</p> <p>It is important that they be unbiased and free of any conflict of interest; therefore I suggest we need to look further afield than anyone appointed by the CNSC which has</p>	<p>The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear</p>

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			<p>shown itself to be favourable to the nuclear industry in the past.</p> <p>And I suggest that, as proposed at present, this panel doesn’t have enough members.</p> <p>Thank you for this opportunity to respond.</p>	<p>Safety Commission. The Panel will comprise independent members and not current members of the Canadian Nuclear Safety Commission</p>
<p><a href="#">81</a> and <a href="#">136</a></p>	<p>Sarah Hutchinson</p>		<p><i>(Only comments on the Federal Environmental Assessments for Ontario Power Generation’s Deep Geologic Repository for Radioactive Wastes — Comments on the EIS Guidelines were included).</i></p>	
			<p>To fulfill the purpose and provisions of the <i>Canadian Environmental Assessment Act</i> and to meet the expectations of Canadians, the review panels appointed for the environmental assessment of the Bruce Power New Build and Ontario Power Generation’s Deep Geologic Repository for Radioactive Wastes must be independent, objective and impartial, and must also be perceived as such. In contrast to what is currently outlined in the draft Joint Panel Review Agreement:</p> <ul style="list-style-type: none"> <li>▪ all members should be appointed by the Minister of the Environment</li> <li>▪ if, despite the good reasons for all members being appointed by the Minister of the Environment, some members are appointed by the Canadian Nuclear Safety Commission, the CNSC appointees should form a minority of panel members</li> <li>▪ the Chair of the Panel should be appointed by the Minister of the Environment</li> <li>▪ the Environmental Assessment Process should be independent of the licensing process and vice versa; therefore, the EA panel should not act as the Commission for the purpose of issuing the first license. If an EA approval is granted, the licensing decisions should be made by the full Commission, as per standard practice</li> </ul> <p>To fulfill the purpose and provisions of the <i>Canadian Environmental Assessment Act</i> and to meet the expectations of Canadians, the guidelines for the Environmental Impact Statement should direct the proponent to provide a full discussion of the need for the</p>	<p>See response to CEAR 109.</p>

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			<p>project, alternative means of meeting that need, alternative means of carrying out the undertaking, and the cumulative effects of the project..</p> <p>The EIS guidelines for the environmental assessment of the Bruce Power New Build and the Deep Geological Repository should direct the proponents to provide:</p> <ul style="list-style-type: none"> <li>▪ a full discussion of environmental impacts on all parts of the environment, including humans, rather than limiting it to the short list of species listed as “valued ecosystem components” in the draft EIS guidelines</li> <li>▪ a discussion of radiation and radioactivity that is broader than the natural and background sources at the Bruce station, i.e. the discussion should be at least the Great Lakes watershed</li> <li>▪ a discussion of Aboriginal communities which includes at least the communities in the Lake Huron watershed</li> </ul> <p>The EIS guidelines for the environmental assessment of the Bruce Power New Build should direct Bruce Power to provide:</p> <ul style="list-style-type: none"> <li>▪ a clearly stated discussion of the need for the project; the “business” need for Bruce Power to maintain supply during refurbishment does not meet the requirements of the <i>Canadian Environmental Assessment Act</i> to address the need for the project; this discussion should be in a broader social context and linked to a discussion of alternatives</li> <li>▪ a clearly stated technology choice; other reactor designs can be considered as “alternative means” of carrying out the project, but the notion of a "technology neutral" environmental assessment must be completely rejected</li> <li>▪ a thorough examination of potential for malevolent acts, including the diversion of fissile or radioactive material for illicit use, and the environmental impacts of such diversion</li> </ul> <p>The EIS guidelines for the environmental assessment of the Deep Geologic Repository</p>	

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			<p>for Radioactive Wastes should direct Ontario Power Generation to provide:</p> <ul style="list-style-type: none"> <li>▪ a discussion of transport of the waste to the Bruce Generating Station; the transportation of waste to the Bruce Generating Station is part of the project, and must be addressed as such</li> <li>▪ a full discussion of why the Intermediate Level Waste is being managed with the Low Level Waste instead of with the high level waste, and a description of how OPG made those decisions with respect to this project</li> <li>▪ a full discussion of failure criteria, contingency planning, and the relationship between the failure criteria and decisions to implement contingency plans, including waste retrieval</li> <li>▪ a full discussion of wastes to be generated through decommissioning and refurbishment of OPG and Bruce Power reactors</li> <li>▪ volume estimates that include various scenarios, including re-builds, new builds, life extensions, and phase out at various time frames</li> </ul> <p>Thank you for the opportunity to provide comments in this first Phase of the Environmental Assessment for these two projects. Please add me to your distribution list and keep me informed of future opportunities to participate in these important reviews.</p>	

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<a href="#">38</a>	Roger Hunka (MAPC Regional Administrative Office)		<p>Referred to a news article which revealed a plan by the Nuclear Power Industry, with the sanction of the government of Ontario and the government of Canada, (Cabinets) to store "life form killing nuclear reactor wastes in the vicinity of a major water source for millions of humans".</p> <p>Expressed the view that we cannot figure out how to store the spent fuel for the next thousands of years</p> <p>Expressed the view that the plans of a few desperate nuclear reactor executives to rid themselves of their legacy of death stored on their sites, or the jump on the wagon scramble to use the most expensive and most dangerous fuel and technology known to human kind, are desperate acts, which will result in dire consequences</p> <p>Expressed the view that First Minister of Ontario and the Prime Minister of Canada are acting outside their legal authority within the Canadian Federation and our Parliamentary system of governance to endorse the proposal. No one in Canada has a right to endorse an activity which they know will kill millions of Peoples, today or in time. It is a crime against humanity, their own citizens, the Peoples of Canada".</p>	Not a comment on the EIS Guidelines.
<a href="#">129</a>	Caleb Sikes		<p>What kind of idea is it to allow NUCLEAR WASTE to be buried less that 1 mile from Michigan main water supplier? This is preposterous! Nearly 40 million people rely on drinking water from downstream of this proposed dump, from Port Huron, Mi. to Buffalo, New York including the St. Lawrence seaway and Lake Erie. 40 Million People (HUMAN BEINGS, children, Elderly) not to mention how many plant and animal species that also inhibit this area!</p> <p>What about the microorganisms that contribute to that natural health of ALL the living creatures in this area? This is something that would have been considered in the 1900s when societies were unknowledgeable or just being stupid. No question this CANNOT BE ALLOWED!</p>	Not a comment on the EIS Guidelines.

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<a href="#">128</a>	Krista Sikes		What kind of idea is it to bury nuclear waste so close to a water supply in Port Huron Michigan? That is a terrible idea. Who would come up with such a ridiculous idea? And, What about the local residence and not to mention the pollution in the actual land! Are we seeking to turn the lake into what Black river has become from all the waste that was dumped many years ago!	Not a comment on the EIS Guidelines.
<a href="#">115</a>	Northwatch (Brennain Lloyd)		<p><b>EIS Guidelines</b></p> <p>Expressed view that proposal is of interest to Northwatch because of its precedent setting nature and because of its close proximity to Lake Huron, and the potential for adverse effects on the North Channel and North Shore of Lake Huron, Manitoulin Island, and the broader Great Lakes ecosystem.</p> <p>During Phase I of the Federal EA for OPG's DGR, Northwatch convened seven community meetings to discuss the proposal.</p>	Comments do not request changes to the EIS Guidelines.
			EIS should discuss environmental impacts on all parts of the environment, including humans, rather than limiting it to the short list of species listed as “valued ecosystem components” in the draft EIS guidelines.	The document was revised to reflect this comment. The proponent is required to modify the list of valued ecosystem components (VECs) as appropriate following consultations with the public, Aboriginal groups, federal and provincial government departments and relevant stakeholders, including comments received by the Canadian Environmental Assessment Agency and the Canadian Nuclear Safety Commission during the public comment period.

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			EIS should discuss radiation and radioactivity that is broader than the natural and background sources at the Bruce station, i.e. the discussion should be at least the Great Lakes watershed.	The EIS Guidelines outline geographic study areas that should serve as the basis for developing project-specific and effect-specific study areas. The spatial boundaries can be adapted to encompass the Great Lakes if it is determined that there is an environmental effect.
			EIS should provide discussion of Aboriginal communities which includes at least the communities in the Lake Huron watershed.	No change. The EIS Guidelines do not preclude consideration of any impacted Aboriginal community. Further, the spatial boundaries can be adapted to encompass the Great Lakes if it is determined that there is an environmental effect.
			EIS should contain a full discussion of why the Intermediate Level Waste is being managed with the Low Level Waste instead of with the high level waste, and a description of how OPG made those decisions with respect to this project.	The proponent defines the scope of the project. The EIS Guidelines require that the proponent define the need for and the purpose of the proposed project. The management of used nuclear fuel is not within the scope of this proposed project.
			EIS should contain a full discussion of failure criteria, contingency planning, and the relationship between the failure criteria and decisions to implement contingency plans, including waste retrieval.	No change was made to the EIS Guidelines. Contingency plans are discussed in the EIS Guidelines.

CEAA Document Number	Name	Section	Comment	Response
			<p>EIS should contain a full discussion of wastes to be generated through decommissioning and refurbishment of OPG and Bruce Power reactors.</p> <p>EIS should contain volume estimates that include various scenarios, including re-builds, new builds, life extensions, and phase-out at various time frames.</p>	<p>No change was made. The EIS Guidelines require the proponent to provide a description of the type of waste to be included in the DGR. This description includes the amount, type and source of waste.</p>
			<p>Incorrectly find that the President of the Commission will recommend to the Minister of Natural Resources that the Minister of Natural Resources recommend the proposed candidate to the Governor in Council for the appointment (section 3.3)"</p>	<p>Comment noted.</p>
		1	<p><b>Context</b></p> <p>Transportation of the wastes to the “interim facility” should be included in the description of the project, including the brief description found in section 1.2 of the EIS Guidelines, but more importantly in the substantive description of the project and its potential environmental impacts to be provided in the EIS itself.</p>	<p>No change made to the EIS Guidelines. The transportation of low- and intermediate-level waste is not within the scope of the proposed DGR project as the waste is and would continue to be at the Western Waste Management Facility at the Bruce Power site.</p>
		2	<p><b>Guiding Principles</b></p> <p>This section serves as useful background information to the review process, but these guiding principles need to be integrated into the substantive sections of the EIS Guidelines: for example, section 2 included a discussion of the Precautionary Approach, but the term does not appear in the document beyond that introductory discussion; the EIS should clearly outline how the proponent has taken a precautionary approach and applied the precautionary principle in the development of the project proposal and will apply that approach and principle in the project’s implementation.</p>	<p>The document was revised to reflect this comment. Section 2.5 of the EIS Guidelines — Precautionary Approach has been expanded.</p>

CEAA Document Number	Name	Section	Comment	Response
		4	<p><b>Scope</b></p> <p>The scope of the project should include the transportation of the wastes from their source (i.e. reactor stations, including Pickering, Darlington and Bruce) to the “interim” facility.</p>	<p>No change made to the EIS Guidelines. The transportation of low- and intermediate-level waste is not within the scope of the proposed DGR project as the waste is and would continue to be at the Western Waste Management Facility at the Bruce Power site.</p>
		5	<p><b>Context</b></p> <p>The description of the proponent should clarify whether OPG or the Nuclear Waste Management Organization is the proponent; according to media reports in May 2008 the NWMO is assuming management of the DGR project, but it remains unclear who the proponent is for the project ; the respective roles and responsibilities of each of the organizations should be clearly described.</p>	<p>The document was revised to reflect this comment. The EIS Guidelines requires a summary of the nature of the current management structure and any reasonable foreseeable changes in management structure and organizational accountability.</p>
		6	<p><b>Engagement and Information Distribution</b></p> <p>The level of engagement with Aboriginal communities throughout the Lake Huron watershed should be described, including the Aboriginal communities of Manitoulin Island and the North Shore of Lake Huron; similarly, stakeholder engagement should be described for the regional study area, i.e. throughout the Lake Huron watershed, including the stakeholders on Manitoulin Island and the North Shore of Lake Huron.</p>	<p>The document has been revised to reflect this comment. A list of key issues relating to stakeholder engagement has been added to the EIS Guidelines.</p>
		7	<p><b>Project Justification</b></p> <ol style="list-style-type: none"> <li>1. The Purpose and Need for the project must be described in terms of the public interest, rather than simply a business opportunity.</li> <li>2. The current description of what is to be addressed in “Alternatives to the Project” is</li> </ol>	<ol style="list-style-type: none"> <li>1. No change. The EIS Guidelines state that the proponent defines the purpose and need for the project.</li> </ol>

CEAA Document Number	Name	Section	Comment	Response
			<p>too narrow, and should not be limited to those which are within the interest of OPG.</p> <p>3. “Alternatives” to the project should include a discussion of the alternative of non-centralized waste management, i.e. waste is managed at source, and source reduction.</p> <p>4. Reduction at source should include non-production through the reduced use of nuclear power; however, this is more appropriately dealt with as an “alternative to” rather than an “alternative means”.</p>	<p>2. The EIS Guidelines states that the proponent outlines the alternatives to the project that are within the control and/or interest of the proponent.</p> <p>3. No change. The proponent can identify and describe alternatives that from the proponent’s perspective are technically and economically feasible. Provincial energy policy is not within the scope of this project.</p> <p>4. No change. Provincial energy policy is not within the scope of this project.</p>
		8	<p><b>Project Description</b></p> <p>1. The project description should include a discussion of retrieval of the wastes, and what the decision criteria or failure measures would be that would trigger a decision to retrieve the waste, and what the related contingency plans are</p> <p>2. The timeline for long-term performance and the performance measures should be included in the EIS.</p>	<p>1. The EIS Guidelines require that the proponent include in its description of the follow-up program any contingency procedures/plans or adaptive management procedures that would be taken to address unforeseen effects for correcting exceedances.</p> <p>2. the proponent is required to propose timelines in the project description. No change required.</p>

CEAA Document Number	Name	Section	Comment	Response
		9	<p><b>Environmental Assessment Boundaries</b></p> <ol style="list-style-type: none"> <li>1. The Spatial Boundaries for the study must (rather than may) include Lake Huron watershed, including communities in the North Channel of Lake Huron, Manitoulin Island, the North Shore of Lake Huron, Georgian Bay and the French River.</li> <li>2. The Temporal Boundaries for assessing project impacts must absolutely not be limited to “the period of time during which the maximum impact is predicted to occur”.</li> <li>3. The list of Valued Ecosystem Components is far too limited; the VECs should include all species known to inhabit the regional study area.</li> </ol>	<ol style="list-style-type: none"> <li>1. No change. The spatial boundaries can be adapted to include a wider regional area if it is determined that there are environmental effects.</li> <li>2. No changes were made to the document. The EIS Guidelines require that the proponent consider hazardous lifetime of the contaminants associated with the proposed project.</li> <li>3. The document was revised to reflect this comment. The proponent is required to modify the list of valued ecosystem components (VECs) as appropriate following consultations with the public, Aboriginal groups, federal and provincial government departments and relevant stakeholders, including comments received by the Canadian Environmental Assessment Agency and the Canadian Nuclear Safety Commission during the public comment period.</li> </ol>
		10	<b>Existing Environment</b>	

CEAA Document Number	Name	Section	Comment	Response
			<p>1. The emphasis of study should not be limited to the short list of species included in the current list of VECs.</p> <p>2. The description and study of land uses and values should be done for the regional study (vs. Bruce site).</p>	<p>1. The document was revised to reflect this comment. The proponent is required to modify the list of valued ecosystem components (VECs) as appropriate following consultations with the public, Aboriginal groups, federal and provincial government departments and relevant stakeholders, including comments received by the Canadian Environmental Assessment Agency and the Canadian Nuclear Safety Commission during the public comment period.</p> <p>2. The document was revised to reflect this comment.</p>
		11	<p><b>Effects Prediction, Mitigation Measures and Significance of Residual Effects</b></p> <p>These studies should be conducted for the regional study area, i.e. not limited to the local study area.</p>	<p>No change. The proponent must describe the geographic extent of the effect.</p>
		12	<p><b>Accidents and Malfunctions</b></p> <p>Accidents and malfunctions should include accidents and malfunctions with a broad range of probabilities, including low probability events.</p>	<p>No change. The EIS Guidelines require that accidents and malfunctions be assessed. The Panel can request more information should more scenarios need to be assessed.</p>

CEAA Document Number	Name	Section	Comment	Response
		13	<p><b>Long-Term Safety of DGR</b></p> <p>The various scenarios and related models and model inputs should be clearly described in the EIS, in a manner that members of the public can understand but that those with expertise in the area can make a technical assessment of the work done and the soundness of conclusion reached.</p>	Comments noted, no change to the EIS Guidelines required.
		14	<p><b>Cumulative Effects</b></p> <p>The discussion of cumulative effects should be done at the spatial level of the regional study area, and should include a full range of effects, including nuclear and non-nuclear activities; uranium mining, Milling and refining on the North Shore of Lake Huron should be included in this evaluation of the cumulative effects.</p>	Comments noted, no change to the EIS Guidelines required. The cumulative effects assessment will be required to assess all likely projects in the area where impacts are predicted.
<a href="#">64</a>	Karen O'Brien		<p>Can you tell me why anyone would want to store nuclear waste just one mile from the Great Lakes?</p> <p>St. Clair County is one of the highest Cancer Areas in the U.S. and we feel That part of that is caused from Chemical Valley. Why put more people in danger. I think you should honour the wishes of the America people because you are one of our Neighbours.</p> <p>Please reconsider the site. Don't take changes that Could CAUSE Major Health Problems.</p> <p>Canada is a Very Big Country Certainly you have any other site.</p>	Not a comment on the EIS Guidelines.
<a href="#">46</a>	Tory McDonald		<p>Please add my name to the list of Citizen's for Renewable Energy with a strong aversion to the proposal to bury low-medium level radioactive nuclear waste in deep geological repositories including salt mines on the shores of Lake Huron. I'm also strongly opposed to any further expansion of nuclear in Canada and suggest we should start a decommissioning strategy. This whole expansion to Bruce Power is moving ahead with reckless abandon for the people living in surrounding areas, downstream and upstream,</p>	Comment does not request changes to the EIS Guidelines.

CEAA Document Number	Name	Section	Comment	Response
			<p>the potential risk of meltdown and the future contamination of the watershed. Tory McDonald.</p> <p>The Great Lake Basin already has fish with cancer tumours around Ipperwash and the cancer rate in Huron-Bruce is high for the population. There is also significant higher rates of cancer around the nuclear and oil refineries and the open pit uranium mining sites. Even where the hot water comes back into the lake at Bruce site the water doesn't freeze over anymore. The water table at the harbour at Goderich is noticeably lower this year.</p> <p>I'm also opposed to the Saskatchewan Tar Sands and the extraction of uranium from Rabbit Lake in Saskatchewan. The mess in Fort McMurray has contaminated the watershed in Alberta and is beyond clean-up. How is it possible to get another EA in Saskatchewan approved? Bruce Power is in charge of the radiation testing of fish and employees but I feel strongly about having testing done by the community before anymore radiation comes into this area.</p>	
			<p>Aside from the lack of responsibility to the people and environment, this whole myriad of contamination and exploitation of Canada's resources is for the benefit of the US, China and France...absolutely nothing to do with "keeping the lights on" as McGuinty quotes.</p> <p>Does the fact that Tibet lies above the largest deposit of oil and uranium in the world have anything to do with this race for nuclear, uranium and oil. Is it possible that Bush just needs oil to continue his war towards China?</p> <p>Other countries are decommissioning nuclear plants why aren't we? The fact alone that</p>	<p>The only FN communities notified of this are Saugeen and Cape Croker. There is to be full disclosure to the public not just selectively involving the areas of immediate financial benefit with obvious supporters of the projects.</p> <p>No change to the EIS Guidelines. The EIS Guidelines do not preclude consideration of impacted Aboriginal communities.</p> <p>Comment does not request changes to the EIS Guidelines.</p>

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			<p>the countries that now want nuclear don't have the water to store the spent rods is cause for concern. If Canada is set up for storage than we'll not only be storing for Canada but overseas and US as well. I understand there is \$\$\$millions offered to store the radioactive waste...and it is all about money.</p> <p>It wouldn't hurt to do a bit more investigation into the Canadian Nature Conservancy. They are linked to George W.Bush, Henry Paulson  <a href="http://www.nature.org/pressroom/leadership/art11950.html">http://www.nature.org/pressroom/leadership/art11950.html</a>  <a href="http://www.whitehouse.gov/news/releases/2006/05/20060530.html">http://www.whitehouse.gov/news/releases/2006/05/20060530.html</a> , sponsored by Barrick Gold(Bush Sr. past board of directors) and the Ontario Budget specifically allotted millions to Nature Conservancy. Nature Conservancy is purchasing a lot of waterfront in the Lake Huron and Manitoulin Island area...purchasing waterfront globally. I think we should be paying closer attention to why they securing so many waterfronts especially when I see a link between Bush Sr./Jr., Ontario Government and Barrick Gold.</p>	
<a href="#">358</a>	Carl Ayling		<p>Are you people insane? Stop this right now! Who do you think you are to propose such an idiotic thing as putting the lives and future generations' lives at risk by drilling a hole next to one of our lakes, or in one of our lakes to store nuclear waste? Are you insane? INSANE? This is the most retarded thing I've ever heard in my life! You should be put in jail for even trying something like this. Yes, in jail, and we should throw away the key! !! How dare you! How dare YOU! HOW DARE YOU! Why does it take a citizen to point out the total insanity of this idea to you? How is it</p> <p>you got your job in the first place? With the continents about to shift, because of changing ocean currants, from global warming, regardless if it's human generated or not, we are going to experience earthquakes! YOU know the things that are going to make what you plane to do very dangerous! STOP THIS INSANITY NOW!</p>	Not a comment on the EIS Guidelines.
<a href="#">20</a>	Interested Party		No nuclear waste storage, no more exploration or mining of uranium, no new nuclear power plants. We must use money to develop non-nuclear alternatives like wind and	Not a comment on the EIS Guidelines.

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			<p>solar power.</p> <p>No place is a suitable storage place, stop the propaganda, and make the planet safe for our grandchildren. No more madness so a few corporations can profit.</p>	
<a href="#">362</a>	Scott Galambos		<p>Please, tell me you Einstein's in the government haven't decided to build a radioactive waste dump close to the great lakes. Like really, theft through incompetence, stupidity and corruption isn't enough?</p> <p>Please, get a clue, deep within the granite shield somewhere, not close to important water.</p>	Not a comment on the EIS Guidelines.
<a href="#">62</a>	D.W. Dietrich		<p>I am heartened by the clear and firm position and information. But I find the disposal method totally unacceptable. It is the logical extension of the flush toilette, a Victorian invention based on "out of sight, out of mind". We are still having trouble in imagining and implementing alternatives for our own sewage. However, radioactive "sewage" is forever, to the nth generation. Words fail to convey the crass ignorance, short-sightedness, and total disregard for life forms on this planet, when a group of people not only are proposing to put a DUD in the heart of one of the largest reserves of dwindling fresh water in the world, but are doing so by refusing to have an independent arm's length body to access the risk. What are they trying to hide? It behoves us "conservatives for life" to wake them up to the dangers for the sake of their own children for as far as we can see into the future.</p>	Comment does not request changes to the EIS Guidelines.
<a href="#">135</a>	Janis McElrea		<p>I would like to register my concerns regarding the Bruce Power New Reactor Build project and the proposed OPG nuclear waste repository.</p> <p>I would like to see our governments and their agencies take the lead in protecting our environment and its citizens by saying NO to these proposals.</p> <p>I truly believe that we do have new proven technologies that can replace conventional energy generation and that we should not be continuing along a path that has many</p>	Not a comment on the EIS Guidelines.

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			<p>dangerous effects. Past experience has shown problems with similar projects and we need to be using new clean power generation in place of nuclear.</p> <p>Please consider these comments in your environmental assessments.</p>	
140	Canadian Coalition for Nuclear Responsibility (CCNR)		<p>There should be no CNSC representation on the review panel.</p> <p>The Proposed Panel amounts to an almost total capitulation of the Minister of Environment to the licensing agency. Such a panel would have no credibility as an “object” panel, since CNSC staffs have worked very closely with the proponent for many years.</p>	<p>Comment does not request changes to the EIS Guidelines. The Panel will comprise independent members and not current members of the Canadian Nuclear Safety Commission.</p>
			<p>There is no mention is made of the international agreement known as the Espoo Convention.</p>	<p>No change was made to the document. The EIS Guidelines requires that the proponent summarize and discuss applicable international agreements.</p>
			<p>The proposed Deep Underground Dump is less than a mile from the shores of Lake Huron, and that point on the shoreline is in turn scarcely more than 50 km from the Upper Peninsula of the State of Michigan; it is unconscionable that the environmental assessment process has not been modeled from the outset so as to optimize the involvement of our American neighbours.</p>	<p>Not a comment on the EIS Guidelines.</p>
		9.1	<p>It is distressing on p.21 that communities do not include the Upper Peninsula of the State of Michigan.</p>	<p>No change was made to the EIS Guidelines. Spatial boundaries can be adapted to encompass Great Lakes if it is determined that there is an environmental effect.</p>
			<p>CCNR strongly recommends that the deadline for comments on the draft guidelines be extended by six months after June 18, during which time the CEAA and/or the</p>	<p>The <i>Canadian Environmental Assessment Act</i> does not exclude</p>

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			proponent shall undertake to ensure that the participation of American citizens living in potentially affected communities is both encouraged and facilitated.	public outside Canada. The EIS Guidelines require that the proponent describe public participation opportunities for non-Canadians.
			There is no specific requirement for the proponent to justify the proximity of the proposed facility to Lake Huron, other than sheer convenience. This important question should be addressed on a priority basis and dealt with as one of the most serious questions related to the siting of this proposed radioactive dump.	No change. The EIS Guidelines do require alternative s to and alternative means be examined.
			A true decommissioning operation for the facility as a whole would involve removing the buried radioactive wastes from the facility and restoring the facility to something approaching the original natural conditions.	Not a comment on the EIS Guidelines.
			CCNR believe that the proponent should be required to spend an entire chapter of the EIS delineating the various categories of waste (i.e. ion exchange resins, irradiated pressure tubes, internals of steam generators, etc.) together with a careful delineation of the physical, chemical, and radiological properties of the radionuclides and other toxic materials involved in each of these different categories.	The document was revised to reflect this comment. The proponent must provide a description of the waste characteristics (including source, chemical and radiological hazard) as well as how the properties, chemical and radiological hazards will change with time.
			Special attention must be paid to the effect of brine on the particular waste forms that are envisaged.  Special attention should be paid to those isotopes with the longest half-lives in each case".	No change. The follow-up program must include any contingency procedures/plans for addressing unforeseen effects.

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126	Chiefs and Councils Saugeen Ojibway Nation (SON)	Section 1.3: Preparation and Review of the EIS	<p>The last two paragraphs in this section are confusing, and should more clearly explain how the panel would perform its two distinct functions in conformity with the scheme in the CEAA, in particular sections 34-37</p> <p>Following public hearings, the joint review panel will prepare a report that includes ... follow-up program, <u>and a summary of any comments received from the public. The report will be submitted to the Minister of Environment and the CNSC, and made available to the public. The CNSC will consider the report and decide, subject to the approval of the Governor in Council, whether the project should be considered for licensing.</u></p> <p><u>If it is decided that the project should be considered for licensing,</u> the joint review panel will make <u>the</u> decision whether to grant a site preparation license under the <i>Canadian Nuclear Safety and Control Act</i>.</p>	The document was revised to reflect the comment. Additional wording was added to clarify the Panel's functions.
		Section 2: Guiding Principles	The Guiding Principles should more fully and clearly reflect the purposes of the CEAA in the context of this panel review	Comment did not request changes to the EIS Guidelines.

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		Section 2.1: Environmental Assessment as a Planning Tool	Environmental assessment is a planning tool used to <u>ensure that projects are considered in a careful and precautionary manner, in order to avoid or mitigate the possible adverse effects of development on the environment, and to promote sustainable development and thereby achieve or maintain a healthy environment and a healthy economy.</u> The environment assessment of the project must, <u>consistently with those purposes,</u> identify possible environmental effects; propose measures to mitigate adverse effects and predict whether there will be significant adverse environmental effects after mitigation measures are implemented; and <u>consider whether the project would be a sustainable development.</u>	The document was revised to reflect this comment.
		Section 2.2: Public Participation and Aboriginal Engagement	Another objective of the overall review process is to involve potentially affected Aboriginal people, <u>in order that the environmental assessment can identify and address concerns regarding any changes that the project may cause in the environment and the resulting effects of any such changes on the current use of lands and resources for traditional purposes by Aboriginal persons, as well as concerns regarding other effects the project may have on asserted Aboriginal Rights, Aboriginal Title or Treaty Rights and corresponding mitigation or accommodation measures.</u> The proponent must ensure that it engages with Aboriginal people that may be affected by the project and that have asserted or have established Aboriginal rights, Aboriginal title or treaty rights. In preparing the EIS, the proponent must ensure that Aboriginal people have the information that they require in respect of the project and of how the project may impact them. The proponent is required to describe in the EIS how the concerns <u>respecting</u> Aboriginal people will be addressed; that description should include the consideration and description of any asserted or established Aboriginal rights, title and treaty rights, <del>and</del> the potential impact of the project on those, <u>and corresponding mitigation or accommodation measures.</u>	The document was revised to reflect this comment.

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		Section 2.3: Traditional Knowledge	<p>Traditional knowledge relating to <del>factual information</del> on such matters as ... and its review.</p> <p>Traditional knowledge ... confidentiality. <u>If requested by an Aboriginal people, the proponent should co-operate with that people to develop mutually agreed arrangements for the Aboriginal people themselves to provide traditional knowledge to the environmental assessment, either by themselves or in collaboration with the proponent</u></p>	The document was revised to reflect this comment.
		Section 2.4: Sustainable Development	<p>SON recommends this section should be expanded, in order to explain sustainable development consistently with the purposes of CEAA and the approach used in other panel reviews for high-impact and high risk projects, such as the Voisey’s Bay Mine and Mill, the Mackenzie Gas Project, the Whites Point Quarry and Marine Terminal and the Red Hill Creek Expressway.</p> <p>Sustainable development seeks to <u>achieve or maintain a healthy environment and a healthy economy, and therefore must meet the needs of present generations without compromising the ability of future generations to meet their own needs. Its three objectives are preserving environmental integrity, improving social equity and improving economic efficiency. In order to satisfy those objectives, a project must make a positive overall contribution towards environmental, social, cultural and economic health and well being.</u></p> <p>A project that takes these concerns into account must strive to integrate and balance these three objectives in the planning and decision-making process and must incorporate public participation. The project, including its alternative means, will take into account the relations and interactions among the various components of the ecosystems and meeting the needs of the population</p> <p><u>In assessing whether the project would be a sustainable development, the environmental assessment will consider:</u></p>	<p>The document was not changed. The proponent is required to include the EIS consideration of the extent to which the project contributes to sustainable development in particular:</p> <ul style="list-style-type: none"> <li>a) the extent to which biological diversity may be affected by the project; and</li> <li>b) the capacity of renewable resources that are likely to be significantly affected by the Project to meet the needs of present and future generations</li> </ul>

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			<ul style="list-style-type: none"> <li>• <u>The extent to which it would make a positive overall contribution towards environmental, social, cultural and economic sustainability;</u></li> <li>• <u>Whether the project has been planned and designed so as to promote and achieve sustainability;</u></li> <li>• <u>Whether monitoring, management and reporting systems have been designed to incorporate indicators of sustainability; and</u></li> <li>• <u>The views of the public, including the Aboriginal peoples and other affected populations, respecting the overall contribution the project would make towards sustainability</u></li> </ul>	
		Section 2.5: Precautionary Approach	<p>SON recommends this section should be changed, in light of the very substantial risks and uncertainties respecting possible environmental impacts of the project, and so as to explain the precautionary principle consistently with the purposes of CEAA, decisions of the Supreme Court of Canada and the approach used in other panel reviews for high-impact or high-risk projects.</p> <p>One of the purposes of environmental assessment <u>under CEAA</u> is to ensure that Projects are considered in a careful and precautionary manner before authorities take action in connection with them, in order to ensure that such Projects do not cause significant adverse environmental effects.</p> <p><u>Paragraph 7 of the <i>Bergen Ministerial Declaration on Sustainable Development (1990)</i> defined the precautionary principle as follows: “In order to achieve sustainable development, policies must be based on the precautionary principle. Environmental measures must anticipate, prevent and attack the causes of environmental degradation. Where there are threats of serious or irreversible damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.”</u></p> <p><u>The Supreme Court of Canada has quoted this explanation of the principle and has</u></p>	The document was revised to reflect this comment. The proponent is required to demonstrate how it applied the precautionary principle.

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			<p><u>recognized the precautionary principle as the principle of customary and conventional international law, stating that interpretations of Canadian law that reflect that principles are to be preferred.</u></p> <p><u>To be valid, environmental decision-making under CEAA must address the reality of scientific uncertainty and incomplete knowledge. The precautionary principle informs decision-makers to take a cautionary approach, or to error on the side of caution, especially where there is a large degree of uncertainty or high risk.</u></p> <p>In applying the precautionary approach, the proponent must:</p> <ul style="list-style-type: none"> <li>• Demonstrate that <u>all aspects of the project have been examined and planned</u> in a careful and precautionary manner in order to ensure that they do not cause serious or irreversible damage to the environment;</li> <li>• Outline the assumptions made about the effects of <u>all aspects of the project and the approaches that are proposed</u> to minimize these effects;</li> <li>• Identify any <u>proposed</u> follow-up and monitoring activities planned, particularly in areas where scientific uncertainty exists in the prediction of effects; and Present public views on the acceptability of these effects.</li> </ul> <p>The precautionary approach has been adopted as an element of Canadian government Policy [Reference 4]</p>	
		Section 4.2: Factors to be considered in the EIS	<p>SON has made some suggestions regarding the inclusion of additional considerations under item “h. alternative means”, specifically a fulsome description of alternative locations considered by the proponent, or that formed part of the proponent selection process. And the consideration of a “phase site selection” approach. Those comments can be found below under s7.3</p> <p>SON suggests that one additional factor be added at the end of the list in 4.2:</p>	The document was revised to reflect this comment. An additional factor added to the list in section 4.2.

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			<p><u>1. effects the Project may have on SON’s asserted Aboriginal Rights, Aboriginal Title or Treaty Rights, and corresponding accommodation measures.</u></p>	
		<p>Part II – Content of the EIS</p>	<p>A general statement is required to expressly link the contents of the EIS to the general principles in Part I. This should be done clearly, so it will not be necessary to explain those linkages in every sub-section in Part II.</p> <p>Son suggests: <u>The EIS as a whole must reflect the Guiding Principles in 2.0. The proponent must, in every section of the EIS, expressly explain, with appropriate detail, how all phases and aspect of the project satisfy the applicable Guiding Principles in 2.0.</u></p> <p>SON also notes that some of the sub-sections in Part II appear inconsistent with each other or with the Guiding Principles in 2.0. We have not attempted to edit the subsections of Part II to address that problem. We suggest that it is important that this be done after final decisions are made respecting the statements of Guiding Principle in 2.0.</p>	<p>The document was revised to reflect this comment.</p>
		<p>Section 5.1: The Setting</p>	<p>In this and the other sub-sections in Part II, SON’s two residential communities, Saugeen and Cape Croker, should be included when regional communities are listed or considered.</p>	<p>The document was revised to reflect this comment.</p>
		<p>Section 5.4: Environmental Assessment and Regulatory Process and Approvals</p>	<p>SON suggests the following amendment to the 4<sup>th</sup> bullet in this section:</p> <ul style="list-style-type: none"> <li>• <u>Summarize and discuss the approach, including the role of regulatory bodies and mechanisms, to ensure compliance with the existing federal and provincial environmental legislation ...</u></li> </ul>	<p>The document was revised to reflect this comment.</p>

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		Section 5.5: International Agreements	SON suggests the following amendments to the first paragraph in this sub-section:  The proponent must <u>summarize and discuss describe the implications of any in the EIS applicable international agreements, standards, designations, or action plans their implications and relationship to the planning and regulatory process described in 5.4, and how they may influence the project or its environmental effects.</u>	The document was revised to reflect this comment. The wording in the Guidelines correctly reflects expectations.
		Section 6.2: Government Agency Engagement	SON recommends:  The EIS must describe the proponent’s engagement <del>undertaken</del> with provincial and federal <del>government</del> <u>Ministries and</u> agencies and local governments which should include the municipalities of Kincardine, Saugeen Shores, Arran-Elderslie, Brockton and Huron-Kinloss. This must also include the <u>Ontario Ministry of Energy</u> , Ontario Ministry of Natural Resources Park Superintendents for McGregor Point and Inverhuron Provincial Parks. The EIS must describe the objectives of such engagement, the methods used, issues raised during such engagement and the ways in which the proponent has addressed these issues.	The document was revised to reflect this comment..
		Section 7.3: Alternative Means of Carrying out the Project	SON suggests that this section be amended to specifically require the proponent to explain how this location was selected for its current proposal. This must include a full description of all other sites considered and a detailed analysis and explanation of why those locations were not preferred.  The proponent should be specifically required to include in this description a review of the work other organization or entities have done relating to site selection for DGRs (both <u>fuel</u> and non-fuel wastes) in Ontario and Canada that the proponent has relied upon.  SON notes that the Nuclear Waste Management Organization developed its Adaptive Phased Management approach for the planning and development of specific proposals	The document was revised to reflect this comment.  Section 8.0 of the document requires the proponent to provide a complete description of the project which is expected to address this level of detail.

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			for managing nuclear fuel waste in ways that would be sustainable and that this approach was approved by the Minister of Natural Resources in July, 2007. The proponent should explain whether the planning and development for the DGR project adopts a similar approach. If it does, the proponent should describe and discuss how it does that. If such an approach has not been used, the proponent should explain why not.	
		Section 8.5: Long-Term Performance of the Facility	As currently written, this section appears to <u>trivialize</u> the threshold concern respecting the project, i.e., the very, very long-term during which nuclear non-fuel wastes must be reliably secured. The proponent should be required to <u>quantify the number of years that the various types of waste would continue to be toxic and therefore need to be effectively contained</u> . That timeframe should be used to inform EIS sections 8.6 and 8.7. A clear linkage should also be explained between this section and sections <u>12 and 15</u> .	The life of the project is addressed in Section 9.2. The temporal boundaries are applied to all section of the EIS Guidelines.
		Section 8.7: Environmental Protection Plan	<p>In order to properly consider whether the project would be a sustainable development, the Joint Review Panel needs to consider whether the proponent's proposed environmental protection plan, including compliance with CNSC standards and requirements, would result in an appropriate degree of certainty that risks of serious or irreversible environmental effects would be avoided.</p> <p>SON suggests that a third paragraph be added in this section: <u>The proponent should analyze and discuss the extent to which, and with what degree of certainty, its environmental protection plan and environmental management system, including compliance with applicable regulatory and license standards, would mitigate the risks of serious or irreversible adverse environmental effects that may result from the project.</u></p>	No change was made to the document. The EIS Guidelines were written to balance prescriptive requirements against allows flexibility on the part of the proponent on how to address these requirements.

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		Section 9.1: Spatial Boundaries and Scale	SON suggests that there should be a clear statement in this section indicating the depth of the proposed investigations. Although adequate definitions are provided for each of the investigative scales in terms of site boundaries and the local area, there are no clear definitions as to what subsurface area is to be considered.	The document was revised to reflect this comment.
		Section 10: Existing Environment	<p>Although the generality of the guidelines ensures that the EIS will cover all aspects of the project. SON feels that more specificity is needed with respect to the ecological scale of the assessment respecting the biological environment, e.g. population level ecological risk assessment (“PLERA”) and the approach to baseline and monitoring studies (Before-after-control-impact “BACT”).</p> <p>SON’s recommendations are the following:</p> <ul style="list-style-type: none"> <li>a) Specify that the ecological assessments of Valued Ecosystem Components (VECs), when biological in nature, be carried out using population level ecological risk assessment (PLERA) modeling</li> <li>b) Specify that stochastic environmental component models that will generate probability based predictions about environmental impacts are implemented in the EIS</li> <li>c) Specify that before-after-control-impact (BACI) design for baseline data collection be implemented to enable effective testing of predictions during following-up monitoring</li> <li>d) Specify that the work plan incorporates the collection of baseline data to include reference site(s) and determine adequate number of replicates to ensure sufficient data is acquired for BACI design and analysis in follow-up monitoring</li> </ul>	Minor changes were made to the document to clarify the intent of the comment, that baseline data collection should be sufficient to support both the prediction of effects in the EIS and any necessary follow-up program. The comment requests a level of prescriptive detail that is not considered appropriate at the EIS Guidelines stage.

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			<p>Incorporation of these suggestions will likely require amendments to sections 10, 10.1.4 and 10.1.5.</p> <p>With respect to the socio-economic environment, SON suggests a statement be added that human environments should be described in ways that recognize interrelationships, system functions and vulnerabilities. In order for the Panel to consider whether the project would be sustainable in respect of the socio-economic environment, the proponent should describe whether and how the various phases of the project would make a positive overall contribution towards social, cultural and economic health, or would act as a bridge to a more sustainable future by maintaining or enhancing local and regional resources, capacities and opportunities.</p> <p>Incorporation of these suggestions will likely require amendments to sections 10 and 10.2.</p> <p>SON also suggests changes to paragraph 7 of section 10</p> <p>Traditional activities carried out by Aboriginal people must be described by the proponent. The proponent should provide information ... The analysis should focus on the identification of potential adverse effects of the project on the ability of future generations of Aboriginal people (<u>for seven generations and longer, so as to reflect the duration of possible effects the project may have on the environment</u>) to pursue traditional activities or their <u>way of life, along with other effects the project may have on asserted Aboriginal Rights, Aboriginal Title or Treaty Rights and corresponding mitigation or accommodation measures.</u></p> <p>SON also suggest that the guidelines provide more detail on what criteria will be used to conclude whether the “information on subsurface site characteristics will be sufficient to allow the development of site-specific assessment models”</p>	

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		Section 10.1: Bio-physical Environment	<p><u>10.1 Bio-Physical Environment</u></p> <p>SON suggests the inclusion of an additional statement indicating what groundwater quality parameters will be explored and a specific indication of the types of samples to be collected for major ion chemistry, including density related parameters and for stable isotopic measurements.</p> <p>SON suggests the following changes to 10.1.6 para. 3 and 4:</p> <p>Areas subject to contamination from previous nuclear or non-nuclear industrial activities require baseline characterization of radionuclide and hazardous substance levels within biota of interest.</p> <p>A description of the current <u>and past</u> radiological monitoring and management programs should be provided.</p> <p>In addition, SON suggest that the proponent provide a descriptive and justification for its determination of “biota of interest” in the section above.</p>	The requested level of detail exceeds what is generally asked of the proponent.
		Section 10.2: Socio-economic Conditions	<p>SON suggests minor changes to section 10.2.3</p> <p>The EIS must describe land use at the site and within the local and regional study areas. The proponent should identify the lands, waters and resources of specific social, <u>economics</u>, archaeological, cultural or spiritual value to the Chippewas of Saugeen First Nation, the Chippewas ... The EIS must identify traditional activities, including activities for food, social, ceremonial and other cultural purposes, in relation to such lands, waters and resources with a focus on the <del>current</del> use of lands and resources for traditional purposes.</p>	The document was revised to reflect this comment.

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		Section 11.1: Effects Predictions	<p>SON suggests that the proponent be required to explain how it intends to isolate the predicted effects from its project from the effects that may be caused by other, nearby, nuclear facilities. This requirement is particularly important given that this project will be the first DGR in Canada, one of only a few in the world, and possibly the only one situated in this specific type of geological environment.</p> <p>If this cannot be done in a satisfactory manner, SON recommends that the analysis in this section be conducted in a way that will demonstrate the cumulative effects of this project with the predicted effects of other projects currently existing at site, and those that are reasonably foreseeable. This suggestion may require changes to the remaining sub-section of 11.</p>	No changes were made to the document. The Guidelines have already guided the proponent to provide information on direct effects as well as cumulative effects.
		Section 11.4: Bio-Physical Environment	<p>SON suggest the following change to 11.4.1:</p> <p>The EIS must describe the predicted effects ... (including physical strength characterizes), <u>geothermal conditions</u> and thermal regime.</p> <p>SON suggests that the potential impact on the geochemistry should also be evaluated, as this may influence the safety case, as changes in geochemistry may result in precipitation or dissolution of the geological material resulting in instability.</p> <p>SON suggest that a statement should be added to 11.4.3 to that the proponent must justify the model used for each set of simulations and provide details on the model verification and validation cases. The model used should be well-enough described such that another modeler would be able to repeat the work.</p>	The document was revised to reflect this comment.

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		Section 11.4.5: Aquatic Environment	SON suggests a subsection be supplemented based on the draft EIS guidelines for Bruce Power's NNPP. In particular, the proponent should be required to describe potential effects, including changes to food chain and food web dynamics as a habitat component as it relates to fish populations. Particular attention should be placed on effects to the Aboriginal commercial fishing industry. If the proponent does not believe such effects are likely, a full explanation of this conclusion should be provided.	The document was revised to reflect this comment. Wording has been added to describe changes to food chain and food web dynamic as well as the effects on the Aboriginal commercial fishing industry.
		Section 11.5: Socio-economic Effects	SON suggest the following change to 11.5.3:  The EIS must identify any change that the project is likely to cause in the environment and any effect of any such change on the use of lands and resources for traditional purposes...  It is unclear to SON why section 11.5.8 Natural Resources has been omitted from these EIS guidelines, but included in those for the Bruce NNPP. SON suggests that the section as it is drafted in those guidelines be included here as well.	The document was revised to reflect this comment.
		Section 12: Accidents and Malfunctions	SON is concerned that the guidelines use an inappropriate approach for selecting the range of malfunctions and accidents to be described. Because the project is designed to manage highly toxic nuclear waste materials, all reasonably possible types of accidents and malfunctions should be described including malevolent acts.  Appropriate probability risk assessments should be completed and described, and those should address all reasonably foreseeable internal and external initiating events during all phases and operational aspects of the project, including the transportation of wastes from other parts of Ontario to the sites.  Descriptions must include safeguards the proponent has planned in order to protect against such occurrences and corresponding contingency procedures.	The document was revised to reflect these comments.

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		Section 13.5: Interpretation of Assessment Results and Comparison with Acceptance Criteria	It should not be assumed that acceptance criteria that comply with the NSCA would satisfy sustainability and precautionary principles or be acceptable to the public. Rather those issues need to be transparently described and discussed in the EIS so that the review panel can properly consider whether this project would be sustainable.	No changes were made to this document. The existing wording in the EIS Guidelines correctly reflects expectations.
		Section 14: Cumulative Effects	<p>This section of the EIS is uniquely important for the assessment of this project, as compared to the cumulative effects analysis is required for most industrial projects. The level of analysis apparently suggested in the current draft of this section is not adequate to reflect the real concerns that SON has respecting the very serious and long-term risks that are posed for their territory and their collective future by a combination of reasonably foreseeable nuclear energy projects.</p> <p>Although OPG’s current proposal is for the construction of a deep geological waste facility for non-fuel nuclear wastes, it is also reasonably foreseeable that this project will function at least in a collateral way, as a test site for a fuel waste DGR at this site. It is critical that the proponent fully explain any connection between this project and a future project to construct a DGR for fuel wastes. In addition, the cumulative effects assessment should be conducted on a basis that a DGR on this site for fuel wastes is a reasonably foreseeable project.</p> <p>In the meantime, we can anticipate that the Western Waste Storage Facility as well as other fuel and non-fuel waste storage facilities on the site may require upgrades and expansions to accommodate the increasing levels of waste resulting from the refurbishment, construction and operation of reactors at the Bruce site. These projects,</p>	The cumulative effects assessment section has been expanded to be more consistent with the level of detail provided for other Review Panels.

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			<p>too, are reasonably foreseeable and must be considered as part of this analysis.</p> <p>The site proposed for the DGR currently contains one of the world's largest nuclear installations with its attendant stores of fuel and non-fuel nuclear wastes. The SON were not consulted about or involved in the decision to develop those facilities. They did not consent to those, and should not be considered a willing host community for those facilities that already exist.</p> <p>Bruce Power has proposed to construct up to four nuclear reactors at the current Bruce Nuclear Complex. That application is the subject of a parallel, but separate Environmental Assessment. Bruce Power has proposed that the lifespan of its existing nuclear reactors be continued for many more years through more refurbishments and has publically expressed interest in a combination of more refurbishments and new reactors although that combination is not the subject of a current application. It is essential that the cumulative effects assessment under this section include these projects as reasonable foreseeable projects.</p> <p>In order to consider being a willing host for the project under consideration, SON will need the results of a thorough and robust cumulative effects analysis that reflects the sustainability and precautionary principles discussed in Part 1.</p> <p>An appropriate cumulative effects analysis must include assessments of the various nuclear energy related project proposals that would be developed by this proponent and others. SON suggests that a credible cumulative effects analysis for this project require that risk assessments be conducted for all the separate nuclear projects that are now reasonable foreseeable for development in the region. And those risks assessments must be done to the same standards as those for the project itself.</p> <p>Additionally, SON suggests that a two-part cumulative effects analysis is required for these nuclear related projects. First, an analysis and discussion are required, respecting</p>	

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			<p>whether and to what extent, the presence of multiple nuclear installations on one site (including reactors of different types and ages) would affect the probability of accidents or malfunctions. Second, a similar analysis and discussion are required respecting whether, and to what extent, this multiplicity of nuclear installations in the same location would affect the seriousness of the consequences or the ability to mitigate the effects of such accidents and malfunctions</p> <p>The cumulative effects analysis should also include the analysis of bio-physical and socio-economic effects from other reasonable foreseeable developments in the region, including other types of energy-related projects</p>	
		<p>Section 16: Monitoring and Follow-up Programs</p>	<p>SON considers that the effectiveness and reliability of the regulatory system for all phases of the project needs to be fully considered in this environmental assessment because of the uniquely high risk and high impact nature of the project.</p> <p>Appropriate changes to this section should be considered in order to require the proponent to provide a full description and analysis of its own proposed monitoring and adaptive management systems, as well as of the capacity and integrity of applicable regulatory systems, since both of those must be relied on to provide the legal and institutional capacity to protect the biophysical and socio-economic environments in the Great Lakes region for a very long time, if this project is allowed to proceed within SON territory.</p> <p>Issues peculiar to the DGR proposal, respecting the maintenance of institutional integrity, memory and capacity over millennia, should be considered and discussed in relation to this project, as part of the assessment of the project's sustainability.</p> <p>A consideration of these issues, including the roles that could be played over an extended period of time by the proponent, regulatory agencies, SON and others, will be a particularly important source of information required for both the sustainability analysis</p>	<p>No changes were made to this section as the proponent is required through other section of the Guidelines to describe the current regulatory system that would apply to this project from various levels of government.</p>

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			under CEAA and accommodation discussions between the Crown and SON.	
<a href="#">111</a>	Walter L. Robbins		The need for a detailed rationale as to why the DGR option was chosen is required. A rationale as to why this particular site was chosen; a site so near to one of the Great Lakes (L. Huron).	No change. The EIS Guidelines require that the proponent provide a rationale for why the DGR and the location were chosen.
			As no spent fuel will be allowed, the EIS Guidelines must deal more directly with the question of possible future expansions of the proposed facility to accommodate high level waste.	No change. Beyond the scope of the EIS Guidelines.
			Clarification by OPG of role of the NWMO.	The document was revised to reflect this comment. The EIS Guidelines requires a summary of the nature of the current management structure and any reasonable foreseeable changes in the management structure and organizational accountability.
			Request for explanation by the Proponent of nature and characteristics of the rock formations at the DGR site.	The document was revised to reflect this comment. The EIS Guidelines require the proponent to describe the geology and structural geology of the

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				site.
			Request for explanation by the Proponent of plan to deal with any intrusions of water from limestone rock.	No change to the EIS Guidelines. The Guidelines do require monitoring programs to be described.
			Clarification by OPG of what is required (modifications, configurations) to accommodate nuclear fuel wastes Request assurances that nuclear fuel waste will not be allowed in the proposed facility or an expansion and modification thereof.	No change. Beyond the scope of the EIS Guidelines.
			Proponent to provide information concerning its capability to prevent theft and terrorist attacks; and its measures to effectively deal with risks".	Changes made to the EIS Guidelines to reflect this comment. The EIS Guidelines requires that the EIS address environmental effects that could results from international malevolent acts (section 12).
			The CEAA should be the sole agency involved in the Panel; it is a fatal mistake to involve CNSC in the selection and conduct of the Panel for this EA. There are persons in Canadian society who have the credentials for the role of Panel member.	Comment does not request changes to the EIS Guidelines. The Panel will comprise independent members and not current members of the Canadian Nuclear Safety Commission. The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission.
<a href="#">143</a>	Darlene Buckingham		To compromise the drinking water for so many people and one of the largest fresh water lake systems in the world is foolhardy. This is an ecological disaster waiting to happen.	Comment did not request changes to

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			<p>The nature of nuclear waste that it is toxic for thousands of years requires it to be stored in a way that will never impact the water of future generations. This is far too risky and another location must be found. The nuclear industry due to toxic nuclear waste is far too risky to be continued. It is time for a nuclear phase-out program and stewardship program to protect future generations from the toxicity of nuclear waste.</p> <p>It would also be wise to appoint an independent board that has no interest in the nuclear industry to provide a fair and unbiased environmental assessment that would have full credibility and confidence of the public.</p> <p>Public health and safety is at stake. The best possible solution to this dangerous situation must be found. Careful consideration must be given to decide where these dangerous materials can be stored without impacting the integrity of a large source of our fresh water supply. This is a very serious situation and must be given a full panel environmental review by an independent board that will honour public health and safety and the environment above all else.</p> <p>Thank you for your consideration.</p>	<p>the EIS Guidelines.</p>
<p><a href="#">402</a></p>	<p>Redford Township Fire Department (Chief Tom Solack)</p>		<p>Expressed view that construction of a DGR into sedimentary rock so close to shoreline of Lake Huron within the Great Lakes watershed is unacceptable and an international Criminal act on the part of the Canadian Government.</p>	<p>Comment did not request changes to the EIS Guidelines.</p>
<p><a href="#">403</a></p>	<p>State Representative 83rd District (John Espinoza)</p>		<p>Requested CEAA to expand impacted areas to include Michigan and Lake Huron as a whole.</p> <p>Requested that Michigan residents be included in process.</p>	<p>No change to the EIS Guidelines. Spatial boundaries can be adapted to encompass Great Lakes if it is determined that there is an environmental effect.</p>

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			<p>Request expansion to the amount of time in which the public may submit comments on the proposal.</p> <p>Welcomes Canadian officials to the Sanilac and St. Clair County to discuss the concerns.</p>	<p>Comment did not request changes to the EIS Guidelines.</p>
<p><a href="#">145</a></p>	<p>Elizabeth Smith</p>		<p>Expressed concern about the DGR given its location in the Great Lakes basin and its affects on the human population and biological life; low permeability rock and limestone; and exposure to certain levels of radiation; and new knowledge on the affects of exposure to uranium on health</p> <p>Expressed view that investment in nuclear energy will increase its use further augmenting the problems, dangers and risks. Alternative investment now and lessening the commitment to nuclear power is required.</p>	<p>Not a comment on the EIS Guidelines.</p>
<p><a href="#">63</a></p>	<p>Jean-Yvon Landrac</p>		<p>Kincardine se trouve être en bordure du lac Huron. La région des Grands Lacs est comme son nom l'indique une région riche en eaux, au moins en eaux de surface. L'eau étant plus lourde que l'air, elle s'infiltré à travers les fissures et fractures, d'autant plus facilement que la pression est forte, or rien ne garantit que Kincardine ne sera pas un jour sous les eaux.</p> <p>Un projet de stockage profond sur la commune de Kincardine réunit donc des conditions très "favorables" à une catastrophe.</p> <p>Comparons ce site avec celui d'Asse II, site de "recherche" sur l'enfouissement situé en Allemagne (Braunschweig/Brunswick). Comme lui il est situé près d'une frontière, permettant de diviser par 2 l'irradiation soumise à la population de l'état originaire des déchets. Notons que l'irradiation totale n'étant pas fonction de la nationalité, ceci ne peut être un critère acceptable de choix du site.</p> <p>Notons de plus que les frontières évoluent au fil des temps : alors que lors qu'il était en</p>	<p><b>English:</b> Comment does not request changes to the EIS Guidelines.</p> <p><b>French / Français :</b> Les commentaires ne requièrent pas de changements aux Lignes directrices pour la préparation de l'Énoncé des incidences environnementales.</p>

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			<p>service, le centre d'Asse II se trouvait à la frontière entre l'Allemagne de l'Ouest et l'Allemagne de l'Est, suite à la réunification il s'est retrouvé au cœur de l'Allemagne.</p> <p>Similitude de déchets à enfouir : le site d'Asse II a reçu des déchets faiblement et moyennement radioactifs, c'est-à-dire similaires à ceux que certains projettent d'enfouir à Kincardine.</p> <p>Le site d'Asse II est situé dans une ancienne mine de potasse et de sel gemme. L'argument étant une "garantie de non-circulation d'eau" (1) du fait de la présence de sel. Jusqu'en 1988, seuls les antinucléaires annonçaient la présence d'eau. Depuis 1988, 12 m<sup>3</sup> d'eau entrent chaque jour dans la mine... sans que la source exacte ne soit trouvée (2). Depuis quelques mois (mais l'information n'a fuit que le 10 juin 2008), cette eau est contaminée en césium 137, radionucléide artificiel. En effet 220 litres par jour d'eau radioactive sont pompés au niveau des cavités à -750 m au niveau desquelles se trouvent des déchets nucléaires.</p> <p>Il est peu probable qu'il s'agisse des suites des retombées de tests nucléaires atmosphériques ou de Tchernobyl, étant donné que l'essentiel de l'eau, pompée au dessus de ce niveau (à -490 m si ma mémoire est bonne), n'est pas radioactif. Si tel était le cas, cela montrerait au demeurant la facilité du passage de l'air libre au fond de la mine (les cavités à -750 m sont parmi les plus profondes, hormis une galerie de tests creusée plus profondément) : la notion de barrière géologique aurait montré sa piètre pertinence, ce qui au demeurant est compréhensible : pour y enfouir les déchets et avant pour exploiter la mine, l'homme bouscule les conditions géologiques qui prévalent avant à l'enfouissement.</p> <p>Il s'agit donc très probablement d'une contamination due au stockage de déchets, c'est d'ailleurs l'avis du ministre allemand de l'environnement (3). Ce qui veut dire que les fûts sont probablement déjà détériorés, ce qui n'est guère étonnant vu les méthodes utilisées : afin de limiter l'exposition des manutentionnaires, après avoir essayé l'empilement horizontal et l'empilement vertical, ils ont choisi le stockage "en vrac", en déposant en vrac les déchets par une trémie ou en les poussant au bulldozer, cf. S&amp;A1979-Asse2.jpg.</p>	

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			<p>La littérature de l'époque disait que "des déchets nucléaires d'activité faible et moyenne sont disposés dans une ancienne mine de sel à Asse en Allemagne fédérale où ils sont surveillés électroniquement" (1).</p> <p>Pis, officiellement des barrières géologiques supplémentaires (béton de sel) ont été ajoutées. Ce qui voudrait dire que ces barrières elles-aussi n'auraient pas permis de ralentir notablement la pollution radioactive.</p> <p>Il n'aura pas fallu 30 ans pour que l'eau soit contaminée par les déchets radioactifs.</p> <p>Le 29 mai 2008, les antinucléaires ont rendu public les calculs effectués par le service allemand de radioprotection (Bundesamtes für Strahlenschutz) en septembre 2007 : le BfS considère que des relargages de gaz radioactifs auront lieu d'ici 150 dans l'atmosphère. A cette époque (septembre 2007), le BfS n'avait pas fait l'hypothèse que les déchets baignaient déjà dans l'eau.</p> <p>A noter qu'il s'agissait d'un centre de recherche, donc sans contraintes financières fortes poussant à faire au plus moins cher. Un centre de stockage en vraie grandeur serait encore moins sûr.</p> <p>Avant, avec plus ou moins de bonne fois on pouvait dire que l'on ne savait pas. Aujourd'hui enfouir les déchets radioactifs est au moins moralement une activité criminelle.</p> <p>Étant ingénieur des mines et non juriste de formation, je ne suis pas en mesure de savoir si autoriser un tel acte est vu comme complicité d'un crime contre l'humanité.</p>	
<p><a href="#">142</a></p>	<p>Gregory Zimmerman</p>		<p>As a US citizen, I am not in a position to comment on the internal affairs of the regulatory process for Canadian projects, but as a citizen of the Great Lakes, that precious and unique water body we share, I do feel that I can comment on proposed project in general terms.</p> <p>Agencies and residents on both sides of the multinational border (US, Canada and First Nations/Tribal jurisdictions) are presently working very hard to remediate previous</p>	<p>Comment does not request changes to the EIS Guidelines.</p>

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			<p>pollution. Millions of dollars have been spent to try to restore the ecological integrity of the Great Lakes. It would be a real shame if all that money were to be wasted because of new pollution added to the system. It would be a real shame if activities on one side of the boundary caused loss of ecological integrity on the other side of the river. We're presently wrangling with such multinational problems on the St. Marys River here in the Sault area. It is very difficult to work across those boundaries to fix past problems. Let's not leave a legacy of such problems for future Great Lakes residents. You can ask the Public Utilities Commission of Sault Ontario about the difficulties if you're not familiar with the case.</p>	
			<p>In summary, I'm only asking that during the plan review, EIS, and other approval processes, you find a way to incorporate all stakeholders regardless of which jurisdiction they reside in. There are multinational stakeholder groups, such and the Public Advisory Councils for the Great Lakes Areas of Concern and for the Lake wide Management Plans and for the Fisheries Task Groups that provide excellent models for how to do multinational stakeholder consults. The Ministry of Environment, Environment Canada, Ministry of Natural Resources, Department of Fisheries and Oceans all could provide examples to learn from.</p> <p>I encourage your agency to ensure that the multinational nature of this irreplaceable and precious resource be respected.</p>	<p>No change made to the EIS Guidelines. The <i>Canadian Environmental Assessment Act</i> does not exclude public outside Canada. The EIS Guidelines require that the proponent describe public participation opportunities for non-Canadians.</p>
<p><a href="#">84</a></p>	<p>Interested Parties</p>		<p>Resident from St. Clair County Michigan U.S.A.</p> <p>Cannot believe that your Ontario Power Company would want to even consider putting such a storage facility near the "BIGGEST" Fresh Water Source in the World. This is were Ontario gets it's Water from too!</p> <p>If ever, there was an accidental spill or leakage it would contaminate the Water that not only that supplies Port Huron &amp; Sarnia Ontario but all of South-eastern Michigan!</p>	<p>Comment does not request changes to the EIS Guidelines.</p>

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			<p>The Detroit Water Works takes in Water from Lake Huron just North of Port Huron which serves almost all of South-eastern Michigan including the Detroit Metro Area. And this proposed site is just 112 Miles up-stream and 1 Mile in-land from this area.</p> <p>Does not understand how such a reckless plan for both our countries could be even be considered. Vacant land in other areas such as northern Ontario or other provinces were the population is spare and the water supply is not threatened should be considered.</p>	
<a href="#">31</a>	Kathy Wyborski		<p>The proposed nuclear repository, designated for the Kincardine, Ontario area, woefully lacks insight in it's chosen geographical location. History shows that underground repositories leak, i.e. Hanford Nuclear Repository, Washington State, U.S.A.</p> <p>To propose such a facility to be located on the coast of Lake Huron, indicates that the concerns for ground water contamination is void in consideration of location. The historic prospective indicates that you must assume that there will be corrosion and leakage eventually in these types of facilities, and eventually, migration of such leakage will make it to the great fresh water basin of Lake Huron.</p> <p>As is common place in choosing locations for nuclear repository, you build far inland, away from highly populated areas and abundant water supplies.</p> <p>I am against construction and development of this facility, for environmental reasons, and we, as sharers of this important body of water for both nations uses, I respectfully urge your agents to eliminate coastal water areas in consideration for sites of this category of construction, in favour of more stable areas, that are far from the threat of contamination of these extremely important resources of the present and future.</p>	Not a comment on the EIS Guidelines.
<a href="#">110</a>	Lois M. Banks		<p>Urges the Government of Canada to stop this project.</p> <p>The billions of dollars for the project should be invested in sustainable, free energy from the sun and wind. The United States is going forward with a switch over to sustainable energy. The Canadian Government is lagging behind.</p>	No change. Not a comment on the EIS Guidelines.

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			<p>Canada is a wonderful country with a huge ecological footprint. This cannot be sustained. Let’s change that.</p> <p>Urges the government to move forward with switching every household to solar and wind.</p>	
<p><a href="#">27</a></p>	<p>Stephanie Warkentin</p>		<p>I wish to comment on the proposed nuclear waste facility in Bruce County.</p> <p>I have watched the lakes being compromised over the years due to overfishing, pollution, water exports, and invasive species. Never before have I heard of a worse idea than compromising the safety of the largest freshwater reserve in the world!!!! Especially in light of the climate crisis and the inevitable toll this will take on water availability and water quality, I cannot imagine what anyone would possibly be thinking when they proposed such a waste deposit area anywhere near this watershed. Even the smallest contamination would be completely unacceptable.</p> <p>Most people don’t even want the nuclear plants, let alone the waste. The so-called “clean nuclear energy” commercials for Ontario Hydro with the lovely white clouds and laundry blowing in a radioactive breeze made me want to vomit. How could my government take my tax money and then use it to subsidize such a misleading campaign? Not my Canada. Surely not.</p> <p>The number of people that would be affected by the effects of such a nuclear waste dump is ridiculously large, and add the wildlife to this and you have the largest environmental disaster we’ve ever seen. I cannot fathom why Ontario Hydro is refusing to see that people do not want nuclear power, and why they don’t turn to more green resources rather than wasting piles of money on a crusade to beat an old dead horse. Building more of what is already not wanted is stupidity, and is driving more people like myself to simply produce our own power and get off the grid and be rid of these bad decisions. I have friends that have already done so, and frankly I can’t wait to do the same. We don’t want any part of this insanity.</p> <p>Local environmental groups and Great Lakes conservation societies are never going to</p>	<p>Comment does not request changes to the EIS Guidelines.</p>

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			<p>stand for this crazy stupid proposal. I know I won't. Please start thinking with your head and not your bank account.</p> <p>Green energy is profitable too, and if dollars is what you want, I suggest you look into the extremely efficient new solar panel technology that is coming out today. Build a solar plant. Make wind turbines some more room in your plans. We don't want this, we don't need this, and I have seen your arguments to say that we do. They don't hold water. Your inability to think outside your little radioactive box is going to cause a lot of very big problems for the future. If you can't dump it near your facilities, then you have to move it further away, but where? The shipping is dangerous too. I know!!! How about you stop producing the stuff and wake up to the reality of the fact that even the largest, well-padded bank account cannot help you if you have no healthy environment in which to spend it.</p> <p>Water is the next great commodity of the coming age, and it will make oil look cheap. We cannot afford your short-sighted calculations or to believe in a false sense of security. Even the best laid plans cannot take into account every possibility. There are just too many uncertainties with a climate on the edge of unprecedented changes. Freak storms, flash floods, and even earthquakes can make short work of any "secure" area. Unless you can guarantee beyond a shadow of a doubt that this freshwater wealth and national treasure will be safe, (no you can't), you can absolutely NOT go through with this proposal any further.</p> <p>Cease and desist and stop being such a liability to all who live within the great lakes watershed. These are my thoughts, and kindly take them into account along with the piles of mail you will be receiving on this subject, I am sure.</p>	
26	Interested Party		<p>I came across the news article which revealed a plan by the Nuclear Power Industry, with the sanction of the government of Ontario and the government of Canada, (Cabinets) to store "life form killing nuclear reactor wastes in the vicinity of a major water source for millions of humans."</p>	<p>Comments do not request changes to the EIS Guidelines.</p>

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			<p>Trite but worthy of repeat, countless scientists involved with uranium these past two hundred odd years have come to the same conclusion: "Humans to date, have not evolved to a point in their evolution, where they have the mental, physical or spiritual capacity to deal responsibly with uranium - the black rock of death".</p> <p>We can clearly see this truth revealed through media statements attributed to the positions of the Ontario and Canadian Governments, relative to the nuclear power and nuclear development industry.</p> <p>We must always be mindful, in times when humans are faced with challenges to their "accustomed comfort cave", that humans revert and respond with a "me myself and I survival attitude". We need energy - we can't afford oil and gas, is the solution to embark on the killing path of investing in more nuclear reactors, and producing more deadly nuclear reactor waste? We can't even figure out how to store the spent fuel for the next thousands of years.</p> <p>Canadians, wherever they reside in whatever province, share a common social order evolved over centuries. We have adopted in Canada, fundamental truths, beliefs, laws, and expectations of a Governments. Governments can't abrogate or derogate from those realities. No matter how they try - the rule of law applies to all members of Government, as do the tenants of peace, order and good government, with a belief in a supremacy of a God.</p> <p>In the realm of Environment, the will of Canadians was expressed in an Act of Parliament which we also pronounced to the world: "The Government of Canada is committed to exercising leadership within Canada and internationally in anticipating and preventing the degradation of environmental quality and at the same time ensuring that economic development is compatible with the high value Canadians place on environmental quality".</p> <p>The NWMO, reported that there is a lot to determine in a transparent way, before any disposal of nuclear reactor waste occurs in Canada.</p>	

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			<p>Who gave the Cabinet authority to govern against the supremacy of moral values, against the rule of law, against peace, order and good government for the People. A few nuclear reactor owners does not constitute the Peoples of Canada.</p> <p>Most assuredly the First Minister of Ontario must know that he is not above the law, then why does he consider actions which put at peril the lives of millions of humans now and into the long future.</p> <p>Why do leaders in crises, embark on, "mindless, desperate and unconscionable vehicles" in the hope of arriving at solutions? Why do they assume a power, an authority and make decisions on the fate of the lives of millions of humans, without legal authority, power or right?</p> <p>The ultimate right to life rests with the Peoples — even in a Federal Parliamentary System of governance, the right to life, is a fundamental right of Canadians. Political Leaders or of their Governments, can't unilaterally take that away, or play with it.</p> <p>The First Minister of Ontario and the Prime Minister of Canada do not have that power, authority or right to change Canadians Values about environmental quality. The decision rests as it has always, with the People — with Canadians.</p> <p>If millions want the First Minister of Ontario or the Prime Minister of Canada to have the power over the life and death of Canadians, or the power to knowingly degrade the quality of the environment, or to denounce the high value which Canadians place on their environment, then that power, authority and right would have to be clearly expressed in an Act of Parliament. No Act of that nature exists.</p> <p>The First Minister of Ontario and Mr. Prime Minister of Canada have the responsibility to demonstrate leadership for Canadians — demonstrate leadership for everyone's environment and everyone's right to life now and into the future.</p> <p>The plans of a few desperate nuclear reactor executives to rid themselves of their legacy of death stored on their sites, or the jump on the wagon scramble to use the most expensive and most dangerous fuel and technology known to human kind, are desperate</p>	

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			<p>acts, which will result in dire consequences - that has, is, and will always be the result as revealed by the short history of humankind, when something new is upon humanity.</p> <p>Do not bury the nuclear reactor wastes anywhere in Canada.</p> <p>Five football fields, of nuclear fuel waste is the price which the nuclear industry has to pay for use of this fuel. Educate the executives to realize that you can't bury it to be some sort of "out of site out of mind thing". It is real. Live with it.</p> <p>You created this deadly waste once you knowingly used the fuel rod in a reactor to create energy for money. The fuel rod in turn fissioned itself into hundreds of different sisters of death, far deadlier for a far longer period of time, than the uranium ore which was mined on the health of miners and communities living by the mines.</p> <p>That is a small price for Nuclear Reactor Executives to also pay, when they join the big game of "uranium and the nuclear energy, and nuclear spent fuel waste". That is part of the risk factor - a cost of doing business with a deadly substance. Hold on to the waste in your pocket, in a cupboard, in a tank, in a vault, whatever but keep it on your site.</p> <p>You bought it, you used it, you keep its waste, and you are responsible for it. Learn to live with that.</p> <p>And for the First Minister of Ontario and the Prime Minister of Canada, or any of their processes assembled to "shop the regulatory voids for inaction", challenger them with a with a civil and criminal suit.</p> <p>They are acting outside their legal authority within the Canadian Federation and our Parliamentary system of governance. No one in Canada has a right to endorse an activity which they know will kill millions of Peoples, today or in time. It is a crime against humanity, their own citizens, the Peoples of Canada.</p> <p>Is there a difference, between a leader or agency supporting the burying of nuclear waste near Lake Huron's water source, than an agency or a leader elected to govern for People's health, life, well being, and values for environmental quality, which decide to</p>	

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			sprinkle a few grains of arsenic over a period of time into a public water well used for drinking, knowing that eventually those citizens, Canadians who consume the water will die. No one has that right in Canada.	
<a href="#">139</a>	Interested Party		<p>Expressed opposition to the DGR</p> <p>Suggests switch to natural sources of energy. Why endanger human and the planet's health with nuclear power.</p> <p>Canada should learn from European countries and California and tread carefully and learn to learn the planet with respect rather than defiling it.</p>	Not a comment on the EIS Guidelines.
<a href="#">25</a> and <a href="#">141</a>	Rob Kempert		I have recently read about the proposed site near Kincardine, Ont. I have no problem with storing nuclear waste. We have to put it somewhere and it is obviously a very long term storage situation. My concern is how close the site is to Lake Huron. With radio active material, the possibility of it leaching into Lake Huron alarms me. This could have an effect on millions of Canadians and Americans, not to mention the environment, for hundreds of years. Canada has a huge land mass. Could they locate this site somewhere more remote with less potential for disaster?	Comment does not request changes to the EIS Guidelines.
<a href="#">23</a>	Interested Party		<p>I am writing today to state that I do NOT approve of the proposal to store nuclear waste anywhere in the Great Lakes area.</p> <p>I feel the proposal is unsafe, unwise, and a threat to the long term sustainability and viability of the Great Lakes. As a constituent who lives on Lake Erie, I have a vested interest in the safety and health of the entire region, as it is all connected. I feel that exposing such a unique and threatened water system to any level of nuclear waste is simply irresponsible.</p> <p>Please consider all aspects of this dangerous proposal and please take a socially and environmentally responsible stand by denying this proposed project, as well as laying the foundation for a nuclear free Great Lakes forever.</p>	Comments do not request changes to the EIS Guidelines.

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<a href="#">359</a>	David and Barb Corcoran		We do not want a Nuclear Waste Dump to contaminate our earth or our water table. This is unthinkable. Please consider the health of all the people and living things of the earth.	Not a comment on the EIS Guidelines.
<a href="#">173</a>	William Goetz (Mayor of South Bruce)		<p>Over 65,000 m<sup>3</sup> of low and intermediate level nuclear waste exists on the Bruce site. It is being safely managed today but suggests that a long-term solution is required for future protection of the environment and the public. Council believes that the DGR is a viable solution for the long term.</p> <p>The nuclear industry plays an important role in Bruce Country and the country must help them meet their challenges, including the management of waste.</p> <p>The Municipality of South Bruce support moving forward with the DGR project in a timely manner.</p>	Comment does not request changes to the EIS Guidelines.
<a href="#">120</a>	Jeff Brackett		<p>I am very concerned about the formation of the independent panel that will be appointed to review and make recommendations regarding the two above mentioned environmental assessments.</p> <p>It was my hope that these environmental assessments would see an independent panel, free of bias, set up to review these important issues. This is not to be the case since the draft Joint Review Panel Agreement gives the President of the Canadian Nuclear Safety Commission almost total control over the composition of the panel. As I understand it the CNSC President appoints two members of the Joint Review Panel and the third becomes a temporary member of the CNSC.</p> <p>The Canadian Nuclear Safety Commission can in no way imaginable be considered to be independent or non biased on these matters. This has been made painfully obvious with the removal of Linda Keen from her position as President of the CNSC, this following her attempts to bring the NRU reactor up to safety standards, a move which was out of step and in conflict with the Commission’s so called “arms length” overseer, the Federal Government of Canada.</p>	Comment does not request changes to the EIS Guidelines. The Panel will comprise independent members and not current members of the Canadian Nuclear Safety Commission. The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission.

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			<p>With Ms. Keen's removal came the federal appointment of Mr. Binder to the CNSC President's chair. If there was ever any question as to how Mr. Binder might establish some semblance of independence following the federal government's interference in the CNSC presidency, perhaps the following will shed some light.</p> <p>A few days ago I received a copy of a presentation made by the President of the CNSC to the Canadian Nuclear Society on June 4th of this year. You can view this presentation at the following link,  <a href="http://www.nuclearsafety.gc.ca/eng/newsroom/presentations/20080604_cns_toronto_e.pdf">http://www.nuclearsafety.gc.ca/eng/newsroom/presentations/20080604_cns_toronto_e.pdf</a></p> <p>Clearly the Canadian Nuclear Safety Commission is committed to facilitating a nuclear renaissance. It is absolutely unacceptable that the CNSC be positioned like the fox in the hen house, overseeing these two very important environmental assessments. An independent panel dominated by the Canadian Nuclear Safety Commission will make a total mockery of our Canadian Environmental Assessment process and will not do justice to all those concerned about the environmental impacts of building new nuclear reactors and a deep geologic repository on the shores of Lake Huron.</p> <p>Thank you for the opportunity to provide comments in this first Phase of the Environmental Assessment for these two projects. Please add me to your distribution list and keep me informed of future opportunities to participate in these important reviews.</p>	
<a href="#">93</a>	Anabel and David Dwyer		<p>As Michigan residents who live on the shores of Lake Huron, we urge you to recognize that we and many other Michigan residents live in the impacted area. Accordingly, we request that you extend the comment period and informational hearings to Michigan.</p>	<p>No change made to the EIS Guidelines. The <i>Canadian Environmental Assessment Act</i> does not exclude public outside Canada. The EIS Guidelines require that the proponent describe public participation opportunities for non-Canadians.</p>
			Request your panel be composed of independent persons in order to be fair and protect	Comment does not request changes to

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			our common environment from further radiological contamination.	the EIS Guidelines. The Panel will comprise independent members and not current members of the Canadian Nuclear Safety Commission. The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission.
			<ol style="list-style-type: none"> <li>1. The impacted area of this unprecedented proposed deep geological repository should be expanded to include Michigan and all communities in the Great Lakes Basin. Michigan, in particular, shares with Canada — and First Nation, Anishinaabek and other Indigenous Peoples — the responsibility and the fate for Lake Huron's international waters. Eastern Michigan shoreline is a mere 50 some miles from the access site for this proposed dump. Currently, local fisheries and local municipalities are listed as the only areas that could be impacted by this proposed dump. Great Lakes fisheries cannot be limited to one area, nor can waters and winds of the Great Lakes. Some storms move counter clockwise on Lake Huron. The Lake overturns twice each year, spring and fall. Great Lakes waters continuously move downstream and also evaporate to the air. Fisheries are a \$4 billion industry in the Great Lakes Basin. 40 million people get their drinking water downstream of this proposed dump. A serious accident or incident or significant leaks above or below ground at the site, could devastate Lake Huron and environs forever.</li> <li>2. The panel should be made up of members entirely independent of the nuclear establishment in Canada and should not include members of the Canadian Nuclear Safety Commission. As proposed currently, in the joint panel agreement, the Canadian Nuclear Safety Commission will appoint 2 of the 3 member panel. The Ministry of Environment, through the Canadian Environmental Assessment Agency, will choose 1 member of this panel. This is supposedly an independent environmental</li> </ol>	See response to CEAR 99..

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			<p>review panel, different from the environmental assessment completed in 2006, which was overseen by the Canadian Nuclear Safety Commission. To all appearances, the environment gets the short straw.</p>	
			<p>3. The comment period should be extended by at least 90 days to properly inform Great Lakes communities of this proposed repository, that could have grave effects on the Great Lakes forever. The Canadian Environmental Assessment Agency should hold informational meetings in Michigan. — The Canadian Environmental Assessment Agency held one informational meeting in Tiverton, near the proposed site. The meeting was cancelled twice, and one week’s notice of the meeting was given each time. Since this dump will be in service for millennia, it only stands to reason that this should not be a rush job.</p>	
<p><a href="#">86</a></p>	<p>Hal Newnan</p>		<p>Please extend the period of comments at least 90 days to allow full information and review of this project. Being a US citizen, I have not heard anything about this until about the last week. As, millions of people on both sides of the border depend on the Great Lakes for their drinking water and other uses it is crucial that their lives be placed at great risk of harm, even death, by a poor decision. Therefore, we strongly urge you to allow the extension and enable all stakeholders’ opportunity to express their views.</p>	<p>Comment did not request changes to the EIS Guidelines.</p>
<p><a href="#">114</a></p>	<p>Beyond Nuclear Signed by 548 intervenors</p>		<p>The proposal to build a deep underground dump (DUD) for radioactive wastes on the shoreline of the Great Lakes is unacceptable. Water is the most likely dispersal medium for toxic materials in general, and for radioactive wastes in particular.</p> <p>Nevertheless, that’s what is being considered at the Bruce nuclear complex on the Canadian side of Lake Huron. The DUD would be located just over one kilometre (less than one mile) from the Lake and would house all of the radioactive wastes from 20 commercial nuclear power reactors in Ontario — with the exception of the irradiated nuclear fuel.</p>	<p>Comment does not request a change to the EIS Guidelines.</p>
			<p>It was recently reported that the Canadian Nuclear Waste Management Organization</p>	<p>No change. The EIS Guidelines</p>

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			<p>(NWMO) wants to manage the DUD project. But the NWMO deals exclusively with the long-term management of irradiated nuclear fuel, and has nothing whatever to do with other categories of nuclear waste materials. Does the NWMO’s involvement mean that the proposed DUD will eventually become a permanent repository for high-level radioactive waste — making it the “Yucca Mountain” of the Great Lakes region?</p>	<p>require that low- and intermediate-level waste be assessed. The storage of nuclear fuel is beyond the scope of the EIS.</p>
			<p>The Bruce nuclear complex currently hosts nine reactors (one of them permanently shutdown), with proposals for four more. This would make it the largest nuclear power complex in the world. Already there are 500 outdoor silos for the “interim storage” of irradiated nuclear fuel about one kilometre from Lake Huron, and there are plans to build 2,000 more.</p> <p>Since the DUD is only 50 miles from Michigan across Lake Huron, leakage of radioactivity from the dump could directly affect tens of millions of residents of Michigan, Ohio, Pennsylvania and New York, and contaminate the drinking water in Port Huron, Sarnia, Detroit, Windsor, Toledo, Cleveland, Erie, Buffalo, Toronto and countless other communities downstream.</p>	<p>Comment does not request changes to the EIS Guidelines.</p>
			<p>Thus, this DUD proposal is not just a Canadian issue, but an international one. In 1986, Canada protested when the U.S. proposed a high-level radioactive waste dump in Vermont because it was too close to the Canadian border; that proposed dump was subsequently cancelled. Now it is time for U.S. residents to speak out. The Canadian DUD proposal sets a dangerous precedent for the establishment of perpetually hazardous facilities on the Great Lakes, and impacts people on both sides of the border.</p> <p>The successful emplacement of the DUD for so-called “low” and “intermediate” level radioactive waste from across Ontario — and potentially from the rest of Canada — will create a threat to the Great Lakes watershed for generations to come. It will also increase the likelihood of the Bruce site becoming a permanent disposal dump for high-level radioactive wastes (i.e., irradiated nuclear fuel), which would increase the risks by many orders of magnitude.</p>	

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			<p>Alarming as this proposal is, the process for assessing its environmental impact is also cause for grave concern. In Canada, environmental panels reviewing proposed nuclear facilities have also been independent of the nuclear establishment — until now. But for the DUD, the Government of Canada intends to place the review panel under the control of the Canadian Nuclear Safety Commission (CNSC) which is the regulatory authority for licensing nuclear facilities in Canada.</p> <p>Six months ago, the President of the CNSC was fired by the Canadian federal government for being too strict in her enforcement of reactor safety regulations. The new CNSC President has clear instructions to fast-track all nuclear regulatory approval processes. No environmental assessment panel will be credible if it is dominated by this politicized regulatory agency.</p> <p>Despite the conflict of interest, the CNSC stands ready to chair the environmental assessment panel and to fill two of its three positions. CNSC’s domination of the Full Panel Review is unprecedented and will undermine the panel’s credibility. We urge CNSC’s exclusion from the Panel, so the panel’s independence is assured.</p>	<p>Comment does not request changes to the EIS Guidelines. The Panel will comprise independent members and not current members of the Canadian Nuclear Safety Commission. The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission.</p>
			<p>We ask that the public comment deadline be extended for six months beyond June 18th. Given the longevity and the unprecedented nature of the hazard that the DUD represents for the entire Great Lakes ecosystem, as well as the minimal outreach to the United States and Native American/First Nations that the Canadian federal government has undertaken, this extension request is reasonable.</p>	<p>Comment does not request changes to the EIS Guidelines. Further, the <i>Canadian Environmental Assessment Act</i> does not exclude public outside Canada. The EIS Guidelines require that the proponent describe public participation opportunities for non-Canadians.</p>
<a href="#">43</a>	Iain Campbell		<p>I am writing as a resident of Grey County living less than an hour's drive from the Bruce Nuclear facility where the proposed Nuclear Waste dump would be located. I strongly</p>	<p>Not a comment on the EIS Guidelines.</p>

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			<p>object to this development, and specifically to the inclusion of the presence of the Canadian Nuclear Safety Commission on the assessment panel. This will clearly bias the panel in favour of the nuclear lobby, who have already been sending their glossy, well funded and misleading propaganda to my home.</p> <p>Rest assured that there will be significant public outcry from both sides of the border if this project is approved. The risks are incalculably large, and the process of review cannot in any way be compromised by the presence of a voice for the nuclear establishment such as the CNSC.</p>	
24	Interested Party		<p>These are my public comments about the Deep Geologic Repository Project.</p> <p>I have been to the Bruce Peninsula region and have talked with residents. It is my understanding there is a radioactive waste dump already on that site. Residents believe that the dump was been leaching out for years and has contaminated local groundwater.</p> <p>The plans the Ontario Power has for burying radioactive waste into holes drilled into rock near the shore of Lake Huron are nothing less than nuclear madness.</p> <p>The Great Lakes region is at this time experiencing earthquakes. How can you be sure that there are not fault lines deep with the earth that will not break open the holes you intend on drilling?</p> <p>The core sample you save in the lab can hardly be compared to what is under the earth and is subject to tremors, water pressure/gravity, heat and earthquakes.</p> <p>It is ridiculous to have student engineers handling such an important project. For example, experiments to see if cold temperatures or adding chemicals to water will contain future spills is total madness. Such a chance of the magnitude of such radioactive contamination should not be taken in the first place. It is indicative of the possibility (and anticipation of) of a great disaster in connection with this repository. To operate in such a manner is unethical. To use students for this type of research is immoral.</p> <p>The only ethical and sane recourse is to put a moratorium on the project and the</p>	<p>Comment does not request changes to the EIS Guidelines.</p>

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			production of nuclear waste. We must not risk the future of this planet for the expediency of the present time when there are too many risk factors involved.	
<a href="#">19</a>	Interested Party		<p>I am writing to express my concern over the Canadian Nuclear Safety Commission’s presence on the panel to investigate the building of an underground radioactive waste dump one kilometre from the shores of Lake Huron. The presence of the Canadian Nuclear Safety Commission will taint this supposed independent panel — a panel whose members should not be involved in promoting, defending, or licensing nuclear facilities.</p> <p>The nuclear regulator has never had a seat on a panel for environmental assessments before, and their role in this one could set a dangerous precedent, downplaying the dump’s radiological risks to health and the environment.</p> <p>I hope that before such a potentially hazardous decision is made, one that could affect the health of all the water in the Great Lakes system, that the panel weighing the options is truly independent.</p>	Comment does not request changes to the EIS Guidelines. The Panel will comprise independent members and not current members of the Canadian Nuclear Safety Commission. The Joint Review Panel will be an independent panel appointed by the Minister of the Environment and the President of the Canadian Nuclear Safety Commission.
	The Lawyer’s Committee on Nuclear Policy (Anabel Dwyer)		The impacted area of this unprecedented proposed deep geological repository should be expanded to include Michigan and all communities in the Great Lakes Basin.	No change. Spatial boundaries can be adapted to encompass Great Lakes if it is determined that there are environmental effects.
	A. Norton		<p>Expressed opposition to project given proximity to Great Lakes.</p> <p>Confirmed that the Detroit, Water Works takes in Water from Lake Huron just North of Port Huron which serves almost all of South-eastern Michigan including Detroit Metro Area and the proposed site is just 112 Miles up-stream and 1 Mile in-land from this area.</p> <p>Expressed view that proposal is a reckless plan for both countries.</p>	Not a comment on the EIS Guidelines.
	Don’t Waste Michigan Sherwood Chapter		Expressed view that the radioactive waste dump already on the site has been leaching for many years.	Not a comment on the EIS Guidelines.

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	(Kathryn Barnes)		<p>Expressed concern, given earthquakes in the region, that fault lines deep within the earth that will not break open the drilled holes; and core samples cannot compare to what is under the earth that is subject to tremors, water pressure/gravity, heat and earthquakes.</p> <p>Expressed concern with experiments to see if cold temperatures or adding chemicals to water will contain future spills.</p> <p>Requested a moratorium on the project and the production of nuclear waste given the risk factors.</p>	
	Linda Wilson		Expressed opposition to nuclear plants in Ontario, the north shore, Manitoulin, Canada and the world.	Not a comment on the EIS Guidelines.
	Bob McKay		Expressed view that nuclear energy EA is a joke given renewable and safe technologies.	Not a comment on the EIS Guidelines.
	Dean Freck		Expressed concern with proposal given that is within a quarter mile of some of our planets greatest amounts of fresh water; suggested moving site to Canadian hinterland.	Not a comment on the EIS Guidelines.
	Shawn Arscott		<p>Expressed view that nuclear energy, all stages included, result in disastrous contaminations being left behind where ever they operate.</p> <p>Expressed view that Port Hope, even after the \$21 million Cameco says it'll take to clean up will not be contaminant free.</p>	Not a comment on the EIS Guidelines.
	Dr. Mark Smith		Public money invested in nuclear energy gives the industry an unfair advantage over other ways of generating power, increasingly attracting more financing in the same thing. This prevents financial resources from being channelled into the development of other forms of energy generation such as solar, wind, use of household and industrial waste, and fossil fuels used in conjunction with carbon sequestration.	Not a comment on the EIS Guidelines.

**ACRONYMS:**

CEAA : Canadian Environmental Assessment Agency  
EIS: Environmental Impact Statement  
NCWC : National Council of Women of Canada  
OPG: Ontario Power Generation  
DGR: Deep Geologic Repository  
L&I-LW: Low- and Intermediate-Level Waste