

Canadian Association of Nuclear Host Communities (CANHC)

Recommendations and Observations on the Summary of the Initial Project Description --New Nuclear at Wesleyville in Port Hope

1. Introduction and Purpose

The Canadian Association of Nuclear Host Communities (CANHC) appreciates the opportunity to provide early recommendations and observations to the Impact Assessment Agency of Canada (IAAC) on the *Summary of the Initial Project Description* (IPD) for the proposed New Nuclear at Wesleyville Project in Port Hope, Ontario.

CANHC represents municipalities across Canada that host, or are considering hosting, nuclear facilities. Our perspective is informed by decades of municipal experience with nuclear power generation, research facilities, fuel-cycle activities, and waste management. This experience provides a practical understanding of the long-term governance, socio-economic, and capacity-related implications of nuclear development at the municipal level.

The purpose of this submission is to provide **recommendations and observations for IAAC's consideration at the Initial Project Description stage**, with the intent of supporting early issue identification and appropriate scoping should an Impact Assessment (IA) proceed. These recommendations focus on matters that, based on host-community experience, warrant early attention to ensure a complete and balanced assessment framework.

2. Understanding of the IAAC Review at the IPD Stage

CANHC understands that the review of the Initial Project Description and its summary is an early-stage step under the *Impact Assessment Act*. At this stage, IAAC is not assessing project acceptability or determining impacts, but rather:

- confirming whether the project is a designated project;

- identifying areas of federal interest;
- identifying potential information gaps;
- informing the scope and focus of any future Impact Assessment; and
- supporting the development of Tailored Impact Statement Guidelines, should they be required.

CANHC's recommendations and observations are therefore intentionally framed as **issue-flagging and scoping considerations**, rather than conclusions or judgments about the project proposal itself.

3. Scope and Limits of CANHC's Submission

It is important to clarify the scope of CANHC's role in this submission, particularly for the benefit of CANHC member municipalities and regions reviewing this CANHC submission to IAAC.

CANHC is:

- Providing recommendations and observations based on the collective experience of nuclear host communities across Canada;
- Identifying municipal, socio-economic, governance, and capacity-related considerations that IAAC should ensure are examined should an IA proceed; and
- Offering observations and/ or recommendations intended to complement, not replace, local or project-specific submissions.

CANHC is not:

- Assessing the technical feasibility, safety, or design of the proposed project;
- Commenting on reactor technologies, siting alternatives, or project economics;
- Substituting for or duplicating submissions from the Municipality of Port Hope or neighbouring municipalities; or
- Advocating for or against the proposed project proceeding.

This approach reflects CANHC's role as a national association focused on **host-community issues and impacts**, rather than on project-specific technical evaluation.

4. Host Communities Are Not the General Public

A central observation from CANHC's experience is that **nuclear host communities cannot be treated as part of the general public for engagement or assessment purposes.**

Host communities:

- assume long-term responsibilities related to emergency preparedness, land-use planning, infrastructure coordination, and public communications;
- experience impacts across all project phases, from early planning through construction, operations, decommissioning, and long-term stewardship; and
- are required to integrate nuclear facilities into municipal governance and service delivery over multi-decade and often intergenerational timelines.

While the Summary of the IPD outlines engagement with Indigenous nations and with the public more broadly, CANHC observes that **the role of the host municipality as a distinct and uniquely impacted partner is not yet clearly articulated.** This distinction is particularly important at the IPD stage, as early framing decisions can shape the scope, resourcing expectations, and engagement pathways throughout the IA.

This is not a matter of observation alone, but a fundamental governance issue. Treating host communities, and neighbouring impacted municipalities or regions primarily as members of the general public risks underestimating:

- the scale and duration of municipal responsibilities;
- the ongoing operational interface between municipalities, the Canadian Nuclear Safety Commission (CNSC), other regulators, and the proponent; and,
- the increased capacity demands placed on small municipal administrations.

Recommendation for IAAC consideration

IAAC should ensure that any future Impact Assessment:

- explicitly distinguishes the host community from general public stakeholders;
- recognizes host municipalities as long-term governance and implementation partners; and
- ensures that the host community has structured, ongoing access and input commensurate with their role and responsibilities.

5. Relationship-Building Among Host Communities and Indigenous Nations

CANHC recognizes and supports the extensive engagement undertaken with Indigenous nations, as reflected in both the full IPD and its summary. Indigenous rights, interests, and perspectives are appropriately treated as foundational elements of the assessment process.

At the same time, CANHC observes an opportunity to strengthen the assessment framework by **explicitly supporting relationship-building and partnership among Indigenous nations and the host community and neighbouring impacted communities, over the course of the process.**

From host-community experience, meaningful and sustained relationships between Indigenous nations and host municipalities can:

- improve mutual understanding of local and regional impacts;
- support coordinated approaches to emergency preparedness, land use, and environmental stewardship; and
- contribute to more durable and trusted project governance over the long term.

Recommendation for IAAC consideration

IAAC may wish to consider how future assessment processes can:

- support respectful, parallel, and complementary engagement with Indigenous nations and the municipal host community(ies); and,
- encourage opportunities for collaboration and information-sharing where appropriate, while respecting distinct rights, roles, and decision-making authorities.

6. Socio-Economic Impacts: Depth, Focus, and Geography

CANHC's experience consistently demonstrates that socio-economic impacts are among the most significant and enduring effects experienced by nuclear host communities.

These impacts are often:

- cumulative and multi-phased;
- experienced unevenly over time; and
- not fully captured nor well-understood through high-level regional analyses.

Host communities are frequently small municipalities that rely on neighbouring communities for:

- workforce housing;
- health and social services; and,
- transportation and infrastructure capacity.

As a result, socio-economic impacts commonly extend beyond the immediate host municipality, even though the governance and administrative burdens often remain concentrated at the host-community level. CANHC has also found that, for nuclear projects, baseline socio-economic study data is frequently not available to validate predicted benefits and impacts over time. In practice, this can result in impacts that were not appropriately identified or assessed at the outset, but which are nonetheless borne by host and neighbouring communities.

From this perspective, CANHC observes that the OPG IPD and Summary do not clearly indicate a commitment to host-focused socio-economic studies, which may warrant further consideration by IAAC at this stage.

Recommendations for IAAC

CANHC recommends that IAAC ensure that any future Impact Assessment includes:

- fulsome socio-economic impact studies focused specifically on the host community;
- consideration of neighbouring communities where impacts are reasonably foreseeable; and,
- analysis of municipal service capacity, housing availability, workforce dynamics, and infrastructure pressures across all project phases.

Such socio-economic studies should include sufficient baseline information and data on projected outcomes, that can be verified and followed up on in the future to ensure adaptive management and mitigation where necessary. Furthermore, in light of the proximity of the proposed Wesleyville site to neighbouring nuclear communities, it is quite possible that there would be potential expansion of planning zones into these jurisdictions with respect to current nuclear land use.

7. Municipal Capacity, Governance, and Intergenerational Implications

CANHC members consistently report that nuclear projects generate sustained municipal responsibilities that extend well beyond traditional construction or operations timelines.

These responsibilities may include:

- emergency planning and coordination;
- complex nuclear regulatory and oversight participation;
- public communications and issue management;
- land-use planning and infrastructure alignment
- ongoing coordination with neighbouring municipalities and regions; and
- institutional knowledge retention over decades.

The Summary of the IPD contemplates multi-unit construction, overlapping operational lifetimes, and long-term decommissioning and safe storage. From a municipal perspective, this raises important governance questions related to continuity, capacity, and intergenerational responsibility.

Recommendation for IAAC consideration

IAAC should consider whether future assessment work:

- explicitly examines long-term municipal capacity and governance implications;
- recognizes intergenerational municipal responsibilities; and,
- accounts for cumulative administrative and operational burdens on the host community and the neighbouring communities.

Consideration of service agreements or arrangements may be needed between the host community and neighbouring impacted municipalities to deliver on responsibilities.

8. Emergency Management and Off-Site Readiness

Emergency preparedness is one of the earliest and most persistent interfaces between nuclear projects and host communities.

Based on CANHC experience:

- off-site emergency planning begins well before construction;

- municipal involvement is complex, sustained and resource-intensive; and
- effective preparedness depends on long-term coordination among municipalities, provinces, Canadian Nuclear Safety Commission (CNSC), federal authorities, other regulators, and licensees.

Recommendation for IAAC consideration

IAAC and the CNSC should ensure that:

- off-site emergency management roles and expectations are clearly scoped;
- municipal capacity and resourcing requirements are examined early; and
- emergency preparedness is not treated solely as a downstream CNSC licensing consideration.

Given the proximity of the Wesleyville site proposal to other nuclear host municipalities (Durham Region, Clarington, and Pickering), consideration for potential coordination or expansion of emergency planning should be considered as early as possible.

9. Cumulative Impact Issues and Existing Nuclear-Related Activities

The Wesleyville site exists within a broader regional context that includes historical and ongoing nuclear-related activities and federal initiatives.

From host-community experience, cumulative impacts influence:

- public confidence and trust;
- municipal workload and communications demands; and,
- governance complexity over time.

Recommendation for IAAC consideration

IAAC should consider how cumulative **municipal and governance impacts**, in addition to cumulative environmental effects, are identified and assessed, and that mitigative measures are considered by the proponent, the CNSC and others to address the effects.

10. Closing Perspective

CANHC's recommendations are intended to complement, not replace, the views of the Municipality of Port Hope as the proposed host community, which is best positioned to articulate local priorities, considerations, and perspectives.

CANHC offers these recommendations and observations in the spirit of constructive early engagement. Our experience suggests that issues related to host-community governance, socio-economic impacts, municipal capacity, and long-term responsibility are most effectively addressed when they are identified and scoped early in the assessment process.

CANHC looks forward to continued participation, as appropriate, as the IAAC process advances, and remains available to support informed consideration of host-community perspectives within Canada's nuclear assessment and decision-making frameworks.