



Coalition for Responsible Energy Development in New Brunswick
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Comment to the IAAC on the draft Integrated Tailored Impact Statement Guidelines: Include the Point Lepreau nuclear site and Indigenous nations and communities in New Brunswick

By email: nuclearwaste-dechetsnucleaires@iaac-aeic.gc.ca

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To the members of the Impact Assessment Agency of Canada:

Introduction to CRED-NB

The Coalition for Responsible Energy Development in New Brunswick (CRED-NB), a volunteer community-based organization formed in May 2020, provides education to the public and advocates for responsible energy development to address the climate crisis. CRED-NB represents more than 20 citizen groups and businesses and more than 150 individuals across New Brunswick, listed on our website: <https://crednb.ca/about/>

CRED-NB's comment the draft Integrated Tailored Impact Statement Guidelines

CRED-NB submitted a comment in February 2026 calling upon IAAC to conduct a full Impact Assessment and public hearing of the proposed Deep Geological Repository (DGR). We welcome the Agency's decision to proceed with a federal impact assessment for the DGR.

Here are our recommendations. The Integrated Tailored Impact Statement Guidelines MUST:

- 1) Assess the full lifecycle of the nuclear fuel waste inherent to this project, including a full assessment of the impacts of activities at each nuclear site where the high-level radioactive waste is presently located, including the Point Lepreau site in New Brunswick.
- 2) Ensure that Indigenous nations who stand to be impacted by the transportation and burial of this waste, its downstream effects and its continued interim storage are meaningfully involved in the design and conduct of the assessment. This includes the Peskotomuhkati Nation whose territory includes the Point Lepreau site.

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- 3) Require a comprehensive justification and ALARA analysis that applies across the full lifecycle of the project, including from Point Lepreau and along the transportation routes in New Brunswick, demonstrating that all radiological exposures to the public and the environment are justified and kept as low as reasonably achievable. Examine exposures to radioactivity, the design and safety testing of the transportation containers, emergency response, support for First Responders, route selection, and notifications to local authorities.
- 4) Include a detailed assessment of radiological risks associated with all source-site activities, including handling, repackaging, and loading of used nuclear fuel at the Point Lepreau site.
- 5) Ensure cumulative effects are assessed considering existing and historical impacts at the Point Lepreau nuclear site, given the increased risk of radiological releases and contamination stemming from its handling and movement.
- 6) Study impacts on the fish, fish habitat and aquatic species in freshwater and marine ecosystems at and near Point Lepreau. The Bay of Fundy is a living marine system that sustains cultural practices and relationships that extend across generations and species.

CRED-NB appreciates this opportunity to offer our recommendations.

Respectfully submitted,

Ann McAllister, Chair
Coalition for Responsible Energy Development in New Brunswick (CRED-NB)