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The Regional Municipality of Durham Report

To: Committee of the Whole
From: Commissioner of Community Growth and Economic Development
Report: #2026-COW-13
Date: March 11, 2026

Subject:

Durham Region Submission to the Impact Assessment Agency of Canada for the Wesleyville New Nuclear Project Initial Project Description

Recommendation:

That Committee of the Whole recommends to Regional Council:

That Regional Council endorse Durham Region's submission to the Impact Assessment Agency of Canada for the Wesleyville New Nuclear Project Initial Project Description submitted February 11, 2026 (Attachment 1).

Report:

1. Purpose

1.1 This report provides Regional Council with an overview of the proposed Wesleyville New Nuclear Project, including analysis of the initial Project Description submitted under the federal Impact Assessment process, and assesses the potential implications for Durham Region and the Municipality of Clarington.

2. Background

2.1 Ontario Power Generation (OPG) is advancing early planning for a major new nuclear generation project at its Wesleyville site in Port Hope, immediately east of Durham Region. The project began its federal regulatory approvals process when OPG submitted its Initial Project Description to the Impact Assessment Agency of

Canada, marking the start of a multi-phase integrated impact assessment conducted jointly with the Canadian Nuclear Safety Commission (CNSC).

- 2.2 The proposed Wesleyville New Nuclear Project is considered a designated project because of the project type and its size. That means the federal government automatically requires it to go through a full Impact Assessment. Under federal rules, any proposal to build a new nuclear reactor over 200 megawatts (MW) on a site that isn't already licensed is automatically designated. Once a project meets that threshold, it must follow the complete Impact Assessment process to examine its potential environmental, social, health, economic impacts as well as impacts to Indigenous communities and treaty rights, while identifying how adverse impacts can be mitigated.

Figure 1: Impact Assessment Act process. Source: [Impact Assessment Agency of Canada](#).



- 2.3 The Wesleyville site is already zoned for electricity generation and is located near existing transmission corridors, transportation routes, and Lake Ontario. OPG's early technical assessments indicate that the site could host up to 10,000 MW of new nuclear generation capacity, larger than the Pickering Nuclear Generating Station (2,200 MW once refurbished), Darlington Nuclear Generating Station (4,800 MW), and the four small modular reactors (SMRs) at Darlington (1,200 MW) combined. 10,000 MW is enough electricity to power roughly 10 million homes.

- 2.4 OPG has not selected a reactor technology but is considering a range of large-scale technologies as part of a “plant parameter envelope” approach similar to the process undertaken in the late 2000’s for the Darlington New Nuclear Project. This long-term planning aligns with Ontario’s need for significant new generation as electricity demand grows by an estimated [75 per cent by 2050](#).
- 2.5 The Municipality of Port Hope and Williams Treaties First Nations have expressed interest in exploring the project. The province has also provided capacity funding to support participation by Indigenous communities and the Municipality of Port Hope. Recent announcements^{1, 2} include up to \$50 million in funding for new host communities, as well as dedicated early-stage funding for Port Hope:
- a. \$1 million for planning, infrastructure assessments, and consultation;
 - b. Up to \$30 million in milestone-based funding to support infrastructure investment and co-located industry attraction;
 - c. A further \$4 million of growth readiness funding to support the community in preparing for the workload of the Impact Assessment process and beginning stages of a proposed Wesleyville nuclear facility; and
 - d. An additional \$500,000 to support specific staffing requirements related to project work.
- 2.6 Existing nuclear host communities, including Durham Region, are not eligible for these new funding programs, despite facing significant new pressures from SMRs, refurbishments, and the ongoing build-out of the provincial nuclear fleet. Ensuring fairness and equitable access to hosting-related funding continues to be a challenge.
- 2.7 If fully built, the Wesleyville New Nuclear Project is expected to deliver substantial economic benefits. According to [recent modelling cited in industry reporting](#), a large-scale nuclear development at the site could contribute approximately \$235 billion to Ontario’s GDP over its multi-decade lifecycle and support more than 10,500 jobs across the province, including an estimated 1,700 jobs in Port Hope. The facility would also strengthen Ontario’s clean-energy supply and improve grid reliability.

¹ January 15, 2025. [News Release: Ontario Exploring New Nuclear Energy Generation in Port Hope.](#)

² February 12, 2026. [News Release: Ontario Secures Agreement to Advance World’s Largest Nuclear Generating Station.](#)

- 2.8 The current projected timeline anticipates site preparation beginning in 2030, major construction starting in 2033, and first power production in 2040, though these milestones depend on the outcome of the federal Impact Assessment and licensing by the CNSC. The process will continue to evolve as OPG refines project details and responds to issues raised through the assessment.
- 2.9 For Durham Region, the project's proximity means certain implications for emergency management, transportation networks, workforce demand, housing, and regional infrastructure—areas that will require sustained involvement as planning advances.

Figure 2: Wesleyville Site Overview. Source: [OPG](#).



3. Previous Reports and Decisions

- 3.1 Report #[2026-COW-7](#) – Durham Region Nuclear Sector Strategy 2026 Update.
- 3.2 Report #[2021-COW-37](#) – Durham Region Nuclear Sector Strategy 2022-2032.

- 3.3 Report #[2021-COW-9](#) – Response to the Canadian Radioactive Waste Policy Review.
- 3.4 Report #[2011-J-41](#), New Nuclear Darlington Project Update – Results of the Joint Review Panel.
- 3.5 Report #[2011-J-29](#), Darlington New Nuclear Project Update and Request for Funding for Provision of Consulting Services to Complete a Regional Economic Impact Assessment.
- 3.6 Report #[2010-J-29](#), Update on Durham Nuclear Issues and Response to the Joint Review Panel on the New Nuclear Darlington Project Environmental Impact Statement (EIS) and Application for Licence to Prepare Site.

4. The Wesleyville Initial Project Description

- 4.1 The Initial Project Description for the Wesleyville Project was [posted](#) to the Canadian Impact Assessment Registry on January 12, 2026, initiating a 30-day public comment period within the 180-day Planning Phase. Comments received at this stage supported the agency's [Summary of Issues](#), which will help shape the scope of the integrated assessment.
- 4.2 The Initial Project Description describes the project as the construction, operation, maintenance, and eventual decommissioning of a large-scale new nuclear generating station that would operate for approximately 78 years. Several reactor technologies are under consideration, but the document does not select a specific technology at this stage. Notably, OPG is considering designs with the inclusion of cooling towers and is considering waste solutions including interim storage of nuclear waste at existing offsite facilities. Durham Region and the Municipality of Clarington have longstanding positions opposing any nuclear design that includes the construction of cooling towers. Additionally, Durham Region has longstanding positions opposing long-term storage of used-nuclear fuel at the nuclear stations in Durham Region and that nuclear host communities be compensated for hosting waste on an interim or long-term basis.
- 4.3 The Initial Project Description was prepared in collaboration with the Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations, including input from Elders and community members with traditional knowledge of the area.

- 4.4 The Initial Project Description defines the physical boundaries of the project footprint and lists project components such as buildings, systems, and supporting infrastructure. The document also identifies potential pathways for effects on the environment and people, including interactions with wildlife, water resources, local land use, socio-economic conditions, and community services.
- 4.5 Overall, the Wesleyville Initial Project Description sets out the early plans for a proposed new nuclear generating station, describes the site and its surroundings, and identifies the potential interactions that will require further study in the Impact Assessment. Because the document provides the foundation for how the assessment will proceed, the information submitted and the feedback received at this early stage will shape the geographic area of study, the issues that are examined in depth, and importantly, which jurisdictions and communities are formally recognized as having relevant roles and interests in the assessment.

Comparative Analysis of the Wesleyville Initial Project Description and Bruce C Initial Project Description

- 4.6 The Impact Assessment for the new nuclear project at the Bruce Nuclear Generating Station (“Bruce C Project”) is running in parallel, but it started last summer. Although both involve large-scale nuclear development, the proponents have framed the projects differently in their Initial Project Descriptions, and that difference has important implications for Durham Region.
- 4.7 An Impact Assessment is not only an environmental study. It establishes who regulators consider affected, defines the geographic study areas, identifies which governments have a formal role, and determines which topics must be examined, including housing, health services, infrastructure, socio-economic effects, and emergency planning. The Initial Project Description begins this framing. If a jurisdiction is not recognized early, it becomes more difficult to broaden the scope later in the process.
- 4.8 Bruce Power presents Bruce C as an expansion within an existing nuclear site, yet it describes project interactions in a regional context. It links the project to broader environmental systems, regional transportation networks, workforce and housing markets, and shared water resources. Further, Bruce Power has provided funding to Bruce County, the Municipality of Kincardine, and neighbouring municipality of Saugeen Shores to support multi-year staff participation in the Impact Assessment process and to support the municipal development of workforce development and

growth management studies. This approach signals that project effects extend beyond the host municipality and occur through interconnected regional systems.

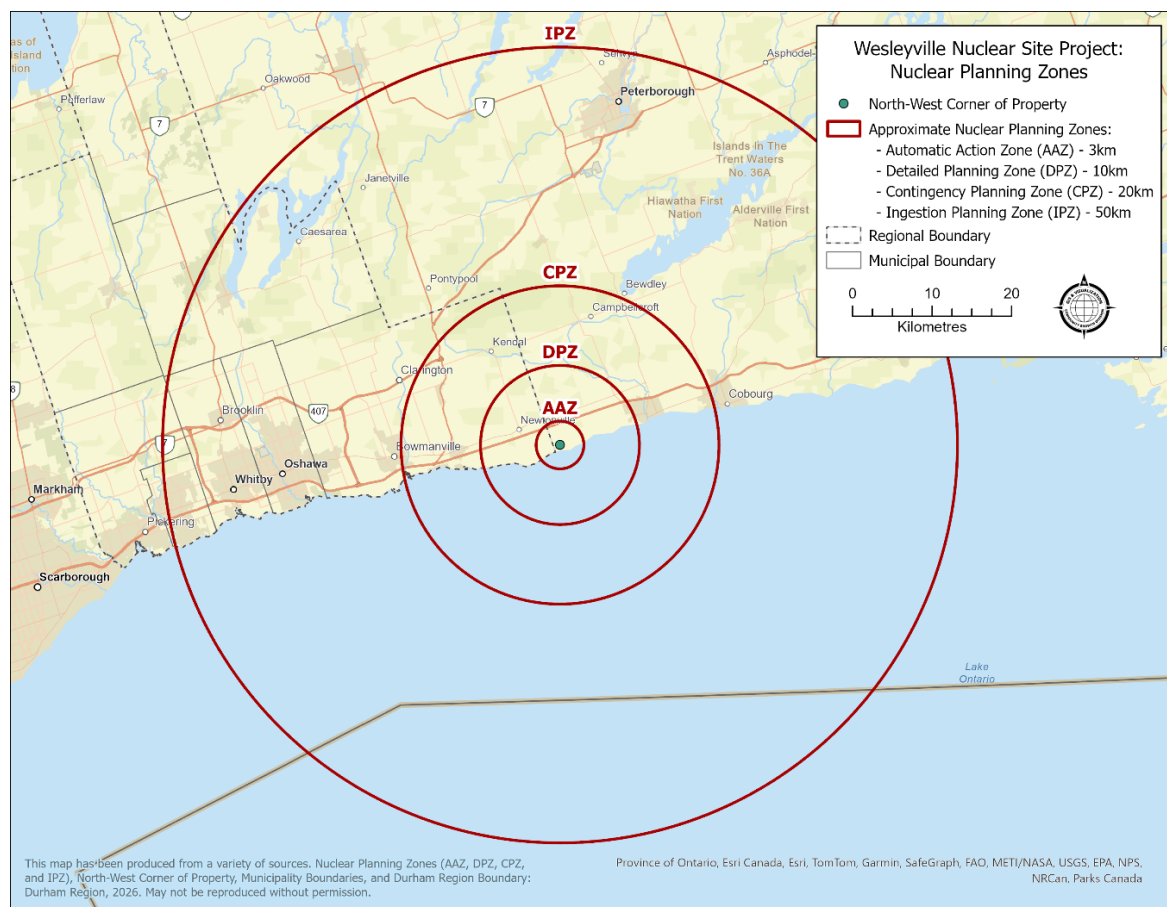
- 4.9 OPG presents Wesleyville differently. Although Wesleyville would establish a new nuclear generation site in a more densely interconnected part of the province, the Initial Project Description focuses primarily on the site and the Municipality of Port Hope and Northumberland County. It does not clearly extend the framing of potential effects into adjacent Durham Region, despite being less than 1 kilometre away from the project site.
- 4.10 This difference creates a structural risk. If the assessment scope for Wesleyville follows the narrower framing, the study areas may remain smaller, socio-economic analysis may focus largely on the host municipality, and cumulative effects along the Lake Ontario nuclear corridor may receive less regional consideration. Durham could be treated as peripheral rather than as an adjacent jurisdiction with direct functional connections to the project.
- 4.11 Durham Region shares Lake Ontario as a receiving environment, participates in the same labour and housing markets, and operates within the same broader emergency planning context. These linkages reflect how effects occur in practice, through environmental systems, infrastructure networks, and population movements rather than municipal boundaries.

Summary of Comprehensive Review by Regional Staff

- 4.12 Led by the Community Growth and Economic Development Department, staff carried out an in-depth review of the more than 350-page Initial Project Description for the project. Staff examined the document in detail, identifying potential implications for emergency management, transportation, environmental monitoring, financial impacts, land use, housing, health, and other services. Our draft analysis was shared with the Municipality of Clarington and the City of Pickering to ensure alignment.
- 4.13 The review of the Wesleyville Initial Project Description identifies several impact pathways that extend into Durham Region and the Municipality of Clarington. Emergency management represents one of the most direct and certain impact areas. Durham Region and Clarington will hold legislated responsibilities under the [Provincial Nuclear Emergency Response Plan](#), including ongoing emergency planning requirements, evacuation support, emergency workers centres, reception centre operations, paramedic services, public health functions such as potassium iodide distribution, fire services, and emergency social services. These obligations

arise from the presence of a nuclear generating station and are not speculative. A significant portion of the emergency planning zones will extend into Durham Region. These responsibilities create operational, infrastructure, staffing and fiscal demands that should be assessed during the Impact Assessment rather than deferred to later licensing stages.

Figure 3: Approximated Nuclear Planning Zones for the Wesleyville Nuclear Generating Station including the Automatic Action Zone (AAZ), Detailed Planning Zone (DPZ), Contingency Planning Zone (CPZ), and Ingestion Planning Zone (IPZ). Source: Durham Region.

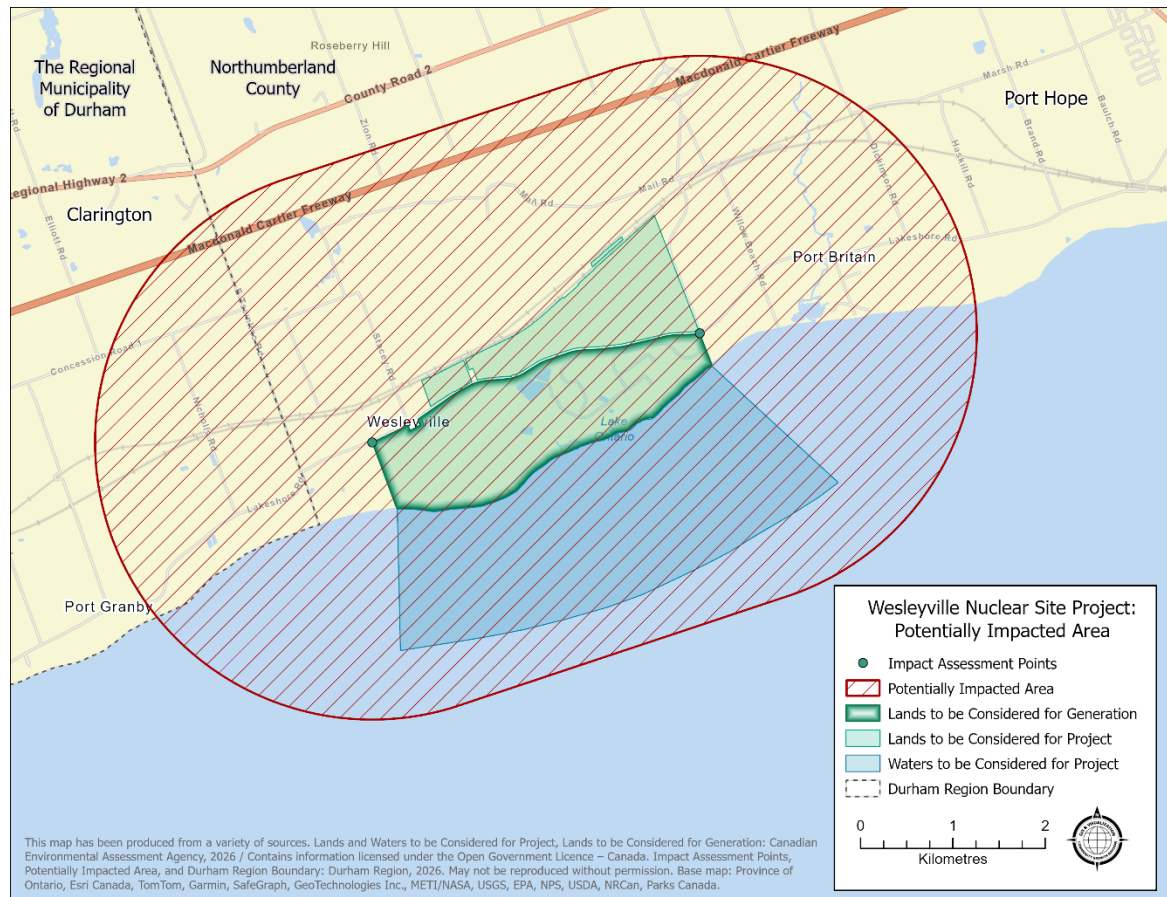


4.14 It is anticipated that this project will also create fiscal pressures for Durham Region and Clarington. Durham Region and Clarington will incur costs associated with emergency management, infrastructure, communications, and service delivery in support of the station construction and operations without receiving property tax revenue/payments in lieu of taxes or development fees from the facility. Staff participation in the Impact Assessment process, future licensing processes, and recurring emergency exercises required by the CNSC will generate ongoing

expenditures. This situation creates a financial pressure where statutory responsibilities and resulting costs do not align with revenue sources.

- 4.15 Construction activities will generate cross-boundary environmental effects. Dust, noise, vibration, light, and air quality impacts will not stop at the Northumberland boundary and may affect nearby rural communities and agricultural lands in Durham. Transportation impacts will also extend beyond the host municipality. Construction workers, equipment transport, and potential emergency routing will rely on regional and local road networks, which may experience increased traffic volumes, safety pressures, and infrastructure wear.
- 4.16 The project may also influence housing needs in Durham/Clarington and human services systems. Large construction workforces can increase demand for housing, affect affordability, and place pressure on social and health services in surrounding municipalities, including Durham. These socio-economic effects follow labour markets and commuting patterns rather than administrative borders, which supports a regional assessment lens.
- 4.17 Durham hosts multiple nuclear facilities and carries associated responsibilities for emergency management, environmental monitoring, transportation, public health, communications, and infrastructure. The Wesleyville project would add another major nuclear installation in close proximity. This situation creates cumulative regional effects that compound existing service demands and infrastructure pressures, particularly given the potential scale. The assessment should therefore examine cumulative impacts in the context of the broader Lake Ontario nuclear corridor.
- 4.18 Land use represents another impact pathway. Restrictions on future development of sensitive land uses (e.g., residential development) within the Automatic Action Zone will have implications for the Region, affected area municipalities, and immediate landowners. While a significant portion of the lands within this area in Durham Region are owned by Atomic Energy of Canada Limited (AECL) for the Port Granby Project, there are also privately owned lands that would be subject to new constraints on permitted uses, as required by the CNSC. These restrictions would require amendments to Clarington's Official Plan and would limit the types of development or land uses available to affected private landowners.

Figure 4: An estimate of the area that would be impacted by land use restrictions as required by the CNSC. The actual area would be determined based on the location of the nuclear generating station within the lands being considered for generation. Source: Durham Region.



4.19 Nuclear waste management presents a further regional interaction. The Initial Project Description identifies options that could involve transporting, processing, or temporarily storing low- and intermediate-level waste at existing licensed facilities, potentially in Durham Region. These scenarios engage Durham’s role as a long-standing nuclear host community and raise issues related to cumulative impacts, infrastructure use, and community acceptance.

4.20 Physical environment considerations also extend beyond the immediate site. Alterations to the Lake Ontario shoreline through infilling or shoreline hardening may change littoral sediment transport and erosion patterns along the north shore of Lake Ontario. These changes could have implications for shoreline stability and interact with other federally regulated legacy waste sites. Large-scale excavation, grading, and dewatering may also influence groundwater movement and potential

contaminant pathways across property boundaries in an area with a history of nuclear and industrial activity.

- 4.21 The assessment should also consider health in a broad sense. The Impact Assessment Act defines health as physical, mental, and social well-being. Pressures on municipal infrastructure, emergency services, housing, and social systems influence these determinants of health. Financial and operational burdens that reduce municipal capacity to deliver core services therefore represent an indirect but important pathway through which the project can affect community well-being.
- 4.22 Taken together, these impact pathways demonstrate that the Wesleyville project interacts with Durham Region and the Municipality of Clarington through emergency management, fiscal capacity, transportation, housing, land use, environmental systems, cumulative nuclear development, and public health determinants. These interactions support the need for a regional study area and formal recognition of Durham Region and the Municipality of Clarington as affected jurisdictions within the Impact Assessment process.

5. Alignment with Durham Region's Nuclear Sector Strategy

- 5.1 The Wesleyville New Nuclear Project aligns with Durham Region's Nuclear Sector Strategy by supporting the Region's goal to grow and sustain a vibrant nuclear economy that creates jobs, attracts investment, and strengthens supply chains. Although the project site lies just outside Durham's boundary, it will generate real economic activity for residents and businesses in Durham and Clarington through labour demand, supplier contracts, and participation in planning, construction and operations. This outcome supports Durham's objective to expand regional economic benefits from nuclear development and to broaden opportunities for local firms and workers. The project also reinforces the Region's focus on clean energy leadership by contributing to the broader nuclear capacity needed to achieve provincial and local climate goals, while drawing business and research interest into the Lake Ontario corridor.
- 5.2 Durham Region has long played a leadership role in supporting Ontario's nuclear sector and continues to support the expansion of nuclear generation as a critical component of provincial decarbonization, energy reliability, and economic development. As the Province advances new frameworks for future nuclear development, there remains an opportunity to ensure that they also recognize the sustained responsibilities and fiscal impacts borne by existing host communities.

6. Relationship to Strategic Plan

6.1 This report aligns with/addresses the following Strategic Direction(s) and Pathway(s) in Durham Region's 2025-2035 Strategic Plan:

a. Connected and Vibrant Communities

- C1. Align Regional infrastructure and asset management with projected growth, climate impacts, and community needs.
- C2. Enable a full range of housing options, including housing that is affordable and close to transit.

b. Environmental Sustainability and Climate Action

- E2. Collaborate with partners on the low-carbon transition to reduce community greenhouse gas emissions across Durham Region.
- E5. Respect the natural environment, including greenspaces, waterways, and agricultural lands.

c. Healthy People, Caring Communities

- H1. Implement preventive strategies to support community health, including food security.

d. Resilient Local Economies

- R1. Attract and retain quality employers that strengthen key economic sectors, including energy and technology.
- R3. Develop, attract, and support a skilled and qualified workforce, including youth and newcomers.

e. Strong Relationships

- S1. Enhance inclusive opportunities for community engagement and meaningful collaboration.
- S2. Build and strengthen respectful relationships with First Nations, Inuit, Métis, and urban Indigenous communities.
- S3. Collaborate across local area municipalities, with agencies, non-profits, and community partners to deliver co-ordinated and efficient services.

- S4. Advocate to the federal and provincial government and agencies to advance regional priorities.
- S5. Ensure accountable and transparent decision-making to serve community needs, while responsibly managing available resources.

7. Conclusion

- 7.1 Durham Region has consistently recognized the nuclear sector as an essential driver of provincial decarbonization, regional economic growth, workforce development, and long-term energy reliability. The Region's experience hosting major nuclear facilities positions Durham as a committed and constructive partner in advancing new nuclear development.
- 7.2 Early recognition of Durham Region and Clarington as affected jurisdictions in the Wesleyville New Nuclear Project Impact Assessment will help ensure that regional infrastructure needs, community safety systems and cumulative effects are fully considered. This recognition will allow the Region to participate meaningfully in decisions that affect regional outcomes and support coordinated planning with OPG and other governments.
- 7.3 In the absence of dedicated funding for existing nuclear host communities, early and ongoing engagement with OPG will allow Durham Region and Clarington to better understand expected local impacts and position our communities to access other government funding programs, such as the Rural Ontario Development Program. This program provides cost-shared support for projects that build economic capacity in rural areas, attract and retain businesses and investment, strengthen regional resilience and partnerships, address workforce development needs, and transform community assets to drive long-term economic growth.
- 7.4 Given the short commenting window and February 11, 2026, deadline to submit comments, Attachment 1 was submitted as Durham Region's submission to the Impact Assessment Agency at the direction of the Regional Chair. Should Council request revisions, staff will work with the Impact Assessment Agency to notify them of any changes.
- 7.5 Staff from all Regional departments contributed to this report through the Nuclear Sector Working Group in collaboration with staff from the Municipality of Clarington and the City of Pickering.

7.6 On February 24, 2026, Durham Region received correspondence from the Impact Assessment Agency's Integrated Assessment Team for the Proposed New Nuclear at Wesleyville Project indicating that Regional staff will be invited to a meeting in late March to discuss the Region's role in the integrated assessment.

8. Attachments

- Attachment #1: Durham Region submission to the Impact Assessment Agency of Canada for the Wesleyville New Nuclear Project Initial Project Description
- Attachment #2: Municipality of Clarington submission to the Impact Assessment Agency of Canada for the Wesleyville New Nuclear Project Initial Project Description
- Attachment #3: 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

Prepared by: Caitlin Rochon, Manager, Corporate Initiatives.

Respectfully submitted,

Original signed by

Sandra Austin
Commissioner of Community Growth and
Economic Development

Recommended for Presentation to Committee

Original signed by

Elaine C. Baxter-Trahair
Chief Administrative Officer



Sent by Email

February 11, 2026

**The Regional
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Re: Initial Project Description for the New Nuclear at Wesleyville Project

Dear Impact Assessment Agency of Canada,

The Regional Municipality of Durham ('Durham Region') appreciates the opportunity to comment on the Initial Project Description for Ontario Power Generation's (OPG) proposed New Nuclear at Wesleyville Project. We support Ontario's efforts to expand clean, reliable electricity generation capacity and we recognize the important role that new nuclear development will play in meeting the province's long-term energy needs. Our staff have participated in early interviews to support OPG's socio-economic assessment of the Wesleyville Project and have invited OPG to brief Regional Council as part of our ongoing commitment to participation in the nuclear sector.

Our review of the 350-page Initial Project Description identified several opportunities to address gaps to the assessments "preliminary real and potential impacts." Although the Initial Project Description is an early-stage planning document, its framing establishes the study areas, the jurisdictions considered affected, and ultimately the scope of the Impact Assessment. Clear and accurate geographic and jurisdictional assumptions at this stage are essential.

The Region is concerned to see that neither Durham Region nor Clarington is identified in Section 4.3.4 as a jurisdiction with powers, duties, or functions related to the assessment of potential effects. Both levels of municipal government share environmental, labour market, housing, transportation, public health and emergency response responsibilities (including police, paramedic services and fire services) with the Wesleyville area, and both will hold legislated obligations

directly related to the Wesleyville Nuclear Generating Station under Ontario's nuclear policy and Provincial Nuclear Emergency Response Plan (PNERP). With the proposed generating station located approximately one kilometre from our communities, any transboundary effects will directly affect our jurisdictions.

Accordingly, we request formal recognition of Durham Region and Clarington as affected jurisdictions within the Impact Assessment process.

We also note key differences between the framing of the Wesleyville Initial Project Description and the approach used for the Bruce C Project. Bruce Power situates its project within a broader regional context, acknowledging shared water bodies, transportation networks, labour and housing markets, and cumulative environmental systems. In recognition of the regional impacts of a project of this scale, Bruce Power has also provided multi year funding to Bruce County, The Municipality of Kincardine, and the neighbouring Town of Saugeen Shores to support their meaningful participation in the IA process, including funding for new staff positions at each municipality and studies related to workforce impacts and growth management.

In contrast, OPG's Wesleyville Initial Project Description adopts a much narrower scope focused primarily on the Municipality of Port Hope and Northumberland County, without adequately extending the assessment lens or funding to adjacent Durham Region and Clarington despite the immediate proximity and high degree of regional interconnectedness.

A narrow framing risks underestimating socioeconomic effects, limiting study areas, and overlooking cumulative effects along the Lake Ontario nuclear corridor. These are not abstract risks—they reflect how environmental, labour, transportation, and emergency management systems function in practice. Early and ongoing engagement will allow our municipalities to understand expected local impacts, identify pressures on infrastructure and services, and position our communities to access upper-level government programs designed to support economic development and regional resilience.

The attached document outlines the key gaps in the Initial Project Description, including emergency management responsibilities, financial impacts, land use and planning implications, cross-boundary effects, geological considerations, shoreline alteration, nuclear waste management, and cumulative impacts. Each of these areas requires early, clear, and comprehensive assessment to ensure an accurate understanding of how the project will interact with municipal systems and responsibilities.

Durham Region remains supportive of nuclear generation as a key component of Ontario's clean, reliable energy system, and we have confidence in OPG's proven ability to safely construct and operate nuclear facilities. Our intent is to support a strong and complete Impact Assessment by offering constructive analysis and by ensuring that the assessment reflects the realities of regional infrastructure, service

delivery, and community well-being. Given our proximity to the project site, the statutory responsibilities that will arise directly from this development, and the clear cross-boundary environmental and social interactions involved, Durham Region and Clarington must be fully considered as affected jurisdictions throughout the Impact Assessment process.

Sincerely,
<Original signed by>

John Henry

Regional Chair and CEO

Attachment: Regional Municipality of Durham Assessment of the Initial Project Description for the proposed New Nuclear at Wesleyville Project

Regional Municipality of Durham Assessment of the Initial Project Description for the proposed New Nuclear at Wesleyville Project

Introduction and executive summary

The Regional Municipality of Durham ('Durham Region') has reviewed Ontario Power Generation's Initial Project Description for the proposed New Nuclear at Wesleyville Project. While the Initial Project Description is an early-stage planning document, its framing determines study boundaries, affected jurisdictions, and ultimately the scope of the federal Impact Assessment. Our review identifies several significant gaps in how the Initial Project Description interprets and presents the "preliminary real and potential impacts of the project."

Given Durham Region and Clarington's proximity (approximately one kilometre from the proposed generating station) and the statutory responsibilities both municipalities hold under provincial nuclear emergency planning and service-delivery frameworks, the Initial Project Description must recognize our jurisdictions as directly affected. The narrow geographic framing currently applied overlooks the integrated environmental, transportation, labour, housing, emergency management, and infrastructure systems that connect our communities with the Wesleyville area.

Key gaps include:

- **Emergency Management:** Large portions of the legislated emergency planning zones fall within Durham Region and Clarington, creating mandatory operational responsibilities that must be assessed within the federal process.
- **Financial Impacts:** Durham and Clarington will bear significant service and infrastructure costs but will not receive property tax or payment-in-lieu revenues from the facility, resulting in fiscal imbalance.
- **Land Use and Planning:** Required Canadian Nuclear Safety Commission (CNSC) restrictions will limit development potential on lands within the Automatic Action Zone, including privately owned parcels.
- **Cross-Boundary Effects:** Construction-related impacts, transportation pressures, workforce in-migration, and active transportation disruptions will extend into Clarington and Durham Region and require regional assessment.
- **Cumulative Impacts:** Durham already hosts extensive nuclear infrastructure, necessitating a broader cumulative effects lens.

- **Geology and Shoreline Alteration:** Legacy subsurface features and potential shoreline changes warrant further clarification due to interactions with nearby regulated sites.
- **Nuclear Waste Management:** Any scenario involving transport, processing, or storage of waste within Durham Region requires early, formal engagement.
- **Cooling Towers:** Durham Region Council has a long-standing position opposing design options with cooling towers as a matter of social and economic impact.

Across all topic areas, the overall concern is that the current Initial Project Description does not sufficiently reflect the interconnected regional context or the statutory obligations that will fall to Durham Region and Clarington as neighbouring municipalities with established nuclear-related responsibilities. A regionally scoped assessment, supported by appropriate baseline data, modelling, and consultation, is required to ensure accuracy, transparency, and alignment with both municipal and federal expectations.

The following sections provide a more detailed analysis of key issues identified in OPG's assessment of "preliminary real and potential impacts of the project." This summary is intended to support a more complete and accurate understanding of the project's potential effects and to reinforce the need for these considerations to be addressed early in the Impact Assessment process.

Emergency Management

Municipalities have defined statutory responsibilities under the Provincial Nuclear Emergency Response Plan (PNERP). These responsibilities include the provision of evacuation support, reception centres, public health programs such as potassium iodide distribution, emergency communications, police, paramedic services, fire services, and emergency social services. For Pickering Nuclear Generating Station and Darlington Nuclear Generating Station, Durham Region is also responsible for operating and maintaining the nuclear public alerting system, including nuclear sirens and auto dialler system due to specific nuclear planning zone responsibilities. A significant portion of the legislated emergency planning zones for the Wesleyville station, including the automatic action zone and detailed planning zones, are within Durham Region and Clarington and will have specific emergency management requirements. These are not optional or speculative obligations. Emergency planning assumptions, service demands, infrastructure requirements, and cost implications must be assessed during the Impact Assessment stage. They are not within the scope of the CNSC's mandate.

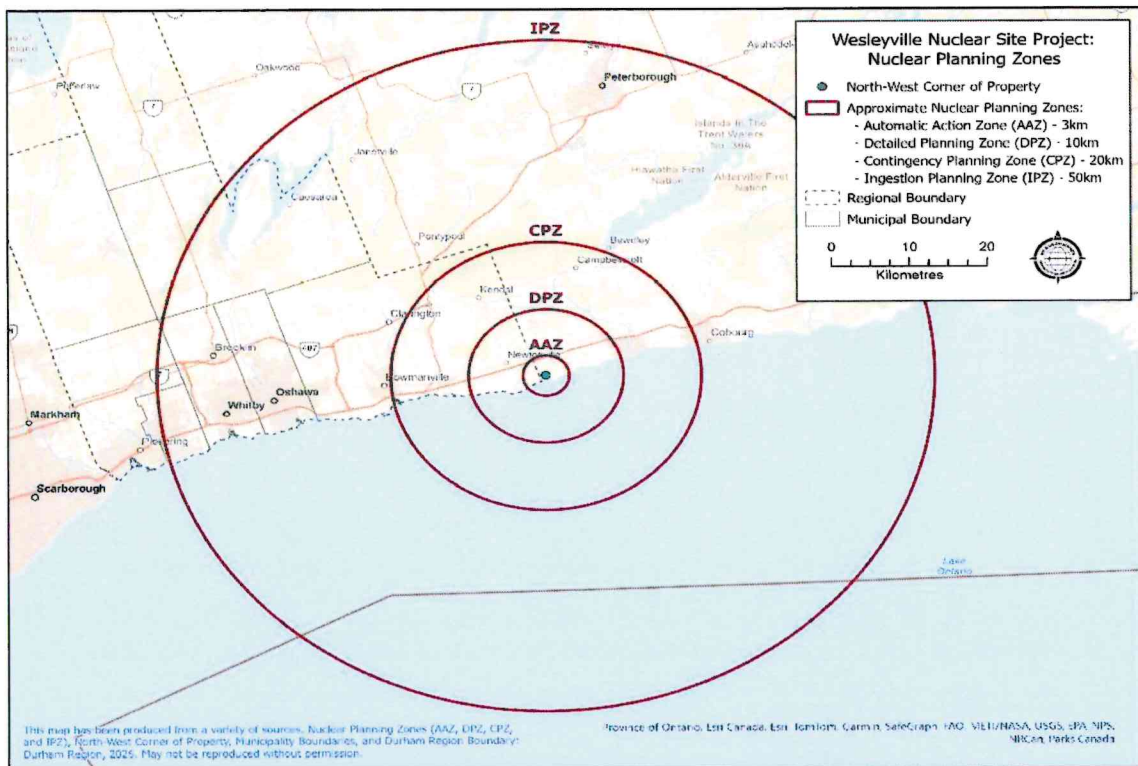


Figure 1: An estimate of the Automatic Action Zone (AAZ), Detailed Planning Zone (DPZ), Contingency Planning Zone (CPZ), and Ingestion Planning Zone (IPZ) for the Wesleyville Nuclear Generating Station.

Financial Impacts: Service impacts

Durham Region and Clarington will bear major infrastructure, communications, and service delivery costs associated with the construction and operation of the Wesleyville station but will not receive property tax or payments in lieu (PILs) revenue from the facility. The Municipality of Port Hope and Northumberland County will receive the fiscal benefit, while Durham Region and Clarington will absorb a disproportionate share of operational responsibility. The Impact Assessment must acknowledge this financial asymmetry and assess its implications for fiscal equity and economic impacts on Durham Region and Clarington. Impact mitigation mechanisms must address the gap between operational obligations directly attributable to this project and its revenue base. Project-related funding needs to be provided to all municipalities with statutory responsibilities.

Durham Region has consistently advocated that communities should not shoulder the operational burden of federally regulated projects without corresponding financial arrangements. The Impact Assessment must consider the need for formal impact mitigation and service arrangements with affected municipalities including Clarington and Durham Region, such as a Host Community Agreement or Regional Impacts and Services Agreement, as a potential mitigation measure.

If you require this information in an accessible format, please contact Communications and Engagement at CorporateCommunications@durham.ca or 311, extension 3743.

Financial Impacts: Historic fiscal arrangements with existing nuclear host communities

As Ontario enters a new nuclear build cycle, it is critical that historic fiscal arrangements that limited the municipal benefit of hosting nuclear generation not be replicated. Past electricity-sector financing structures directed payments associated with nuclear facilities, including payments in lieu of property taxes, toward servicing provincial liabilities arising largely from earlier nuclear construction cost overruns. While this approach addressed provincial financial pressures at the time, it resulted in host communities accommodating major provincial infrastructure while receiving less direct fiscal benefit than is typical for large industrial facilities.

Durham Region views the current period as a policy transition point. New nuclear development, including the proposed Wesleyville facility, must be financed through structures that do not reintroduce mechanisms whereby project costs, overruns, or associated liabilities are managed in ways that continue to direct debt repayment to host community property taxpayers. Payments associated with new nuclear facilities should flow to host municipalities in a manner comparable to industrial property taxation, reflecting the infrastructure, land use, emergency services, and growth management responsibilities borne locally.

The Province has recently recognized the importance of municipal hosting arrangements through dedicated funding commitments to new host communities in connection with new nuclear proposals. Durham Region supports this direction but emphasizes that all host municipalities must be equitably included in emerging fiscal and funding frameworks. This matter is raised as a question of municipal fiscal sustainability and intergovernmental fairness, not as a matter of support for nuclear generation, which remains an important component of Ontario's clean energy future.

Land Use Restrictions

Restrictions on future development of sensitive land uses (e.g., residential development) within the Automatic Action Zone will have implications for affected area municipalities and immediate landowners. While a portion of the lands within this area in Clarington is owned by Atomic Energy of Canada Limited (AECL), there are also privately owned lands that would be subject to new constraints on permitted uses, as required by the CNSC. These restrictions will require amendments to Clarington's Official Plan and will limit the types of development or land uses available to affected private landowners.

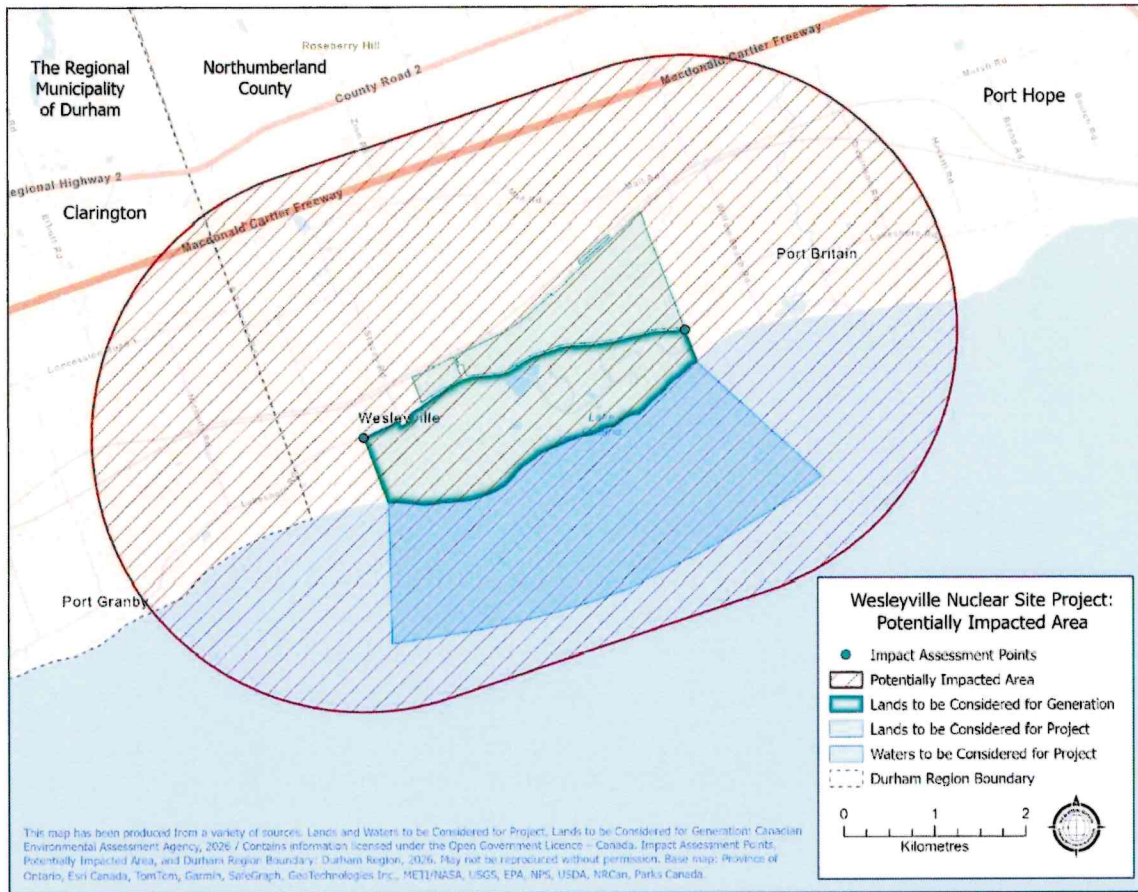


Figure 2: An estimate of the possible extent of area that would be impacted by land use restrictions as required by the CNSC. The actual area would be determined based on placement of the nuclear generating station within the lands being considered for generation.

Private Wells

The site is not within a source protection area; however, private wells exist nearby. OPG should confirm whether they have assessed the nearby private wells including those within Durham Region and determined that they are sufficiently distant from the site to avoid any potential impacts.

Cross-Boundary Impacts

Construction related dust, noise, vibration, and air quality impacts will not stop at municipal boundaries. Adjacent rural communities and agricultural lands may experience nuisance and health related effects. Transportation impacts, including workforce commuting, equipment movement, and emergency routing, will rely on Durham Region and Clarington’s transportation network. The Waterfront Trail, which

runs along Lakeshore Road, is another example of cross boundary active transportation network infrastructure that could be affected. The local and regional study areas must include adjacent lands within Durham Region and Clarington. Baseline data, modelling, and mitigation commitments should explicitly address cross-boundary effects, with monitoring programs designed to detect and respond to impacts experienced in Durham Region and Clarington. Assessments should evaluate transportation impacts on roads and corridors in Durham Region, including traffic volumes, safety, wear-and-tear, and emergency access. related dust, noise, vibration, and air quality impacts will not stop at municipal boundaries. Adjacent rural communities and agricultural lands may experience nuisance and health related effects. Transportation impacts, including workforce commuting, equipment movement, and emergency routing, will rely on Durham boundary

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Workforce migration and associated demand for housing and human services will affect Durham communities. This requires a regional socio-economic analysis of that extends beyond Port Hope and Northumberland County. The IA should include housing demand analysis, human services pressures, and adaptive monitoring commitments that encompass Durham Region communities likely to experience indirect growth impacts.

Cumulative Effects

Durham already hosts one of the largest concentrations of nuclear infrastructure in Canada, including Pickering Nuclear Generating Station, Darlington Nuclear Generating Station, the Darlington Small Modular Reactor Project, and the Port Granby Waste Management Facility. The Wesleyville project would add another large-scale facility to this corridor. A cumulative effects assessment that reflects the regional nuclear context is necessary, particularly for emergency management, environmental monitoring, and service capacity.

Geology

The Region notes that the Initial Project Description concludes that no structural weaknesses such as faults, shear zones, or solution cavities have been identified in the site bedrock. The Region also notes that legacy underground infrastructure associated with the former oil-fired generating station, including underground storage caverns, are not depicted in the geological cross-sections or discussed in detail in the baseline description.

To support transparency and a shared understanding of baseline conditions, the Region encourages future phases of the assessment to clarify how such legacy underground features were considered in the geotechnical characterization of the site, and whether they have any relevance to proposed excavation, grading, dewatering, or foundation design.

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Altering the Lake Ontario shoreline presents numerous environmental impacts. Shoreline hardening and lake infilling at Wesleyville may alter littoral sediment transport and wave energy regimes along the north shore of Lake Ontario, with potential down-drift effects on erosion and sediment deposition processes. Changes to sediment dynamics could plausibly affect shoreline stability at the Port Granby site, including bluff areas where 800 cubic metres of marginally contaminated soils were left in place as part of the Port Granby Project remediation.

The long-term safety case for Port Granby assumes stable shoreline and erosion conditions. Any project-induced change to those conditions represents a potential interaction between the Wesleyville project and the federally regulated historic waste management facility in Clarington.

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OPG's Initial Project Description identifies several options for managing low- and intermediate-level nuclear waste from the Wesleyville project, including offsite storage at existing licensed facilities potentially in Durham Region. Because these scenarios could result in waste being transported to, processed within, or temporarily stored in Durham, it is critical that OPG engage with Durham Region and Clarington early and continuously. Canada's Radioactive Waste Policy requires open, transparent planning with early input from current and prospective host communities, yet Durham has not been engaged on any proposal involving the transport and storage of waste from an offsite facility to Durham's nuclear waste management storage sites. This gap is inconsistent with both federal policy and Durham's longstanding expectation that host communities must be full partners in decisions that affect their responsibilities and cumulative impacts.

Durham Region has a well-documented history as a nuclear host community and has consistently advocated for meaningful engagement, recognition of host responsibilities, and protection of community well-being across the full waste lifecycle. Past submissions to federal policy reviews and the Nuclear Waste Management Organization stress that additional waste burdens cannot be assumed without clear agreements, impact assessment, and appropriate mitigation. Given OPG is evaluating scenarios such as offsite processing and potential storage in Durham Region, the Impact Assessment must explicitly require early, formalized engagement with the Region and a comprehensive evaluation of host-community

implications. This is necessary to ensure alignment with Canada's policy and to uphold Durham's established Council positions on nuclear waste governance.

Cooling towers

Although technology selection will occur at later project stages, the potential inclusion of cooling towers represents a significant issue for Durham Region that must be acknowledged early in the Impact Assessment. Cooling towers would introduce a highly visible industrial feature into the Lake Ontario shoreline landscape, with structures that can be seen from long distances across Durham's waterfront communities, major transportation corridors (including Highway 401), and key public recreation areas. Their height, steam plumes, and industrial profile would materially alter public perception of the lakeshore and could contribute to the longstanding stigma associated with landmark nuclear infrastructure.

Durham Region has, for more than a decade, maintained a clear and repeatedly affirmed position opposing cooling towers for precisely these reasons. The concern is not solely aesthetic: the visibility and symbolic association of cooling towers can influence community identity, economic development potential, tourism activity, and investor confidence—particularly in areas undergoing waterfront renewal or mixed-use intensification. Introducing a highly prominent nuclear-associated feature at this location risks reinforcing negative public perceptions and contradicting established land-use planning directions, host-community expectations, and regional economic strategies.

Given the potential for cooling towers to create transboundary visual, social, and economic effects far beyond the project site, their inclusion would constitute a meaningful impact pathway under the Impact Assessment Act. Given the cumulative context of multiple nuclear facilities already present in Durham Region, the consideration of cooling towers is a matter of significant regional concern that must be explicitly addressed within the Impact Assessment process.

Engagement with Durham Region

Within the Initial Project Description, it was noted that Durham Region continues to support the work of the Durham Nuclear Health Committee (DNHC), which is comprised of residents of Durham Region and serves as a community forum primarily focused on the discussion of radiological emissions from nuclear facilities and potential environmental and human health considerations. Engagement with the DNHC should not be interpreted as engagement with Regional Council or Regional staff, nor as a substitute for formal consultation with the Region.

Conclusion

While Durham Region recognizes that the proposed project will create significant economic opportunities, including substantial local job creation and broader regional economic benefits, there will also be real and immediate pressures the project will

place on our municipal systems. In a period where municipalities are already financially constrained, this imbalance represents a meaningful impact pathway.

The Impact Assessment Act defines health as “a state of complete physical, mental, and social well-being, and not merely the absence of disease or infirmity.” Applying this lens requires a comprehensive understanding of how large infrastructure projects influence community well-being through both direct and indirect pathways. For Durham Region, the cumulative impacts associated with the proposed project create measurable pressures on the systems that support community health, including water and wastewater services, waste management, transportation networks, emergency response, long-term care, childcare, transit, and social services.

Durham Region’s Health Neighbourhoods mapping demonstrates how social, economic, environmental, and infrastructure determinants interact to shape health outcomes. The additional service demands identified throughout this submission show how these determinants may be strained as a result of project-related growth, emergency management obligations, environmental monitoring requirements, housing pressures, and increased transportation volumes. Financial impacts further reduce the Region’s ability to sustain or expand services essential to community well-being.

In this context, even a project with strong economic benefits can produce negative municipal-level impacts that are significant under the Impact Assessment Act. These impacts are not theoretical: they will emerge during construction and compound existing pressures as service demands increase without a corresponding revenue stream. A project of this scale will generate sustained demands on municipal service delivery at a time when local governments are already facing substantial infrastructure and fiscal pressures. For this reason, a broader, regionally scoped cumulative effects assessment is necessary to fully and transparently evaluate how the project will affect the overall well-being of Durham Region and Clarington residents.



February 11, 2026

New Nuclear at Wesleyville Project
Impact Assessment Agency of Canada
160 Elgin Street, 22nd Floor
Ottawa, Ontario K1A 0H3

RE: Municipality of Clarington Comments – New Nuclear at Wesleyville in Port Hope, Initial Project Description

Dear Impact Assessment Agency of Canada and the Canadian Nuclear Safety Commission,

Thank you for the opportunity to provide comments on the *New Nuclear at Wesleyville in Port Hope, Initial Project Description (IPD)*, prepared by Ontario Power Generation Inc. and released by the Impact Assessment Agency of Canada (IAAC) and the Canadian Nuclear Safety Commission (CNSC) on January 12, 2026. As an established nuclear host community located in close proximity to the proposed project site, the Municipality of Clarington is committed to actively participating in nuclear regulatory processes to safeguard the interests of our community.

The Municipality understands that Ontario Power Generation Inc. is proposing the construction of a new nuclear generating station in the Municipality of Port Hope, with a potential capacity of up to 10,000 megawatts and an operating lifespan of 78 years. Reactor technology has not yet been selected, and several designs will be considered as part of the project planning process.

The IPD provides an overview of the proposed New Nuclear at Wesleyville (NNW) project and initiates the federal Impact Assessment process. We understand that comments received on the IPD will support IAAC and CNSC in preparing a summary of issues for Ontario Power Generation Inc. and informs identifying the scope of a Federal Impact Assessment and other required activities (e.g. permitting). The Municipality of Clarington respectfully requests that the following considerations be reflected in the scope of a future Impact Assessment.

Local Context

Clarington is located immediately west (approximately 1 km) of the proposed NNW project site, making our municipality a near-neighbour with potential to experience cross-boundary impacts. While the IPD identifies Clarington as a potentially affected community, certain elements of the communities description do not fully reflect Clarington's location or context. **We therefore offer the following description to ensure the record is reflective of local conditions.**

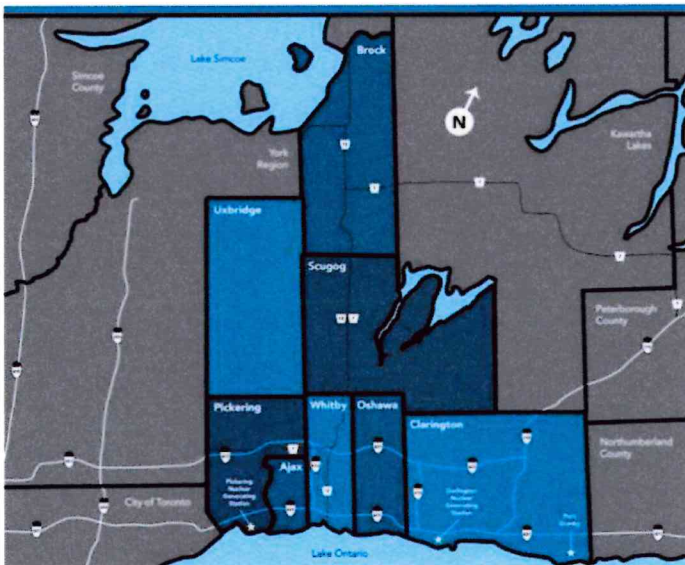
The Municipality of Clarington is a dynamic and rapidly expanding municipality situated along the shores of Lake Ontario within the Region of Durham. Clarington is

geographically large, with an area of 612km², and is a blend of rural countryside and four bustling urban areas: Courtice, Bowmanville, Newcastle and Orono. Our rural area falls within the protected Greenbelt and Oak Ridges Moraine and has thirteen hamlets which are surrounded by highly productive agricultural land and natural heritage features and systems. Approximately 110,000 people call Clarington home, and this population is expected to grow to 221,000 by 2051.

Clarington is a vibrant nuclear host community known for its thriving energy sector, picturesque green space, historic downtowns, and as a great place to raise a family. As a lower-tier municipality, Clarington is responsible for local services, including emergency and fire services, roads, community planning and development, issuing building permits, municipal law enforcement, parks and recreation, and more.

Nuclear energy has been an integral part of Clarington since the 1990's. The Darlington Nuclear Generating Station, research and development, isotope production, waste storage expertise and supply chain made our area a local hub for the nuclear industry. Clarington continues to be a forefront of nuclear progress and innovation, including being the host community for the Darlington New Nuclear Project. Clarington is also the location of the Port Granby Project, part of the Government of Canada's Port Hope Area Initiative. The Port Granby Project resulted in the relocation of approximately 1.3 million tonnes of historic low-level radioactive waste from an unstable Lake Ontario shoreline area in the southeast corner of the municipality to a new engineered above ground mound (Port Granby Long-Term Waste Management Facility).

The map below shows the location of the Darlington Nuclear Generating Station within the Municipality of Clarington and the Regional Municipality of Durham, in relation to the Greater Toronto Area and areas to the east. The NNW project site's west boundary is located approximately 1 km west of the Clarington – Port Hope municipal boundary and 1.5 km from the Port Granby Long-Term Waste Management Facility.



Map courtesy of the Region of Durham

Scope of Assessment of Impacts

As the host community to the Darlington Nuclear Generating Station, the Darlington New Nuclear Project, and the Port Granby Project and Long-Term Waste Management Facility, Clarington has substantial practical experience with the local-level implications of nuclear operations and associated responsibilities for municipal planning, service delivery, infrastructure, and long-term community management. While the proposed NNW project site lies outside of the Municipality of Clarington's jurisdiction, given our close proximity, it is important for the Municipality to understand whether these responsibilities may extend beyond the borders of the host community and into Clarington.

In addition to the economic opportunities, review of the IPD by the Region of Durham (Attached) identifies several potential impact pathways for the NNW project that may extend into the Municipality of Clarington and Region of Durham, and include:

- Emergency planning and management;
- Land use planning and development restrictions;
- Transportation and infrastructure needs and pressures;
- Local housing and other municipal service supports supports;
- Construction and operations-related nuisance effects (e.g. dust, noise);
- Offsite transportation and storage of radioactive waste; and
- Public communications and issues management.

The Municipality of Clarington supports the Region of Durham's identification of several potential cross-boundary impacts that warrant consideration within the Impact Assessment. **We request that IAAC and CNSC ensure the scope of assessment fully captures impacts to Clarington and Durham Region, as well as for the host community, both positive and negative.**

Municipal Governance and Capacity

Clarington also supports the Region of Durham's position regarding municipal capacity and governance considerations. Local municipalities face significant challenges in participating meaningfully in complex regulatory and licencing processes. Despite being integral parties in the nuclear regulatory process, municipalities are often operating within resource and capacity constraints that limit the extent to which they can participate.

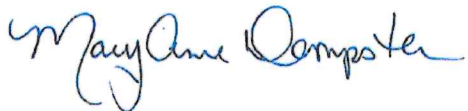
Clarington already dedicates substantial resources to supporting the Darlington Nuclear Generating Station, Darlington New Nuclear Project, and Port Granby Project. **We request that an Impact Assessment examine cumulative impacts on municipal capacity, where relevant, and ensure that any expectations placed on Clarington are accompanied by appropriate, fair, and sustainable resource supports.**

In closing

The Municipality of Clarington is proud of its longstanding collaborative relationship with Ontario Power Generation Inc. and its role as a leader in the nuclear sector. As the Impact Assessment process progresses, we will continue to participate to understand the potential implications for Clarington, including expectations placed on the Municipality and implications for our community. We look forward to continued collaboration to ensure Clarington's interests are represented and our community remains protected throughout this process.

We appreciate the opportunity to provide comments; should you have any questions, please contact Amy Burke, Supervisor, Strategic Projects, at 905-623-3379 ext. 2423 or aburke@clarington.net.

Yours truly,



Mary-Anne Dempster
Chief Administrative Officer

Cc: Mayor and Council Members
Executive Leadership Team
Regional Municipality of Durham
Canadian Association of Nuclear Host Communities

Encl.



Sent by Email

February 11, 2026

**The Regional
Municipality of
Durham**

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John Henry
Regional Chair and
CEO

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Impact Assessment Agency of Canada
160 Elgin Street, 22nd Floor
Ottawa, Ontario K1A 0H3
Telephone: 343-596-8128
Email: wesleyville@iaac-aeic.gc.ca

Re: Initial Project Description for the New Nuclear at Wesleyville Project

Dear Impact Assessment Agency of Canada,

The Regional Municipality of Durham ('Durham Region') appreciates the opportunity to comment on the Initial Project Description for Ontario Power Generation's (OPG) proposed New Nuclear at Wesleyville Project. We support Ontario's efforts to expand clean, reliable electricity generation capacity and we recognize the important role that new nuclear development will play in meeting the province's long-term energy needs. Our staff have participated in early interviews to support OPG's socio-economic assessment of the Wesleyville Project and have invited OPG to brief Regional Council as part of our ongoing commitment to participation in the nuclear sector.

Our review of the 350-page Initial Project Description identified several opportunities to address gaps to the assessments "preliminary real and potential impacts." Although the Initial Project Description is an early-stage planning document, its framing establishes the study areas, the jurisdictions considered affected, and ultimately the scope of the Impact Assessment. Clear and accurate geographic and jurisdictional assumptions at this stage are essential.

The Region is concerned to see that neither Durham Region nor Clarington is identified in Section 4.3.4 as a jurisdiction with powers, duties, or functions related to the assessment of potential effects. Both levels of municipal government share environmental, labour market, housing, transportation, public health and emergency response responsibilities (including police, paramedic services and fire services) with the Wesleyville area, and both will hold legislated obligations

directly related to the Wesleyville Nuclear Generating Station under Ontario's nuclear policy and Provincial Nuclear Emergency Response Plan (PNERP). With the proposed generating station located approximately one kilometre from our communities, any transboundary effects will directly affect our jurisdictions. **Accordingly, we request formal recognition of Durham Region and Clarington as affected jurisdictions within the Impact Assessment process.**

We also note key differences between the framing of the Wesleyville Initial Project Description and the approach used for the Bruce C Project. Bruce Power situates its project within a broader regional context, acknowledging shared water bodies, transportation networks, labour and housing markets, and cumulative environmental systems. In recognition of the regional impacts of a project of this scale, Bruce Power has also provided multi year funding to Bruce County, The Municipality of Kincardine, and the neighbouring Town of Saugeen Shores to support their meaningful participation in the IA process, including funding for new staff positions at each municipality and studies related to workforce impacts and growth management.

In contrast, OPG's Wesleyville Initial Project Description adopts a much narrower scope focused primarily on the Municipality of Port Hope and Northumberland County, without adequately extending the assessment lens or funding to adjacent Durham Region and Clarington despite the immediate proximity and high degree of regional interconnectedness.

A narrow framing risks underestimating socioeconomic effects, limiting study areas, and overlooking cumulative effects along the Lake Ontario nuclear corridor. These are not abstract risks—they reflect how environmental, labour, transportation, and emergency management systems function in practice. Early and ongoing engagement will allow our municipalities to understand expected local impacts, identify pressures on infrastructure and services, and position our communities to access upper-level government programs designed to support economic development and regional resilience.

The attached document outlines the key gaps in the Initial Project Description, including emergency management responsibilities, financial impacts, land use and planning implications, cross-boundary effects, geological considerations, shoreline alteration, nuclear waste management, and cumulative impacts. Each of these areas requires early, clear, and comprehensive assessment to ensure an accurate understanding of how the project will interact with municipal systems and responsibilities.

Durham Region remains supportive of nuclear generation as a key component of Ontario's clean, reliable energy system, and we have confidence in OPG's proven ability to safely construct and operate nuclear facilities. Our intent is to support a strong and complete Impact Assessment by offering constructive analysis and by ensuring that the assessment reflects the realities of regional infrastructure, service

delivery, and community well-being. Given our proximity to the project site, the statutory responsibilities that will arise directly from this development, and the clear cross-boundary environmental and social interactions involved, Durham Region and Clarington must be fully considered as affected jurisdictions throughout the Impact Assessment process.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Henry', written in a cursive style.

John Henry

Regional Chair and CEO

Attachment: Regional Municipality of Durham Assessment of the Initial Project Description for the proposed New Nuclear at Wesleyville Project

Regional Municipality of Durham Assessment of the Initial Project Description for the proposed New Nuclear at Wesleyville Project

Introduction and executive summary

The Regional Municipality of Durham ('Durham Region') has reviewed Ontario Power Generation's Initial Project Description for the proposed New Nuclear at Wesleyville Project. While the Initial Project Description is an early-stage planning document, its framing determines study boundaries, affected jurisdictions, and ultimately the scope of the federal Impact Assessment. Our review identifies several significant gaps in how the Initial Project Description interprets and presents the "preliminary real and potential impacts of the project."

Given Durham Region and Clarington's proximity (approximately one kilometre from the proposed generating station) and the statutory responsibilities both municipalities hold under provincial nuclear emergency planning and service-delivery frameworks, the Initial Project Description must recognize our jurisdictions as directly affected. The narrow geographic framing currently applied overlooks the integrated environmental, transportation, labour, housing, emergency management, and infrastructure systems that connect our communities with the Wesleyville area.

Key gaps include:

- **Emergency Management:** Large portions of the legislated emergency planning zones fall within Durham Region and Clarington, creating mandatory operational responsibilities that must be assessed within the federal process.
- **Financial Impacts:** Durham and Clarington will bear significant service and infrastructure costs but will not receive property tax or payment-in-lieu revenues from the facility, resulting in fiscal imbalance.
- **Land Use and Planning:** Required Canadian Nuclear Safety Commission (CNSC) restrictions will limit development potential on lands within the Automatic Action Zone, including privately owned parcels.
- **Cross-Boundary Effects:** Construction-related impacts, transportation pressures, workforce in-migration, and active transportation disruptions will extend into Clarington and Durham Region and require regional assessment.
- **Cumulative Impacts:** Durham already hosts extensive nuclear infrastructure, necessitating a broader cumulative effects lens.

- Geology and Shoreline Alteration: Legacy subsurface features and potential shoreline changes warrant further clarification due to interactions with nearby regulated sites.
- Nuclear Waste Management: Any scenario involving transport, processing, or storage of waste within Durham Region requires early, formal engagement.
- Cooling Towers: Durham Region Council has a long-standing position opposing design options with cooling towers as a matter of social and economic impact.

Across all topic areas, the overall concern is that the current Initial Project Description does not sufficiently reflect the interconnected regional context or the statutory obligations that will fall to Durham Region and Clarington as neighbouring municipalities with established nuclear-related responsibilities. A regionally scoped assessment, supported by appropriate baseline data, modelling, and consultation, is required to ensure accuracy, transparency, and alignment with both municipal and federal expectations.

The following sections provide a more detailed analysis of key issues identified in OPG's assessment of "preliminary real and potential impacts of the project." This summary is intended to support a more complete and accurate understanding of the project's potential effects and to reinforce the need for these considerations to be addressed early in the Impact Assessment process.

Emergency Management

Municipalities have defined statutory responsibilities under the Provincial Nuclear Emergency Response Plan (PNERP). These responsibilities include the provision of evacuation support, reception centres, public health programs such as potassium iodide distribution, emergency communications, police, paramedic services, fire services, and emergency social services. For Pickering Nuclear Generating Station and Darlington Nuclear Generating Station, Durham Region is also responsible for operating and maintaining the nuclear public alerting system, including nuclear sirens and auto dialler system due to specific nuclear planning zone responsibilities. A significant portion of the legislated emergency planning zones for the Wesleyville station, including the automatic action zone and detailed planning zones, are within Durham Region and Clarington and will have specific emergency management requirements. These are not optional or speculative obligations. Emergency planning assumptions, service demands, infrastructure requirements, and cost implications must be assessed during the Impact Assessment stage. They are not within the scope of the CNSC's mandate.

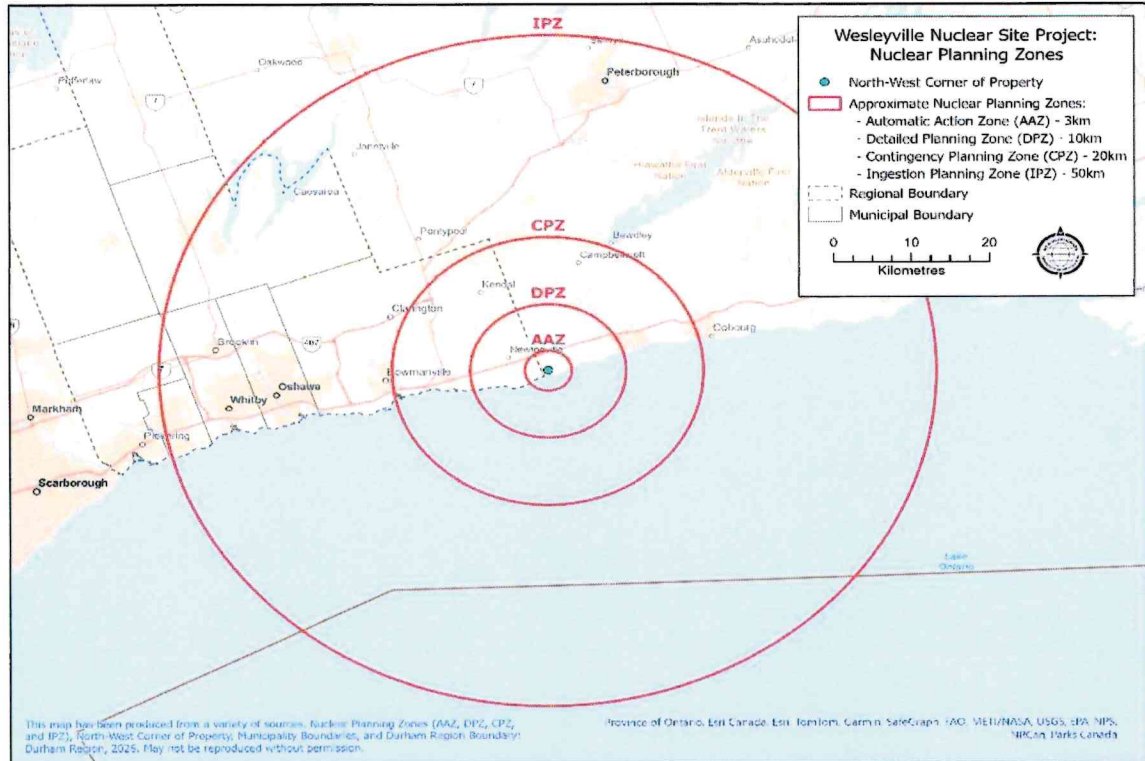


Figure 1: An estimate of the Automatic Action Zone (AAZ), Detailed Planning Zone (DPZ), Contingency Planning Zone (CPZ), and Ingestion Planning Zone (IPZ) for the Wesleyville Nuclear Generating Station.

Financial Impacts: Service impacts

Durham Region and Clarington will bear major infrastructure, communications, and service delivery costs associated with the construction and operation of the Wesleyville station but will not receive property tax or payments in lieu (PILs) revenue from the facility. The Municipality of Port Hope and Northumberland County will receive the fiscal benefit, while Durham Region and Clarington will absorb a disproportionate share of operational responsibility. The Impact Assessment must acknowledge this financial asymmetry and assess its implications for fiscal equity and economic impacts on Durham Region and Clarington. Impact mitigation mechanisms must address the gap between operational obligations directly attributable to this project and its revenue base. Project-related funding needs to be provided to all municipalities with statutory responsibilities.

Durham Region has consistently advocated that communities should not shoulder the operational burden of federally regulated projects without corresponding financial arrangements. The Impact Assessment must consider the need for formal impact mitigation and service arrangements with affected municipalities including Clarington and Durham Region, such as a Host Community Agreement or Regional Impacts and Services Agreement, as a potential mitigation measure.

If you require this information in an accessible format, please contact Communications and Engagement at CorporateCommunications@durham.ca or 311, extension 3743.

Financial Impacts: Historic fiscal arrangements with existing nuclear host communities

As Ontario enters a new nuclear build cycle, it is critical that historic fiscal arrangements that limited the municipal benefit of hosting nuclear generation not be replicated. Past electricity-sector financing structures directed payments associated with nuclear facilities, including payments in lieu of property taxes, toward servicing provincial liabilities arising largely from earlier nuclear construction cost overruns. While this approach addressed provincial financial pressures at the time, it resulted in host communities accommodating major provincial infrastructure while receiving less direct fiscal benefit than is typical for large industrial facilities.

Durham Region views the current period as a policy transition point. New nuclear development, including the proposed Wesleyville facility, must be financed through structures that do not reintroduce mechanisms whereby project costs, overruns, or associated liabilities are managed in ways that continue to direct debt repayment to host community property taxpayers. Payments associated with new nuclear facilities should flow to host municipalities in a manner comparable to industrial property taxation, reflecting the infrastructure, land use, emergency services, and growth management responsibilities borne locally.

The Province has recently recognized the importance of municipal hosting arrangements through dedicated funding commitments to new host communities in connection with new nuclear proposals. Durham Region supports this direction but emphasizes that all host municipalities must be equitably included in emerging fiscal and funding frameworks. This matter is raised as a question of municipal fiscal sustainability and intergovernmental fairness, not as a matter of support for nuclear generation, which remains an important component of Ontario's clean energy future.

Land Use Restrictions

Restrictions on future development of sensitive land uses (e.g., residential development) within the Automatic Action Zone will have implications for affected area municipalities and immediate landowners. While a portion of the lands within this area in Clarington is owned by Atomic Energy of Canada Limited (AECL), there are also privately owned lands that would be subject to new constraints on permitted uses, as required by the CNSC. These restrictions will require amendments to Clarington's Official Plan and will limit the types of development or land uses available to affected private landowners.

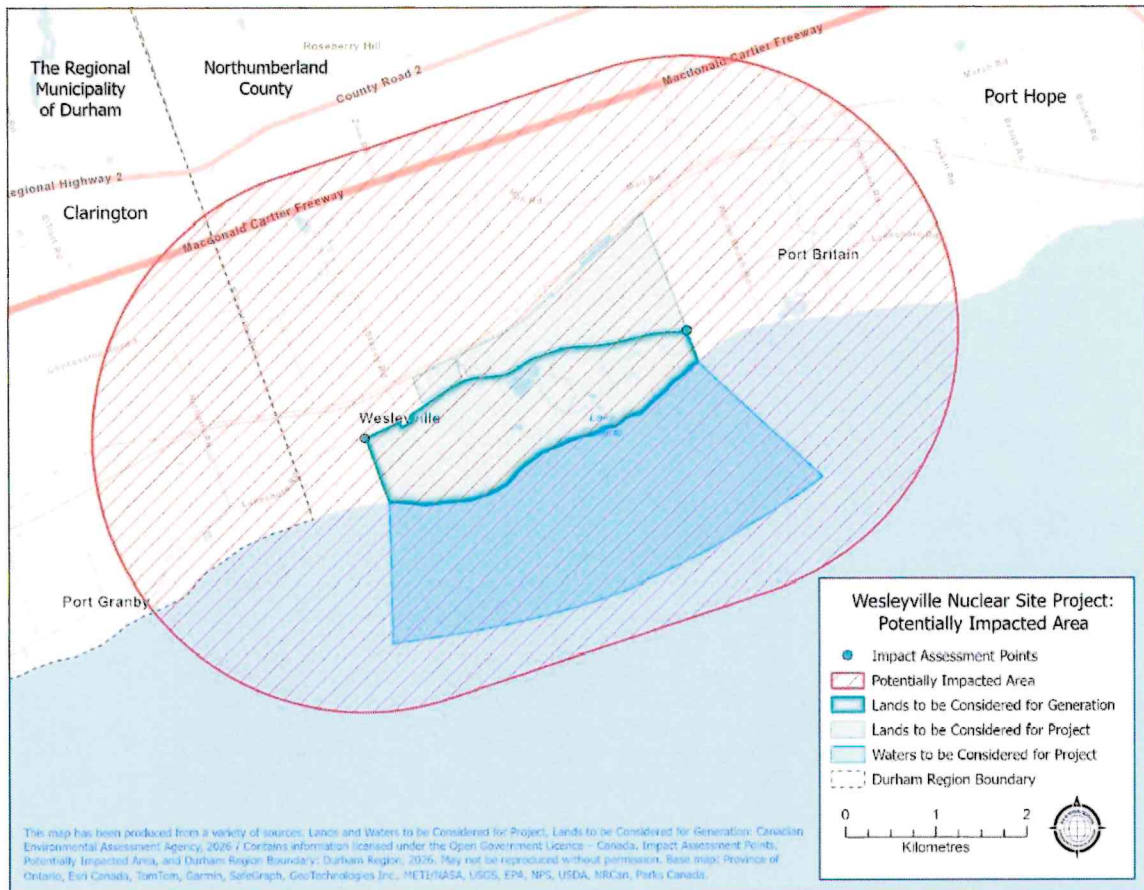


Figure 2: An estimate of the possible extent of area that would be impacted by land use restrictions as required by the CNSC. The actual area would be determined based on placement of the nuclear generating station within the lands being considered for generation.

Private Wells

The site is not within a source protection area; however, private wells exist nearby. OPG should confirm whether they have assessed the nearby private wells including those within Durham Region and determined that they are sufficiently distant from the site to avoid any potential impacts.

Cross-Boundary Impacts

Construction related dust, noise, vibration, and air quality impacts will not stop at municipal boundaries. Adjacent rural communities and agricultural lands may experience nuisance and health related effects. Transportation impacts, including workforce commuting, equipment movement, and emergency routing, will rely on Durham Region and Clarington’s transportation network. The Waterfront Trail, which

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The Region notes that the Initial Project Description concludes that no structural weaknesses such as faults, shear zones, or solution cavities have been identified in the site bedrock. The Region also notes that legacy underground infrastructure associated with the former oil-fired generating station, including underground storage caverns, are not depicted in the geological cross-sections or discussed in detail in the baseline description.

To support transparency and a shared understanding of baseline conditions, the Region encourages future phases of the assessment to clarify how such legacy underground features were considered in the geotechnical characterization of the site, and whether they have any relevance to proposed excavation, grading, dewatering, or foundation design.

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Altering the Lake Ontario shoreline presents numerous environmental impacts. Shoreline hardening and lake infilling at Wesleyville may alter littoral sediment transport and wave energy regimes along the north shore of Lake Ontario, with potential down-drift effects on erosion and sediment deposition processes. Changes to sediment dynamics could plausibly affect shoreline stability at the Port Granby site, including bluff areas where 800 cubic metres of marginally contaminated soils were left in place as part of the Port Granby Project remediation.

The long-term safety case for Port Granby assumes stable shoreline and erosion conditions. Any project-induced change to those conditions represents a potential interaction between the Wesleyville project and the federally regulated historic waste management facility in Clarington.

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OPG's Initial Project Description identifies several options for managing low- and intermediate-level nuclear waste from the Wesleyville project, including offsite storage at existing licensed facilities potentially in Durham Region. Because these scenarios could result in waste being transported to, processed within, or temporarily stored in Durham, it is critical that OPG engage with Durham Region and Clarington early and continuously. Canada's Radioactive Waste Policy requires open, transparent planning with early input from current and prospective host communities, yet Durham has not been engaged on any proposal involving the transport and storage of waste from an offsite facility to Durham's nuclear waste management storage sites. This gap is inconsistent with both federal policy and Durham's longstanding expectation that host communities must be full partners in decisions that affect their responsibilities and cumulative impacts.

Durham Region has a well-documented history as a nuclear host community and has consistently advocated for meaningful engagement, recognition of host responsibilities, and protection of community well-being across the full waste lifecycle. Past submissions to federal policy reviews and the Nuclear Waste Management Organization stress that additional waste burdens cannot be assumed without clear agreements, impact assessment, and appropriate mitigation. Given OPG is evaluating scenarios such as offsite processing and potential storage in Durham Region, the Impact Assessment must explicitly require early, formalized engagement with the Region and a comprehensive evaluation of host-community

implications. This is necessary to ensure alignment with Canada's policy and to uphold Durham's established Council positions on nuclear waste governance.

Cooling towers

Although technology selection will occur at later project stages, the potential inclusion of cooling towers represents a significant issue for Durham Region that must be acknowledged early in the Impact Assessment. Cooling towers would introduce a highly visible industrial feature into the Lake Ontario shoreline landscape, with structures that can be seen from long distances across Durham's waterfront communities, major transportation corridors (including Highway 401), and key public recreation areas. Their height, steam plumes, and industrial profile would materially alter public perception of the lakeshore and could contribute to the longstanding stigma associated with landmark nuclear infrastructure.

Durham Region has, for more than a decade, maintained a clear and repeatedly affirmed position opposing cooling towers for precisely these reasons. The concern is not solely aesthetic: the visibility and symbolic association of cooling towers can influence community identity, economic development potential, tourism activity, and investor confidence—particularly in areas undergoing waterfront renewal or mixed-use intensification. Introducing a highly prominent nuclear-associated feature at this location risks reinforcing negative public perceptions and contradicting established land-use planning directions, host-community expectations, and regional economic strategies.

Given the potential for cooling towers to create transboundary visual, social, and economic effects far beyond the project site, their inclusion would constitute a meaningful impact pathway under the Impact Assessment Act. Given the cumulative context of multiple nuclear facilities already present in Durham Region, the consideration of cooling towers is a matter of significant regional concern that must be explicitly addressed within the Impact Assessment process.

Engagement with Durham Region

Within the Initial Project Description, it was noted that Durham Region continues to support the work of the Durham Nuclear Health Committee (DNHC), which is comprised of residents of Durham Region and serves as a community forum primarily focused on the discussion of radiological emissions from nuclear facilities and potential environmental and human health considerations. Engagement with the DNHC should not be interpreted as engagement with Regional Council or Regional staff, nor as a substitute for formal consultation with the Region.

Conclusion

While Durham Region recognizes that the proposed project will create significant economic opportunities, including substantial local job creation and broader regional economic benefits, there will also be real and immediate pressures the project will

place on our municipal systems. In a period where municipalities are already financially constrained, this imbalance represents a meaningful impact pathway.

The Impact Assessment Act defines health as “a state of complete physical, mental, and social well-being, and not merely the absence of disease or infirmity.” Applying this lens requires a comprehensive understanding of how large infrastructure projects influence community well-being through both direct and indirect pathways. For Durham Region, the cumulative impacts associated with the proposed project create measurable pressures on the systems that support community health, including water and wastewater services, waste management, transportation networks, emergency response, long-term care, childcare, transit, and social services.

Durham Region’s Health Neighbourhoods mapping demonstrates how social, economic, environmental, and infrastructure determinants interact to shape health outcomes. The additional service demands identified throughout this submission show how these determinants may be strained as a result of project-related growth, emergency management obligations, environmental monitoring requirements, housing pressures, and increased transportation volumes. Financial impacts further reduce the Region’s ability to sustain or expand services essential to community well-being.

In this context, even a project with strong economic benefits can produce negative municipal-level impacts that are significant under the Impact Assessment Act. These impacts are not theoretical: they will emerge during construction and compound existing pressures as service demands increase without a corresponding revenue stream. A project of this scale will generate sustained demands on municipal service delivery at a time when local governments are already facing substantial infrastructure and fiscal pressures. For this reason, a broader, regionally scoped cumulative effects assessment is necessary to fully and transparently evaluate how the project will affect the overall well-being of Durham Region and Clarington residents.



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.