

# **CANADIAN ASSOCIATION OF NUCLEAR HOST COMMUNITIES (CANHC)**

## **Submission on the Draft Integrated Tailored Impact Statement Guidelines and Draft Public Participation Plan**

### **New Nuclear at Wesleyville Project**

## **1. Introduction**

The Canadian Association of Nuclear Host Communities (CANHC) appreciates the opportunity to provide comments on the Draft Integrated Tailored Impact Statement Guidelines (ITISG) and Draft Public Participation Plan (PPP) for the proposed New Nuclear at Wesleyville Project.

CANHC represents municipalities across Canada that host, or are considering hosting, nuclear facilities. Our perspective is grounded in decades of municipal experience supporting nuclear projects across their full lifecycle, including planning, operations, refurbishment, decommissioning, and long-term stewardship.

CANHC does not take a position on the merits of this specific project. Rather, this submission focuses on whether the federal impact assessment framework is structured in a way that adequately reflects the realities, responsibilities, and needs of nuclear host and neighbouring communities.

This submission reflects system-level observations based on the collective experience of CANHC member communities and is not intended to speak to site-specific positions of individual municipalities.

CANHC appreciates getting funding through the Impact Assessment Agency's participant funding program.

### **1.1 Understanding the Scope of the Impact Assessment**

It is important for municipal participants to clearly understand the scope and role of the federal impact assessment process under the *Impact Assessment Act*.

While the framework refers broadly to environmental, health, social, and economic effects, the assessment is fundamentally structured around the identification and mitigation of adverse effects within federal jurisdiction, as well as direct or incidental effects under the Act.

In practice, this means that many of the impacts most directly experienced by host and neighbouring municipalities—such as pressures on housing, infrastructure, emergency services, health systems, and municipal governance capacity—may be generally described within the Impact Statement, but are **not** always positioned to ensure they are fully assessed, mitigated, or subject to follow-up and monitoring within the process.

**There is a risk that the breadth of language used in impact assessment documentation creates an expectation that all socio-economic and community-level impacts will be fully addressed through the federal process.** CANHC’s experience indicates that this is not always the case, particularly where impacts do not clearly align with federal jurisdiction.

This distinction is critical. Municipalities should not assume that all locally relevant impacts will be comprehensively addressed through the federal impact assessment process alone.

## **2.0 Key Federal Consideration: Community Readiness and the Integrated Safety Case**

For nuclear projects, the relationship between community capacity and federal oversight is direct and material.

**Community Readiness is a critical determinant of whether a nuclear project can proceed in a safe, credible, and implementable manner, and should be explicitly treated as a federal consideration informing both the impact assessment and the CNSC safety case.**

While nuclear safety is often framed in technical and regulatory terms, the effective implementation of that safety framework depends on systems and capacities that extend beyond the facility itself and into the communities in which it is located.

### **2.1 Municipal and Regional Systems as Part of the Federal Safety Framework**

Municipal governments and neighbouring communities are responsible for delivering core components of the broader safety system, including:

- off-site emergency management and coordination
- policing, fire protection, and public safety
- transportation infrastructure and evacuation routes
- regional health system capacity
- municipal drinking water and wastewater servicing
- housing and workforce accommodation

- public communication and trust in authorities

These are not peripheral or indirect considerations. They are operational dependencies that underpin the ability of a project to meet federal objectives related to the protection of health, safety, and the environment.

## **2.2 Link to the CNSC Mandate**

As the federal lifecycle regulator, the CNSC is responsible for ensuring that nuclear facilities are designed, constructed, and operated in a manner that protects health, safety, and the environment. In practice, this responsibility relies on the effective functioning of municipal and regional systems that support emergency response, infrastructure resilience, and public communication.

Without adequate municipal capacity and coordination, these systems cannot be assumed to function as required. As such, Community Readiness is directly relevant to the credibility and completeness of the federal safety case.

## **2.3 Implications for the Integrated IAAC–CNSC Process**

The integrated IAAC–CNSC process is intended to support a “one project, one review” approach, bringing together federal impact assessment and nuclear regulatory considerations.

In this context, factors that underpin the CNSC safety case must be appropriately identified and assessed during the impact assessment phase. Community Readiness is one such factor.

If municipal and regional capacity, infrastructure readiness, and emergency systems are not assessed early, gaps may only emerge at later licensing stages, creating risks to project timelines, regulatory confidence, and public trust.

## **2.4 Regional and Neighbouring Community Dependencies**

CANHC emphasizes that Community Readiness extends beyond the host municipality.

Nuclear projects rely on regional systems and neighbouring communities for:

- emergency management coordination
- hospital and health system capacity
- transportation and evacuation planning
- workforce housing and social infrastructure

In many cases, neighbouring municipalities may play important supporting roles in regional systems, even where they are not formally identified as host communities. The extent of these

roles will vary by project and region, but should be clearly identified early and assessed where relevant. Assessing readiness in isolation at the host level does not reflect the realities of how nuclear systems function in practice.

## 2.5 Gap in the Current Guidelines

The Draft Integrated Tailored Impact Statement Guidelines and Public Participation Plan do not explicitly require an assessment of Community Readiness, nor do they clearly identify host and neighbouring municipalities as distinct participants with operational responsibilities.

While references to socio-economic and infrastructure considerations are included, they are not structured in a manner that ensures they are assessed as federal decision-relevant factors tied to project viability and the safety case.

## 2.6 CANHC Position

CANHC submits that Community Readiness must be explicitly integrated into the assessment framework as a federal consideration informing both the impact assessment and the CNSC safety case.

This requires:

- formal recognition of Community Readiness as a **Valued Component** or equivalent cross-cutting requirement
- explicit assessment of municipal and regional capacity and dependencies
- early and structured engagement with both host and neighbouring municipalities
- clear identification of how municipal systems will support the safe implementation of the project

Without this, the assessment risks advancing a project framework that may satisfy technical requirements, but does not fully demonstrate that the project can be implemented safely, credibly, and sustainably in real-world conditions.

## 3. Additional Overarching Observations

CANHC has identified additional systemic concerns:

1. **Municipal governments are treated as members of the public**, despite having implementation responsibilities.
2. **Neighbouring municipalities are not clearly identified or scoped**, despite likely operational roles.

3. **Socio-economic impacts risk being under-assessed**, particularly where not tied to federal effects.
4. **The process emphasizes participation, not engagement**, limiting meaningful municipal input.
5. **A gap exists between IAAC scope and CNSC safety realities**, particularly regarding community readiness.
6. **The integrated IAAC–CNSC process is not clearly explained**, particularly regarding licensing stages and decision points.

## 4. Review of the Draft Integrated Tailored Impact Statement Guidelines (ITISG)

### 4.1 Scope Limitation – Federal Lens

While the ITISG references environmental, health, social, and economic effects, the structure of the Guidelines—grounded in federal effects—does not ensure that municipal-level impacts will be fully assessed, mitigated, or monitored.

Municipal impacts risk being:

- described, but not decision-relevant
- identified, but not mitigated
- acknowledged, but not followed up

As outlined in Section 2.0, this creates a gap between the scope of federal assessment and the factors that determine whether a nuclear project can be implemented safely and credibly in practice.

If adverse impacts to host communities are not addressed through the federal impact assessment process, it will be up to the host municipality if they wish to address the impact and financially support items through the local property tax base.

### 4.2 Socio-Economic and Infrastructure Gaps

The Guidelines do not clearly require assessment of:

- housing demand and affordability
- infrastructure capacity (roads, water, wastewater)
- workforce and population pressures
- municipal service delivery (fire, policing, social services)
- regional health system capacity

These are core municipal realities.

**These factors directly influence whether communities have the capacity to support project implementation and sustain operations over time. Without a structured requirement to assess these impacts, the Impact Statement may not provide sufficient information to determine whether the project can be implemented in a manner consistent with federal objectives related to health, safety, and the environment.**

In the absence of this information, key pressures may only emerge at later stages, when mitigation options are more limited and risks to project timelines and public confidence are increased.

### **4.3 Municipal Governance and Capacity**

There is no structured requirement to assess:

- municipal governance capacity
- long-term administrative burden
- inter-municipal coordination
- regional system dependencies

Municipal governments are responsible for implementing and sustaining many of the systems that support nuclear operations, including emergency management, infrastructure oversight, and public communication.

Without a clear understanding of municipal governance capacity, it is not possible to determine whether these responsibilities can be effectively carried out over the lifecycle of the project.

As outlined in Section 2.0, this information is necessary to inform both the impact assessment and the broader federal safety case, particularly in an integrated IAAC–CNSC process.

### **4.4 Emergency Management and Regional Systems**

Emergency management is referenced but not structured to:

- assess municipal and regional capacity
- identify resource gaps
- clarify responsibility between host and neighbouring communities

These decisions must occur early.

Emergency management is a core component of the nuclear safety framework and a key consideration in CNSC licensing. As such, assumptions regarding emergency response systems

must be established early in the assessment process to inform whether the project can be safely implemented.

For example:

- Will emergency management rely on regional systems (e.g., Northumberland Region)?
- Will hospitals in neighbouring municipalities be used?
- Will infrastructure be expanded or newly created locally?

**These are not implementation details. They are foundational assumptions that determine the feasibility of the safety case and the readiness of the broader system to respond in the event of an incident.**

If these issues are not raised and considered at the impact assessment stage, they may only emerge during licensing, creating uncertainty, delays, and potential gaps in preparedness.

## 4.5 Community Readiness Gap

There is no requirement to assess:

- regional readiness
- dependency on neighbouring municipalities
- integration of municipal systems into the safety framework

This is a critical omission.

As outlined in Section 2.0, Community Readiness is a critical determinant of whether a nuclear project can proceed in a safe and implementable manner.

Without explicit assessment of these factors, the Impact Statement cannot fully inform the assessment or clearly demonstrate that the project can be supported by the communities responsible for its implementation.

## 4.6 Integrated Process and CNSC Licensing Clarity

The integrated IAAC–CNSC process is not clearly communicated.

The assessment appears to:

- inform a federal impact decision
- support CNSC consideration of a Licence to Prepare Site (LTPS)

However:

- the distinction between assessment and licensing stages is unclear
- the information required for future licensing phases is not transparent

- the role of municipalities in future CNSC processes is not well defined

This lack of clarity creates uncertainty regarding what decisions are being made at this stage, what information is required to support those decisions, and when municipal input will be considered in future licensing processes.

For municipalities, this limits the ability to plan, allocate resources, and participate effectively in a process that has long-term implications for community safety and infrastructure.

## **4.7 Authority Having Jurisdiction and Non-Nuclear Infrastructure**

CANHC would also like clarification on jurisdictional boundaries and authority having jurisdiction on the nuclear site.

While CNSC regulates nuclear facilities and substances, nuclear projects include substantial non-nuclear infrastructure, including:

- offices and administrative buildings
- warehouses and training facilities
- emergency response infrastructure

This raises a fundamental question: **Who is responsible for permitting, inspection, fire protection, and code compliance for non-nuclear buildings on all nuclear sites (as this is not consistently applied)?**

Municipalities are typically responsible for:

- building permits and inspections
- fire protection and fire code compliance
- land-use planning and servicing
- local emergency response

Clarifying authority having jurisdiction is essential to understanding how regulatory responsibilities will be shared between federal, provincial, and municipal governments, and how non-nuclear components of the project will be implemented and overseen.

Without this clarity early in the process, it is not possible to fully assess community readiness, infrastructure requirements, or the feasibility of project implementation.

This reflects a broader issue in the current framework, where municipalities are not consistently recognized as jurisdictions despite potentially having defined statutory responsibilities and implementation roles.

## **4.8 Municipal Capacity to Participate**

The Guidelines do not address the capacity of municipalities to participate effectively in the impact assessment process.

CANHC recognizes that, in some cases, host municipalities may have access to project-related resources or provincial support to assist with preparation and engagement. However, this is not consistent across all affected communities, and does not extend to neighbouring municipalities that may also bear significant operational and service-related responsibilities.

In particular, neighbouring municipalities may have limited access to formal funding mechanisms, including federal participant funding programs, as they are often classified as governments rather than participants, despite being directly impacted by project-related demands on infrastructure, emergency services, health systems, and regional coordination.

This creates an uneven and, in some cases, structurally constrained participation environment, where municipalities with critical roles in community readiness may not have the capacity to:

- review complex technical materials
- commission independent studies where needed
- engage effectively with proponents and regulators
- coordinate across regional and inter-municipal systems

This is particularly significant in the context of nuclear projects, where municipal and regional systems form part of the broader safety framework.

Without sufficient capacity across both host and neighbouring municipalities, the assessment may not fully capture the scope of community readiness required to support safe and effective project implementation.

CANHC submits that this issue warrants early consideration within the assessment process to ensure that all affected municipalities are able to participate in a manner that reflects their roles and responsibilities.

## **5. Public Participation Plan (PPP)**

### **5.1 Participation vs Engagement**

The PPP emphasizes:

- public information sessions
- comment periods

This reflects a participation-based approach.

**For nuclear host and neighbouring municipalities, this is insufficient.**

Municipal governments are not simply participants in the process. They are responsible for implementing and sustaining many of the systems that underpin project operations and the broader safety framework, including emergency management, infrastructure coordination, and public communication.

Building on the concept of community readiness for nuclear projects, host and neighbouring municipalities function as implementation partners in the broader safety framework, with defined responsibilities for emergency management, infrastructure, and public safety.

A partnership-based approach—similar in principle to that applied in Indigenous engagement—would better align with the responsibilities municipalities carry in supporting project implementation.

Without meaningful engagement, municipalities are limited in their ability to influence key assumptions, identify system dependencies, and ensure that local and regional realities are reflected in the assessment.

This has direct implications for the quality of information informing the credibility of the integrated IAAC–CNSC process.

## **5.2 Lack of Geographic Differentiation – Missing Municipalities**

The PPP does not clearly identify:

- host municipalities
- neighbouring municipalities
- regional service providers

Nor does it explain how proximity influences the consideration of input.

This is a significant gap. Without explicit recognition of host and neighbouring municipalities as distinct actors, the PPP does not reflect the partnership-based roles these communities play in supporting nuclear operations and the safety case.

Nuclear projects rely on systems that extend well beyond the project boundary. Municipalities in close proximity—particularly those with existing infrastructure, emergency management responsibilities, or regional service roles—may bear substantial operational responsibilities, even where they are not formally identified as host communities.

Without clear geographic differentiation, the PPP treats all input as functionally equivalent, regardless of the level of impact or responsibility.

This limits the ability of the process to appropriately weight input from those communities most directly involved in supporting project implementation and the safety case.

As a result, the assessment risks overlooking critical regional dependencies and mischaracterizing the distribution of impacts and responsibilities.

### **5.3 Timing and Access**

Engagement under the PPP occurs after key documents, including the Draft Guidelines, have been prepared.

**For municipalities, the issue is not that systems must be fully developed at this stage, but that key assumptions and dependencies must be identified early enough to inform the scope and content of the Impact Statement.**

Municipal input is essential to identifying and shaping how the following are assessed:

- emergency management structures and roles
- regional service dependencies (including neighbouring municipalities)
- infrastructure capacity and expansion requirements
- health system integration and regional impacts

These are not implementation details. They are foundational inputs that determine what must be studied, how impacts are assessed, and whether the project can be implemented in a manner consistent with federal safety objectives.

If these issues are not raised and considered early enough to influence the Impact Statement, there is a risk that the assessment will be based on incomplete or unrealistic assumptions regarding community readiness.

This may result in critical gaps only being identified at later stages of the process, including during panel review or subsequent CNSC licensing phases, when opportunities to adjust the scope of assessment are more limited.

Early engagement is therefore required not to finalize solutions, but to ensure that the right questions are asked, the appropriate studies are undertaken, and key municipal and regional dependencies are properly understood and assessed.

This includes timely access to information. In some cases, municipalities receive documentation at the same time as the general public, despite having governance responsibilities that require

internal review, briefing of councils, and coordination across departments and neighbouring jurisdictions.

In practice, this creates challenges in meeting timelines and limits the ability of municipalities to provide informed, coordinated input on complex technical matters.

CANHC notes that in other areas of the federal process, including Indigenous engagement, there are mechanisms to support earlier access to materials and iterative review of draft content.

A similar approach—appropriate to the role of municipalities—would better support meaningful engagement and improve the quality of information informing the Impact Statement.

## **5.4 Transparency and Accountability**

The PPP indicates that issues raised through engagement will be tracked and considered as part of the assessment process.

However, the level of clarity regarding how municipal input will be documented, considered, and responded to remains limited.

For municipalities, it is important to understand:

- how issues raised are formally recorded
- how they are incorporated into the Impact Statement
- how proponents are expected to respond to municipal concerns

This is particularly important in the context of nuclear projects, where municipal input often relates to community readiness, infrastructure capacity, and emergency management—factors that are foundational to the safety case.

CANHC notes that, in other areas of the federal process, including Indigenous engagement, there is a more structured approach to documenting issues, tracking concerns, and demonstrating how they have been addressed over time.

**A comparable level of clarity and structure for municipal engagement—appropriate to their roles and responsibilities—would strengthen transparency, support accountability, and reflect a more partnership-based approach to engagement.**

Where municipalities are expected to support implementation of project-related systems, there is a corresponding need for clear, traceable processes that demonstrate how their input has informed assessment outcomes and project assumptions.

## Concluding Observation

Taken together, these limitations in the Public Participation Plan constrain the ability of the assessment to fully capture and respond to the realities of community readiness, particularly where municipal and regional systems are essential to project implementation.

## 6. Recommendations

### 6.1 Core Recommendations

CANHC recommends the following overarching actions to ensure that the impact assessment framework appropriately reflects the role of municipalities and supports credible federal decision-making:

1. **Recognize Community Readiness as a federal consideration** informing both impact assessment and the CNSC safety case
2. **Establish a partnership-based municipal engagement approach**, reflecting the implementation roles of host and neighbouring communities
3. **Ensure early identification of municipal and regional dependencies**, so they can be properly assessed within the Impact Statement
4. **Clarify roles, responsibilities, and authority across federal and municipal systems**, including how municipal functions support project implementation

### 6.2 Specific Recommendations – Integrated Tailored Impact Statement Guidelines (ITISG)

CANHC recommends that IAAC:

#### Assessment and Scope

1. Require assessment of **Community Readiness for Nuclear Development**
2. Create a **Municipal Governance and Service Capacity Valued Component (or equivalent requirement)**
3. Require **host and neighbouring municipality-focused socio-economic and infrastructure studies**
4. Ensure that these factors are assessed in a manner that **informs federal decision-making and the CNSC safety case**

#### Integrated Process and Safety Case

5. Explicitly link **community readiness** to the CNSC safety case
6. Clarify the relationship between **IAAC decisions and CNSC licensing stages**, including expectations at the Licence to Prepare Site phase
7. Require early identification of **municipal and regional system dependencies** to inform the scope of the Impact Statement

### **Authority and Jurisdiction**

8. Clarify **authority having jurisdiction** for non-nuclear infrastructure on the nuclear site
9. Identify municipal roles in **permitting, fire protection, emergency response, and infrastructure oversight**
10. Recognize municipalities as **functional jurisdictions for engagement purposes**, reflecting their statutory responsibilities

## **6.3 Municipal Engagement (Public Participation Plan)**

CANHC recommends that IAAC:

1. Establish a **dedicated municipal engagement stream**, distinct from general public participation
2. Explicitly identify **host and neighbouring municipalities** within the engagement framework
3. Ensure engagement occurs **early enough to inform the scope and assumptions of the Impact Statement**
4. Provide **clear and structured mechanisms for tracking, responding to, and demonstrating how municipal input has influenced assessment outcomes**
5. Provide municipalities with **timely access to information**, including earlier access to materials where appropriate, to support informed participation

## **6.4 Municipal Capacity to Participate Meaningfully**

CANHC recommends that IAAC:

1. Support municipal capacity to **participate effectively in the assessment process**, including the ability to:
  - review complex technical materials
  - engage with proponents and regulators
  - coordinate across regional and inter-municipal systems
2. Ensure that **both host and neighbouring municipalities** have access to appropriate support to:
  - undertake independent analysis where required

- contribute informed input on community readiness, infrastructure, and emergency management

## 7. Conclusion

Community readiness must be understood as a foundational element of nuclear project viability and safety.

The integrated IAAC–CNSC process provides a critical opportunity to assess these factors earlier. Without explicit recognition and assessment of municipal and regional capacity—including both host and neighbouring communities—the assessment risks overlooking key dependencies that underpin:

- the safety case
- public confidence
- long-term project success

Impact assessments identify impacts; they do not manage them. For nuclear host communities, many of the responsibilities associated with managing and responding to project impacts ultimately rest with municipal governments—often without corresponding authority, recognition, or resources within the federal process.

In the context of an integrated IAAC–CNSC review for a federally regulated nuclear project, CANHC submits that municipalities **should not be treated solely as members of the public where they have defined statutory responsibilities, implementation roles, or operational functions that directly support the safety framework and project viability.**

Recognizing municipalities as functional jurisdictions for engagement purposes would better reflect the realities of nuclear project implementation and strengthen the credibility, transparency, and effectiveness of the federal assessment process.

Ensuring that both host and neighbouring communities are appropriately engaged and considered will strengthen—not dilute—the credibility of the assessment and the long-term success of the project.

CANHC stands ready to work collaboratively to strengthen the integration of community readiness into the assessment framework and support credible, durable nuclear development in Canada.