

June 23, 2026

CD# NG101-CORR-00521-00003

Alderville First Nation

Curve Lake First Nation

Hiawatha First Nation and;

The Mississaugas of Scugog Island First
Nation

Larry Shuter

Senior Policy Analyst,

Consultation Operations Division

Impact Assessment Agency of Canada

Larry.Shuter@iaac-aeic.gc.ca

RE: Updated comments from OPG on Draft Integrated Tailored Impact Statement Guidelines

OPG thanks the Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations (MS-WTFNs) for ongoing discussions regarding OPG's response and proposed revisions to the Impact Assessment Agency of Canada (IAAC) regarding the Draft Integrated Tailored Impact Statement Guidelines (TISGs) and Draft Plans. OPG appreciates the opportunity to respond to MS-WTFNs' feedback and to continue constructive discussions to gain a better understanding of MS-WTFNs' priorities and expectations regarding the TISGs and the Impact Assessment (IA) process. The intent of this letter is to provide additional context regarding OPG's tailoring recommendations and to clarify the rationale underlying those submissions.

Purpose of OPG's Response to the Draft TISGs:

OPG's response to IAAC on the Draft TISGs was intended to improve clarity regarding the IA process and to identify opportunities to support an efficient IA process for the New Nuclear at Wesleyville Project in Port Hope (NNW Project) while maintaining the rigour and integrity of the IA.

Project Stage and Regulatory Context:

The NNW Project is in the Planning Phase of the IA, and the project remains at an early stage focused on feasibility. OPG recognizes the importance of ensuring that the IA framework is rigorous, clear, and enforceable, particularly given the long-term nature of the NNW Project and its potential to operate over many decades. At the same time, OPG is seeking a framework that is both robust and feasible at this stage of project development. Some of OPG's proposed edits to the Draft TISGs were intended to reflect project-stage uncertainty, avoid duplication with existing

regulatory requirements, and ensure that commitments are scoped and tied to what can be meaningfully assessed at the IA stage.

Should the NNW Project proceed, OPG recognizes that the regulatory lifecycle would span decades and that not all issues, concerns, or data needs can be addressed through a single process at a single point in time, particularly where information becomes available only as design advances or where regulatory decisions are sequenced. OPG acknowledges that the IAAC-led IA process may be constrained in addressing the full extent of priorities and concerns of MS-WTFNs, however, it will result in foundational information and decisions that could inform future regulatory processes. As a result, OPG remains open to early inclusion of Indigenous Knowledge and direct input by MS-WTFNs into the IAAC-led IA process.

As a nuclear project, the NNW Project would be subject to lifecycle regulation by the Canadian Nuclear Safety Commission (CNSC) and would involve future licensing, permitting, and authorization processes, in addition to any legally binding conditions arising from the federal IA process and further work as part of MS-WTFNs Indigenous-led assessment. These future stages of project planning are not substitutes for IA. However, they are formal pathways through which MS-WTFNs concerns can continue to be addressed as the project advances and more detailed information becomes available.

Review of MS-WTFNs' Comments on OPG's Tailoring Recommendations:

OPG has carefully considered the priorities and perspectives of the MS-WTFNs through ongoing discussion that has taken place, including meeting with the MS-WTFNs on June 1, 4, and 11, 2026. OPG appreciates the significant time, effort, and expertise that the MS-WTFNs have brought to reviewing the draft TISGs and providing detailed comments throughout the planning phase.

OPG recognizes that the issues raised by the MS-WTFNs reflect broader considerations regarding the integration of Indigenous Knowledge, Nation-led assessment processes, Indigenous-defined concepts and terminology, significance frameworks, and ecological baseline requirements within the IA process. OPG remains committed to fully considering and integrating Indigenous Knowledge and direct input of the MS-WTFNs into the IA, where it is provided and permission is granted, in keeping with the principles of the Knowledge and Data Sharing Agreement. OPG encourages Rights-holding First Nations to provide direct input throughout the IA process, recognizing they are best placed to assess the potential impacts of the NNW Project to communities, including cumulative effects.

OPG welcomes Indigenous Knowledge and direct input by Rights-holding First Nations into OPG's IA, as it can increase the depth and rigour of the characterization and assessment of impacts. It can create greater opportunity to strengthen alignment between IAAC-led and Nation-led processes and allow OPG to proactively respond to the priorities and concerns of Rights-holding First Nations as part of the Planning and future phases of the IA, and full project lifecycle.

OPG remains open to discussions with the MS-WTFNs to understand how the findings of the Nation-led IA can be better integrated into the IA process and future phases of the project. OPG remains committed to respectful collaboration with the MS-WTFNs.

For clarity and ease of reference, OPG has organized its review of the MS-WTFNs' comments into three categories in Table 1:

- **Accepted comments:** OPG has accepted the position advanced by the MS-WTFNs as part of ongoing discussions for 43 comments. These comments are highlighted in green.
- **Comments with revised markups and additional rationale:** For 20 comments, OPG has proposed revisions to its original tailoring recommendations submitted to IAAC on May 7, 2026, along with additional rationale for IAAC and the MS-WTFNs. These comments are highlighted in yellow.
- **Comments where OPG maintains its tailoring recommendation:** For 16 comments, OPG maintains its original tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process. These comments are highlighted in blue.

The three bullets above characterize OPG's current assessment and understanding of the status of discussions regarding OPG's proposed revisions and response to the Draft TISGs. OPG welcomes future opportunities to work with the MS-WTFNs to validate this status, including working collaboratively to find mutually agreeable resolution to details that remain unresolved within and beyond the IA process. This may include addressing such details through downstream regulatory processes and/or other processes that may be identified and developed between OPG and MS-WTFNs with the goal of meaningfully addressing MS-WTFNs priorities and perspectives.

Engagement and Process Timelines:

OPG appreciates the opportunity to respond to MS-WTFNs' feedback and to continue constructive discussions to gain a better understanding of MS-WTFNs' priorities and expectations of the IA process. OPG followed IAAC's 30-day comment period for the draft integrated Tailored Impact Statement Guidelines and provided the completed advanced draft as soon as it was available.

Recognizing the tight timelines associated with the Planning Phase, OPG initiated discussions on November 13, 2025, regarding preferred approaches for engagement. OPG also sought MS-WTFNs' input on engagement preferences for the draft integrated Tailored Impact Statement Guidelines on December 11, 2025, and followed up by email on January 29, 2026, with a focus on engagement related to preparation of the Response to the Summary of Issues.

Ongoing Collaboration and Next Steps:

OPG remains committed to working collaboratively with the MS-WTFNs throughout the project lifecycle, including the Planning Phase and subsequent phases of the IA process, subsequent

licensing phases, as well as through operations and decommissioning. OPG recognizes the importance of ongoing discussions regarding Nation-led assessment approaches and the opportunities those processes may provide for identifying and communicating Indigenous priorities, values, perspectives, and knowledge systems related to the process. OPG appreciates the leadership shown by the MS-WTFNs in advancing these discussions and remains committed to engaging in a respectful and transparent manner as these conversations continue.

OPG looks forward to continuing dialogue with the MS-WTFNs, IAAC, and the CNSC regarding how information generated through engagement activities, Indigenous Knowledge processes, and potential Nation-led assessment initiatives may inform the assessment process. OPG remains committed to supporting meaningful participation and maintaining open lines of communication as we advance through the process together.

OPG has been grateful for the opportunity to discuss the contents of this letter with the MS-WTFNs. At the Nations convenience OPG remains available to answer questions, provide clarification, and continue dialogue on the matters raised. OPG values the ongoing engagement with the MS-WTFNs and looks forward to working together in a respectful, transparent, and collaborative manner as the NNW Project proceeds through the IA process, future regulatory stages, as well as during operations and decommissioning.

Sincerely,



Cammie Cheng
Director
Nuclear Environment Projects Support
Ontario Power Generation Inc.

Attachment on the following page: Updated comments from OPG on Draft Integrated Tailored Impact Statement Guidelines

cc: Aimee Rupert, Canadian Nuclear Safety Commission
Nicole Simon, Canadian Nuclear Safety Commission

Attachment: Updated comments from OPG on Draft Integrated Tailored Impact Statement Guidelines

Table 1: Updated OPG comments following feedback from discussions between MS-WTFN and OPG to update IAAC on Draft Integrated Tailored Impact Statement Guidelines

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
2(I)	N/A	N/A	II. Integrate the Generic Requirements for Impact Statements applicable to the Project into the Integrated TISG to best support clear, traceable and appropriately tailored guidance on expectations for the Project. A single document outlining all expected requirements reduces potential for misalignment should the generic requirements change or where language between the Integrated TISG and the generic requirements may overlap in scope. Recommendations on tailoring for clauses in the Generic Requirements for Impact Statements (August 2025 - interim version) have been shared in Table 1. Should tailoring and inclusion not be accepted, the version of the Generic Requirements to be applied to the Impact Statement should be specified in the Integrated TISG, namely the current version dated August 2025 (interim).	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	OPG's recommendation to integrate the project-specific guidelines with the generic requirements for Impact Statements on IAAC's website was intended to create a single, consolidated set of guidance for the NNW Project, improving clarity and traceability while reducing the potential for misalignment. OPG understands that the MS-WTFNs have raised concerns related to OPG's tailoring recommendations on both the generic and project-specific requirements, but the MS-WTFNs indicated that consolidating the documents for clarity may be reasonable. Where OPG anticipates it is unable to meet guidelines or they required adjustments, OPG understands that it is the preference of MS-WTFNs for justification to be provided as part of the Impact Statement (e.g., explanation that required data sources not within proponent control/ownership were not available during the Impact Statement phase).

¹ The following colour categories are used:

(No Highlight) OPG did not match specific feedback from MS-WTFN – Maintains OPG original tailoring recommendation made May 7th.

(Green Highlight) OPG accepts MS-WTFNs position, in the interest of collaboration and relationship-building.

(Yellow Highlight) OPG partially accepts MS-WTFNs position and has proposed revisions to its original tailoring recommendations submitted to IAAC on May 7, 2026, along with additional rationale.

(Blue Highlight) OPG maintains its original tailoring recommendation submitted to IAAC on May 7, 2026, along with additional rationale.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG’s Proposed Updates to Draft TISG Text
2(II)	N/A	N/A	II. OPG wishes to recognize and respect that First Nations and other Indigenous communities may choose not to share Knowledge or community goals with OPG. OPG will consider all information provided to it by Rights-holding First Nations and interested Indigenous communities for the expressed purpose of use as an input to the Impact Statement development. Where Indigenous Knowledge is chosen by Rights-holding and interested Indigenous Nations to be shared for use in the Impact Statement, OPG will receive, record (where agreed), and reflect it in a culturally appropriate way that follows community protocols (to the extent provided to OPG) and Indigenous methodologies, and consider it alongside scientific and technical information. OPG acknowledges that Indigenous Knowledge used by OPG remains the ownership of the Knowledge holder(s) (not OPG), and any use, access, storage, or disclosure by OPG will be guided by Nation/community-specific knowledge sharing agreements, arrangements, or protocols (where in place) and is subject to prior informed permission for any inclusion, summary, or reference. For clarity, when referencing information from Rights-holding First Nations and interested Indigenous communities, OPG recommends the use throughout the TISG and related Plans of appropriate qualifiers (such as “as available” and/or “where provided for use”), consistent with any applicable conditions and permissions.	OPG is proposing revision to its original recommendation related to the yellow highlighted text, based on MS-WTFNs position: 1.1 - Scope of the Impact Statement ... IAAC recognizes and respects that First Nations and other Indigenous communities may choose not to share Knowledge or community goals for use in the proponent’s Impact Statement. Where contributions from Rights-holding First Nations and interested Indigenous Communities are included in the guidelines, the proponent will consider all information provided to it by Rights-holding First Nations and interested Indigenous communities for the expressed purpose of use as an input to the Impact Statement development. Additionally, OPG has accepted the suggestion from MS-WTFNs to delete the qualifiers (e.g. “where available”) and include the caveat statement suggested by the MS-WTFNs as follows: OPG will provide its own understanding of potential impacts to First Nations and other Indigenous communities, including their Rights and interests. This understanding must be developed through engagement with First Nations and other Indigenous communities, who will be provided with meaningful opportunity to respond and request revisions to OPG’s interpretation. OPG will equally consider and integrate any Indigenous Knowledge and input from First Nations and Indigenous communities where is it made available to OPG for this purpose.	Indigenous Knowledge and Data sharing agreement is signed with the MS-WTFNs for the length of the IA. OPG requires Nations’ permission to use Indigenous Knowledge publicly. In discussion with MS-WTFNs, it is OPG’s understanding that there is general agreement on the need for an explanatory paragraph to be added to the beginning of the Integrated TISGs to acknowledge this. This principle must be acknowledged wherever contributions of Indigenous Knowledge are cited to meet requirements; a draft statement has been included for consideration in section 1.1 Scope of the Impact Statement.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG’s Proposed Updates to Draft TISG Text
2(III)	N/A	N/A	III. It is OPG’s understanding that the use of chosen terms such as ‘ Relatives ’ is not appropriate. OPG encourages readers to refer to the Initial Project Description (IPD), Section iii, Glossary of Process Term Changes to understand the context and terms chosen by Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations (MS-WTFNs) in the IPD.	Relatives to be replaced with <u>Species as well as other aspects that are identified in footnote X.</u> Footnote X: Species as well as other aspects that are identified in XX (footnote number) including; human and non-human Beings, such as the Land, Air, Waters, and all Animal, Plant, Bird, Fish, and Little Spirit Beings (Relatives). It acknowledges worldviews that hold that all beings are Related and encompasses cultural and spiritual relationships with place.	OPG feedback is directed solely to OPG's use of terms within the OPG content in the IAAC-led Impact Statement. OPG appreciates the collaborative discussion with MS-WTFN in development of the suggestion for appropriate language to be used by OPG.
2(IV)	N/A	N/A	IV. The proponent is expected to meet the requirements set out in the TISG; however, flexibility can be exercised in the methods and approaches used to achieve these requirements. Where the proponent considers that an alternative approach or methodology would achieve the same intent, a risk-based approach to collecting data reflective of an assessment of potential interactions during the Impact Statement phase will be followed. Based on the findings of the assessment, predictions can be validated over a longer time period for those effects of concern identified during the Impact Assessment phase.	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	OPG's effects assessment, including models, will be based on conservative assumptions and will incorporate views shared by the MS-WTFNs, government reviewers, and key stakeholders. OPG intends to leverage future processes, such as the follow-up program, to validate those assumptions. As outlined in Section 1.4 of the draft Integrated Guidelines, "Where the proponent considers that certain information or studies may be generated progressively over time, they should clearly demonstrate how the information available at the integrated assessment stage is sufficient to support sound conclusions and decision-making. This includes explaining how any remaining uncertainties will be understood and managed, and how subsequent information would be incorporated in a manner that maintains the integrity and objectives of the assessment." For quantitative models supporting this assessment (groundwater flow models, lake models) additional monitoring for existing site-specific seasonal data to use in validation of the model outcomes may continue beyond initial modelling scenarios. The recommended tailoring of clauses is intended to recognize this.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG’s Proposed Updates to Draft TISG Text
2(V)	N/A	N/A	V. OPG is proposing the removal of the "with and without" clause , as it would require development of a hypothetical counterfactual scenario that is not necessary in all cases to support a robust assessment of project and cumulative effects, and may introduce uncertainty where assumptions about future land use and activities cannot be substantiated. This is particularly relevant in the Municipality of Port Hope, where the NNW Project site is already designated for power generation and the surrounding area is experiencing ongoing urbanization, such that a single “without project” scenario may be difficult to define consistently and could distract from evaluating clearly attributable effects and effective mitigation. Making “with and without” comparisons a standard requirement can also increase effort and documentation across valued components without a commensurate improvement in decision-relevant information. Instead, OPG suggests requiring effects assessment relative to existing conditions, incorporating reasonably foreseeable changes and other physical activities for cumulative effects, and providing a “without the project” discussion only where it is practicable, evidence-based, and it materially contributes to understanding mitigation, the extent to which likely adverse federal effects are significant, and follow-up requirements.	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
2(VI)	N/A	N/A	VI. OPG supports IAAC’s determination that the information provided in the Initial Project Description is sufficient to address “alternatives to” the project. As indicated in Section 2.2.1 of the Initial	No update.	The MS-WTFN did not identify specific comments on this item. In subsequent engagement with the MS-WTFNs, “alternatives to” assessment for the NNW

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG’s Proposed Updates to Draft TISG Text
			Project Description and Annex A of the Response to Summary of Issues, NNW Project is in recognition of Ontario’s Integrated Energy Plan Energy for Generations which calls for up to 12 large new nuclear units to be in service by 2050, with up to approximately 10,000MW of new large nuclear potential at the Wesleyville site. To generate the same amount of energy as 10,000MW of nuclear at Wesleyville, the province would need to set aside approximately 100 times more land for solar and 500 times more land for wind, highlighting the energy density and land efficiency of nuclear power (Ministry of Energy and Mines, 2025). OPG has been directed to develop and operate such nuclear units; OPG has not been directed to decide on the energy mix that OPG would like to develop.		Project was raised as a concern. See OPG’s response below: On January 15, 2025, the Ontario government asked OPG to explore opportunities for new nuclear energy generation at the Wesleyville site. This information is provided in the Initial Project Description ² . In the Response to Summary of Issues ³ , OPG also describes how the NNW Project is in direct response to Ontario’s electricity needs, under Energy for Generations, clean, affordable and reliable nuclear power will continue to serve as the backbone of the province’s electricity system.
2(VII)	N/A	N/A	VII. OPG has identified that references to REGDOC-1.1.1 in the TISG currently link to either Version 1 or Version 1.2. OPG requests that references to REGDOCs, codes, and standards in the TISG (including CSA standards) link to versions whose freeze dates will be formally agreed upon by the CNSC and OPG.	No update.	The MS-WTFN did not identify specific comments on this item.
Comments on the Generic Requirements for Impact Statements					
1	Generic requirements for Impact Statements Assessment methodology	The proponent is encouraged to take an ecosystem-based approach that considers how the project may affect the structure and functioning of biotic and abiotic factors within the ecosystem using	The proponent is encouraged to take an ecosystem-based approach that considers how the project may affect the structure and functioning of biotic and abiotic factors within the ecosystem using scientific evidence, Indigenous	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A

² OPG New Nuclear at Wesleyville in Port Hope, Initial Project Description (CIAR#1) Available at: <https://iaac-aeic.gc.ca/050/documents/p89802/162725E.pdf>
³ OPG New Nuclear at Wesleyville in Port Hope, Response to Summary of Issues (CIAR#759) Available at: <https://iaac-aeic.gc.ca/050/documents/p89802/165692E.pdf>

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		scientific evidence, Indigenous Knowledge and community knowledge.	Knowledge and community knowledge, where provided for this use.		
2	Generic requirements for Impact Statements Assessment methodology – spatial and temporal boundaries	The Impact Statement must: - Describe the spatial boundarie(s) for each VC and provide a rationale for each boundary, considering: - scale and spatial extent of effects from the project, - the physical location of potential receptors, including any relevant movement pattern, - interactions between VCs, - Indigenous Knowledge and community knowledge, - current or traditional land and resource use by Indigenous groups, - Indigenous Peoples and their rights, including treaty lands, traditional territories and areas or sites used for cultural and spiritual practices, - scientific evidence, - geographic extent of effects of past, existing and reasonably foreseeable projects and physical activities, and - information received from Indigenous groups; - show the spatial boundaries on maps to clearly illustrate the predicted geographic extent of changes to the environment as visual tools to support engagement and consultation with the public and Indigenous groups (i.e. zone of influence maps with defined boundaries); and - identify where spatial boundaries may extend to areas that are (i) on federal	The Impact Statement must: - describe the spatial boundarie(s) for each VC and provide a rationale for each boundary, considering: - scale and spatial extent of effects from the project, - the physical location of potential receptors, including any relevant movement pattern, - interactions between VCs, - Indigenous Knowledge and community knowledge where provided for this use, - current or traditional land and resource use by Indigenous groups where provided for this use, - Indigenous Peoples and their rights, including treaty lands, traditional territories and areas or sites used for cultural and spiritual practices, where provided for this use, - scientific evidence, - geographic extent of effects of past, existing and reasonably foreseeable projects and physical activities, and - information received from Indigenous groups; - show the spatial boundaries on maps to clearly illustrate the predicted geographic extent of changes to the environment as visual tools to support engagement and consultation with the public and Indigenous groups (i.e. zone of	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		lands, (ii) in a province other than the one where the project is being carried out, or (iii) outside Canada.	influence maps with defined boundaries); and - identify where spatial boundaries may extend to areas that are (i) on federal lands, (ii) in a province other than the one where the project is being carried out, or (iii) outside Canada.		
3	Generic requirements for Impact Statements Assessment methodology – spatial and temporal boundaries	Describe the temporal boundarie(s) for each VC and provide a rationale for each boundary, considering: - schedule of phases of the project, - past conditions and historical context, - Indigenous Knowledge and community knowledge, - impacts on Indigenous Peoples and their rights, including current or traditional land and resource use, treaty lands, traditional territories and areas or sites used for cultural and spiritual practices, - relevant physical, technical, ecological, social, health, economic and cultural considerations from an ecosystem approach, - timing of past, existing and reasonably foreseeable projects and activities and their effects, - that boundaries will generally be larger for cumulative effects, and - - information received from Indigenous groups.	Describe the temporal boundarie(s) for each VC and provide a rationale for each boundary, considering where relevant: -schedule of phases of the project, -past conditions and historical context, -Indigenous Knowledge and community knowledge where provided for this use, -impacts on Indigenous Peoples and their rights, including current or traditional land and resource use, treaty lands, traditional territories and areas or sites used for cultural and spiritual practices where provided for this use, -relevant physical, technical, ecological, social, health, economic and cultural considerations from an ecosystem approach, -timing of past, existing and reasonably foreseeable projects and activities and their effects. -that boundaries will generally be larger for cumulative effects, and -information received from Indigenous groups where provided for this use.	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
4	Generic requirements for Impact Statements Assessment methodology – baseline conditions	Baseline conditions are the existing conditions prior to the project, including how historical, past or existing projects and activities have already affected the conditions, and must be established in a manner and at a level of detail relevant to predict the effects of the project on each VC.	Baseline conditions are the existing conditions prior to the project, including how historical, past or existing projects and activities have already affected the existing conditions, and must be established in a manner and at a level of detail relevant to predict the effects of the project on each VC.	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
5	Generic requirements for Impact Statements Assessment methodology – baseline conditions	Describe changes in the baseline conditions that are likely to occur in the future, if the project were not carried out, including future changes due to climate change;	Where it materially contributes in the effects assessment to understanding mitigation measures, the extent to which likely adverse federal effects are significant and follow-up requirements, describe changes in the baseline conditions that are likely to occur in the future, if the project were not carried out, including future changes due to climate change;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
6	Generic requirements for Impact Statements Assessment methodology – baseline conditions	Show that the data sources used are representative of conditions within the established spatial and temporal boundaries and account for natural variability, especially if surrogate data from representative sites are used rather than specific measurements at the project site;	Show that the Describe how data sources used are representative of conditions within the established spatial and temporal boundaries and how the Impact Assessment process will account for natural variability, especially if surrogate data from representative sites are used rather than specific measurements at the project site;	OPG is proposing revision to its original recommendation related to the yellow highlighted text, based on MS-WTFNs position and subsequent engagement: Show that the Explain and provide evidence of how data sources used are representative of conditions within the established spatial and temporal boundaries and accounts for natural variability, especially if surrogate data from representative sites are used rather than specific measurements at the project site;	"Show that the data sources used are representative of conditions" may be interpreted to include a comparative analysis against other sources of data. An alternative phrasing is proposed to reflect OPG's understanding of the intent of this requirement.
7	Generic requirements for Impact Statements Assessment methodology – effects assessment	The assessment of effects must be based on a comparison of baseline conditions with and, where baseline conditions are anticipated to change over time, without the project.	The assessment of effects must be based on a comparison of baseline conditions with and, where baseline conditions are anticipated to change over time and it materially contributes to understanding mitigation measures, the extent to which likely adverse federal effects are significant, and follow-up requirements, without the project.	No update.	The MS-WTFN did not identify specific comments on this item.
8	Generic requirements for Impact Statements Assessment methodology – effects assessment	Describe the analytical methods to assess effects, including clearly stated assumptions for predictions and how each assumption has been tested;	Describe the analytical methods to assess effects, including clearly stated assumptions for predictions; and how each assumption has been tested;	OPG is proposing revision to its original recommendation related to the yellow highlighted text, based on MS-WTFNs position: Describe the analytical methods to assess effects, including clearly stated assumptions	How assumptions are tested will include both efforts to validate data at the IS stage as well as on-going data collection. An adjustment to the proposed tailoring is recommended to better align with that intent.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
				for predictions and how each assumption is has been tested;	
9	Generic requirements for Impact Statements Assessment methodology – effects assessment	For the effect assessment of each VC, the Impact Statement must: describe the perspectives, concerns and tolerance levels of Indigenous groups and other participants;	For the effect assessment of each VC, the Impact Statement must: describe the perspectives and concerns and tolerance levels of Indigenous groups and other participants where provided for this use;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
10	Generic requirements for Impact Statements Assessment methodology – effects assessment	For quantitative predictions based on models, describe model assumptions, parameters, margins of errors, as well as model calibration, validation and model performance metrics used;	For quantitative predictions based on models, describe model assumptions, parameters, margins of errors, as well as model calibration, validation and model performance metrics used; or future processes to validate quantitative predictions	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	Follow-up programs are an integral element of the Impact Assessment process wherein a proponent verifies the accuracy of an IA and the effectiveness of mitigation measures, and takes corrective actions, as required. OPG's effects assessment, including models, will be based on conservative assumptions and will incorporate views shared by the MS-WTFNs, government reviewers, and key stakeholders. OPG intends to leverage future processes, such as the follow-up program, to validate those assumptions. As outlined in Section 1.4 of the draft Integrated Guidelines, "Where the proponent considers that certain information or studies may be generated progressively over time, they should clearly demonstrate how the information available at the integrated assessment stage is sufficient to support sound conclusions and decision-making. This includes explaining how any remaining uncertainties will be understood and managed, and how subsequent information would be incorporated in a manner that maintains the integrity and objectives of the assessment." For quantitative models supporting this assessment (groundwater flow models, lake models) additional monitoring for existing site-specific seasonal data to use in validation of the model outcomes may continue beyond initial modelling scenarios. The recommended tailoring of clauses is intended to recognize this.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
11	Generic requirements for Impact Statements Assessment methodology – mitigation measures	Describe how the mitigation measures may also address adverse impacts on Indigenous rights and, if necessary, describe any additional measures to address adverse impacts on Indigenous rights;	Describe how the mitigation measures may also address adverse impacts on Indigenous rights and, if necessary, describe any additional measures to address adverse impacts on Indigenous rights based on shared discussions with or other information provided for this use by First Nations and Indigenous communities;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
12	Generic requirements for Impact Statements Assessment methodology – mitigation measures	Document collaboration with, and perspectives from, Indigenous groups on mitigation measures, as well as any additional measures to address impacts on Indigenous rights and any enhancements of benefits for Indigenous Peoples, including: - how the proponent has addressed the suggestions and recommendations from impacted Indigenous groups, - how Indigenous Knowledge was considered, and - how the timing of Indigenous activities on the land was considered (e.g. schedule of project activities);	Document collaboration with, and perspectives from, Indigenous groups on mitigation measures, as well as any additional measures to address impacts on Indigenous rights and any enhancements of benefits for Indigenous Peoples, where provided for such use. including: - how the proponent has addressed the suggestions and recommendations from impacted Indigenous groups, - how Indigenous Knowledge was considered, and - how the timing of Indigenous activities on the land was considered (e.g. schedule of project activities);	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
13	Generic requirements for Impact Statements Assessment methodology – mitigation measures	Provide a table listing all mitigation measures essential to ensure the project will not result in significant adverse federal effects, or to reduce their extent of significance (to low or moderate significance), and any additional measures to address impacts on Indigenous rights and, for each measure:	Provide a table listing all mitigation measures that when implemented, essential to ensure the project will not result in significant adverse federal effects, or to reduce their extent of significance (to low or moderate significance), and any additional measures to address impacts on Indigenous rights and, for each measure: residual significant adverse federal effects, or to reduce their extent of significance (to low or moderate significance), and any additional measures to address impacts on Indigenous rights and, for each measure:	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
14	Generic requirements for Impact Statements Assessment methodology – mitigation measures	Provide available evidence of the effectiveness of the measure, including quantifying to what extent it would eliminate, reduce, control or offset significant adverse federal effect(s). The proponent is also encouraged to share the evidence available with Indigenous groups. Uncertainty on effectiveness must be considered in the follow-up program and effects, should the measures not be effective or malfunction, must be incorporated into the residual effects assessment,	Provide available evidence of the effectiveness of any new or innovative measures the measure, including quantifying to what extent it would eliminate, reduce, control or offset significant adverse federal effect(s). The proponent is also encouraged to share the evidence available with Indigenous groups. Uncertainty on effectiveness must be considered in the follow-up program and effects, should the measures not be effective or malfunction, must be incorporated into the residual effects assessment,	No update.	The MS-WTFN did not identify specific comments on this item.
15	Generic requirements for Impact Statements Assessment methodology – cumulative effects assessment	The Impact Statement must assess the project's likely cumulative adverse federal effects as well as impacts on Indigenous Peoples and their rights. The proponent is encouraged to make use of the Government of Canada Open Science and Data Platform, Open Government Portal and Government of Canada Publications as tools to access science, data, publications and information about development activities to better understand cumulative effects.	The Impact Statement must assess the project's likely cumulative adverse federal effects as well as impacts on Indigenous Peoples and their exercise of rights . The proponent is encouraged to make use of the Government of Canada Open Science and Data Platform, Open Government Portal and Government of Canada Publications as tools to access science, data, publications and information about development activities to better understand cumulative effects.	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
16	Generic requirements for Impact Statements Assessment methodology – cumulative effects assessment	For adverse federal effects on VCs and impacts on Indigenous Peoples and their rights, the Impact Statement must:	For adverse federal effects on VCs and impacts on Indigenous Peoples and their exercise of rights, the Impact Statement must:	No update.	The MS-WTFN did not identify specific comments on this item.
17	Generic requirements for Impact Statements	A comparison of possible future scenarios the project, reflecting the total	A qualitative and/or quantitative (where appropriate and feasible) comparison of possible future	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
	Assessment methodology – cumulative effects assessment	cumulative effects and not just the project's contribution, and	conditions /scenarios, reflecting the total cumulative effects and not just the project's contribution, and		
18	Generic requirements for Impact Statements Assessment methodology – cumulative effects assessment	Provide a rationale for any excluded VC;	Provide a rationale for any excluded VC;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
19	Generic requirements for Impact Statements Assessment methodology – cumulative effects assessment	Where measures to mitigate cumulative effects are beyond the control of the proponent, identify any parties that have authority to mitigate the effects and summarize any commitments or complementary measures by the other parties regarding their implementation and any associated communication plan;	Where measures to mitigate cumulative effects are beyond the control of the proponent, identify any parties that have authority to mitigate the effects and summarize any commitments or complementary measures by the other parties regarding their implementation and any associated communication plan where publicly available;	No update.	The MS-WTFN did not identify specific comments on this item.
20	Generic requirements for Impact Statements Assessment methodology – cumulative effects assessment	Consider the ability of Indigenous Peoples to exercise their rights and culture, including where the project's incremental impacts are minor, as well as the views and preferences of each Indigenous group in carrying out and presenting the assessment. Where provided with information and in collaboration with Indigenous groups, the proponent must document the lived and told experience of the effects in relation to the ability of Indigenous Peoples to exercise their rights and culture through time; and	Consider the ability of Indigenous Peoples to exercise their rights and culture, including where the project's incremental impacts are minor, as well as the views and preferences of each Indigenous group in carrying out and presenting the assessment. Where provided with information and in collaboration with Indigenous groups, the proponent must document the lived and told experience of the effects in relation to the ability of Indigenous Peoples to exercise their rights and culture through time; and Information would be included where Indigenous groups have shared it and are aligned with the uses indicated by	OPG is proposing revision to its original recommendation related to the yellow highlighted text, based on MS-WTFNs position: Consider the ability of Indigenous Peoples to exercise their rights and culture. including where the project's incremental impacts are minor, as well as the views and preferences of each Indigenous group in carrying out and presenting the assessment. Where provided with information and in collaboration with Indigenous groups, the proponent must document the lived and told experience of the effects in relation to the ability of Indigenous Peoples to exercise their rights and culture through time; and Information would be included where First Nations or	OPG is proposing revision to its original recommendation related to the yellow highlighted text, based on MS-WTFNs. Removed "Indigenous Groups" as suggested replacing with "First Nation(s) and/or Indigenous Community(s)"

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
			each Indigenous group for sharing information or input.	Indigenous Communities have shared it and are aligned with the uses indicated by each First Nation and Indigenous Community for sharing information or input.	
21	Generic requirements for Impact Statements Assessment methodology – Extent to which likely adverse federal effects are significant	Indicate whether the effect is likely to be, to some extent, significant and, if so, the extent of significance (i.e. low, moderate or high significance) by characterizing the extent of significance on a scale of not significant; low, moderate or high significance;	Indicate whether the effect is likely to be, to some extent, significant and, if so, the extent of significance (i.e. low, moderate or high significance) by characterizing the extent of significance on a scale of not significant; low, moderate or high significance;	OPG is proposing revision to its original recommendation related to the yellow highlighted text, based on engagement with the MS-WTFNs: Indicate whether the effect is likely to be, to some extent, significant and, if so, the extent of significance by characterization on a spectrum or graded scale;	The MS-WTFN did not identify specific comments on this item. However, in subsequent engagement, MS-WTFNs raised concern about how significance will be measured. OPG is proposing revision to its original recommendation related to the yellow highlighted text to provide clarity on how OPG intends to describe the extent of significance.
22	Generic requirements for Impact Statements Assessment methodology – Extent to which likely adverse federal effects are significant	Provide a rationale for the methodology and choice of quantitative or qualitative criteria used to determine the extent to which the effect is significant. Criteria and relevant benchmarks should be defined and applied with Indigenous groups; and	Provide a rationale for the methodology and choice of quantitative or qualitative criteria used to determine the extent to which the effect is significant, including any input shared by Indigenous groups where it is provided for this use or through engagement with stakeholders. Criteria and relevant benchmarks should be defined and applied with Indigenous groups; and	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
23	Generic requirements for Impact Statements Assessment methodology – Extent to which likely adverse federal effects are significant	Identify and explain relevant sources of information that were used to characterize the extent to which the effect is significant, including the sensitivity and importance of affected VCs, the existence of standards or guidelines, disproportionate effects for diverse population groups as per the GBA Plus, and how the perspectives, concerns and tolerance levels of Indigenous groups and participants were considered.	Identify and explain relevant sources of information that were used to characterize the extent to which the effect is significant, including where relevant the sensitivity and importance of affected VCs, the existence of standards or guidelines, disproportionate effects for diverse population groups as per the GBA Plus, and how the perspectives and concerns and tolerance levels of Indigenous groups and participants were considered, where provided for this use.	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG’s Proposed Updates to Draft TISG Text
24	Generic requirements for Impact Statements General Information	Include all information in a machine-readable, accessible format. Where information is provided as a map in the Impact Statement, the proponent must provide corresponding electronic geospatial data file(s). IAAC will make the geospatial data files available to the public under the terms of the Open Government Licence – Canada. Geospatial data files must follow IAAC’s Guidance on submitting geospatial data. In addition, the proponent should be prepared to provide data, including surveys, analyses, methods, modelling, and results in well-documented data files, including geoenabled format where available, at the request of IAAC [or the review panel] to support the impact assessment.	In addition, the proponent should be prepared to provide data, including surveys, analyses, methods, modelling, and results in well-documented data files, including geoenabled format where available, at the request of IAAC [or the review panel] to support the impact assessment.	No update.	The MS-WTFN did not identify specific comments on this item.
25	Generic requirements for Impact Statements Description of potential malfunctions or accidents that may occur in connection to the project	Major effects could be caused by the failure of certain works resulting from malfunctions (i.e. works do not operate as intended) or from accidents (i.e. human error), including in cases where events resulting from effects of the environment on the project are a contributing or complicating factor (e.g. flooding, earthquake, forest fire). Malfunctions or accidents that may occur in connection with the project must be described (even if unlikely to occur) and, where relevant, their effects on each VC must be assessed. For projects that include marine shipping or navigation, the proponent is encouraged to undertake a Navigation Safety Assessment Program (NSAP) review collaboratively with Transport Canada’s Marine Safety and Security Directorate, and include it in the Impact Statement.	Major effects could be caused by the failure of certain works resulting from malfunctions (i.e. works do not operate as intended) or from accidents (i.e. human error), including in cases where events resulting from effects of the environment on the project are a contributing or complicating factor (e.g. flooding, earthquake, forest fire). Malfunctions or accidents that may occur in connection with the project must be described (even if unlikely to occur) and, where relevant, their effects on each VC must be assessed. For projects that include Where marine shipping or navigation may be needed , the proponent is encouraged to undertake state the potential need for and timing of a Navigation Safety Assessment Program (NSAP) review collaboratively with Transport Canada’s Marine Safety and Security Directorate and, where	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG’s Proposed Updates to Draft TISG Text
			appropriate , include it in the Impact Statement.		
26	Generic requirements for Impact Statements Impact Statement Summary	As part of the submission of its Impact Statement, the proponent must prepare and submit a stand-alone plain language summary of the Impact Statement in both English and French. The summary must contain sufficient details for the reader to understand the project and its adverse federal effects and impacts on Indigenous Peoples and their rights. The summary provides an opportunity for the proponent to demonstrate through a plain-language narrative how it addressed issues raised, notably by Indigenous groups and the public. The summary must include maps illustrating the project location, key project components, and zone of influence of the project on its environment. The proponent is also encouraged to include visual tools to illustrate the predicted geographic extent of changes to the environment (e.g. zone of influence maps with defined boundaries) as well as relevant tables including of mitigation measures and the follow-up program.	As part of the submission of its Impact Statement, the proponent must prepare and submit a stand-alone plain language summary of the Impact Statement in both English and French. The summary must contain sufficient details for the reader to understand the project and its adverse federal effects and impacts on Indigenous Peoples and their rights. The summary provides an opportunity for the proponent to demonstrate through a plain-language narrative how it addressed issues raised, notably by Indigenous groups and the public. The summary must include maps illustrating the project location and key project components, and zone of influence of the project on its environment. The proponent is also encouraged to include visual tools to illustrate the predicted geographic extent of changes to the environment (e.g. zone of influence maps with defined boundaries) as well as relevant tables including of mitigation measures and the follow-up program.	No update.	The MS-WTFN did not identify specific comments on this item.
27	Generic requirements for Impact Statements Impact Statement Summary	Impacts on Indigenous Peoples and their rights, and the mitigation measures or any additional measures to address them;	Impacts on Indigenous Peoples and their rights, and the mitigation measures or any additional assessment or measures to define and address them, informed by information where it is provided for this use;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
28	1.2.1 – Site evaluation	The site evaluation and IA determine, for the entire lifecycle of the project, whether: siting option choices were made to avoid or minimize environmental effects;	The site evaluation and IA determine provides adequate and sufficient information on the environmental effects of the project so that it can be determined , for the entire lifecycle of the project, whether: siting option choices were made to avoid or reduce environmental effects;	No update.	The MS-WTFN did not identify specific comments on this item.
29	1.2.1 – Site evaluation	The site evaluation process should satisfy the criteria contained in the following documents that apply to the facility being considered, including applicable federal environmental legislation and resources [3], [7], [8], and [9] in the Compendium. In accordance with the Canadian Standards Association (CSA) N288.6 [8], the site evaluation is periodically re-evaluated. The re-evaluation focuses on confirmation of the site characteristics and assessing the effects of the updated information. Design modifications, updates to operations, or both may be needed.	The site evaluation process should satisfy the criteria contained in the following documents that apply to the facility being considered, including applicable federal environmental legislation and resources [3], [7], [8] , and [9] in the Compendium. In accordance with the Canadian Standards Association (CSA) N288.6 [8] . As indicated in the Preface of [3] , the site evaluation is periodically re-evaluated. The re-evaluation focuses on confirmation of the site characteristics and assessing the effects of the updated information. Design modifications, updates to operations, or both may be needed.	No update.	The MS-WTFN did not identify specific comments on this item.
30	1.2.2 – Site Preparation	The proponent is applying for a LTPS for a Class IA nuclear facility under the NSCA. The proponent is required to hold an LTPS before any work is done on the site.	The proponent is applying for an LTPS for a Class IA nuclear facility and Class IB nuclear waste facility under the NSCA. The proponent is required to hold an LTPS before any licensed site preparation activities are work is done on the site.	No update.	The MS-WTFN did not identify specific comments on this item.
31	1.3 – Selection of Valued Components	Valued Components (VCs) serve as the focal points for the impact assessment. The elements of the natural and human environments selected as VCs are those anticipated to be material for decision making under the IAA. The assessment of effects on VCs includes the assessment of the likely effect pathways that are cause-effect linkages between a project	Valued Components (VCs) serve as the focal points for the impact assessment. The elements of the natural and human environments selected as VCs are those anticipated to be material for decision making under the IAA. The assessment of effects on VCs includes the assessment of the likely effect pathways that are cause-effect linkages between a project	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		component or activity and the VC. The VCs must be assessed following the requirements presented in these Integrated Guidelines, as well as the generic assessment methodology in the Generic Requirements for Impact Statements which outlines the steps that must be applied to the assessment of each VC.	component or activity and the VC. The VCs must be assessed following the requirements presented in these Integrated Guidelines, as well as the generic assessment methodology in the Generic Requirements for Impact Statements which outlines the steps that must be applied to the assessment of each VC.		
32	1.3 –Selection of Valued Components (Table)	Meteorological environment	Meteorological environment	No update.	The MS-WTFN did not identify specific comments on this item.
33	1.3 –Selection of Valued Components (Table)	Geology and geochemistry, including shorelines, peninsulas, and islands	Geology and geochemistry-including shorelines peninsulas, and islands	No update.	The MS-WTFN did not identify specific comments on this item.
34	1.3 –Selection of Valued Components (Table)	Community wellbeing	Community wellbeing Social and economic conditions	OPG is recommending updated wording (this also applies to comments 35-38): Social and economic conditions and community wellbeing which includes services and infrastructure, employment & economics, job creation & procurement opportunities, education & training	OPG is proposing revision to its original recommendation related to the yellow highlighted text, based on MS-WTFNs position. OPG's suggested revision was to organize the VC's (services and infrastructure, employment and economics, job creation and procurement opportunities, and education and training) under the broader category of Social and economic conditions to allow flexibility regarding the identification and structuring of VCs for the purposes of analysis. Baseline conditions for these VCs and others will be described and assessed in terms of effects of the Project. OPG has not suggested that these VCs not be addressed, and was proposing to clarify this by revising the nomenclature of "Social and economic conditions" (including community wellbeing services and infrastructure, employment and economics, job creation and procurement opportunities, and education and training). A further edit was made following discussion with the MS-WTFNs on June 4, 2026, to better

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
					align by revising to "Social and economic conditions and community wellbeing which includes services and infrastructure, employment & economics, job creation & procurement opportunities, Education & training". This also applies to comments 35 to 38.
35	1.3 – Selection of Valued Components (Table)	Services and infrastructure	Services and infrastructure	See comment #34. Social and economic conditions and community wellbeing	Please see Comment #34 for the suggested change to address MS-WTFNs comments related to this.
36	1.3 –Selection of Valued Components (Table)	Employment and economics	Employment and economics	See comment #34. Social and economic conditions and community wellbeing	Please see Comment #34 for the suggested change to address MS-WTFNs comments related to this.
37	1.3 –Selection of Valued Components (Table)	Job creation and procurement opportunities	Job creation and procurement opportunities	OPG is recommending updated wording: Social and economic conditions and community wellbeing	Please see Comment #34 for the suggested change to address MS-WTFNs comments related to this.
38	1.3 –Selection of Valued Components (Table)	Education and training	Education and training	OPG is recommending updated wording: Social and economic conditions and community wellbeing	Please see Comment #34 for the suggested change to address MS-WTFNs comments related to this.
39	1.3 –Selection of Valued Components (Table)	Indigenous Peoples Current use of lands, waters and Relatives for traditional purposes by Indigenous Peoples	Indigenous Peoples Current use of lands, waters and Species as well as other aspects that are identified in footnote X and Relatives for traditional purposes by Indigenous Peoples	<i>Relatives</i> to be replaced with <i>Species as well as other aspects that are identified in footnote X.</i> Footnote X: Species as well as other aspects that are identified in XX (footnote number) including; human and non-human Beings, such as the Land, Air, Waters, and all Animal, Plant, Bird, Fish, and Little Spirit Beings (Relatives). It acknowledges worldviews that hold that all beings are Related and encompasses cultural and spiritual relationships with place.	See OPG response to comment number 2(III).
40	1.3 –Selection of Valued Components	The proponent may select additional VCs, based on engagement with First Nations and other Indigenous communities and public participants and in consideration of	The proponent may select additional VCs will confirm the VCs included in the Integrated Guidelines based on engagement with First Nations and other	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG’s Proposed Updates to Draft TISG Text
		Indigenous Knowledge and community knowledge. The Impact Statement must provide a justification if a VC suggested by a First Nations or Indigenous community is excluded from the Impact Statement.	Indigenous communities and public participants and in consideration of Indigenous Knowledge and community knowledge. The Impact Statement must provide a justification if a VC suggested by a First Nations or Indigenous community is excluded from the Impact Statement. The proponent will provide rationale for the selected VCs in the Impact Statement and may refine the list presented in the Integrated Guidelines to ensure it appropriately reflects the scope of the assessment.		
41	1.4 –Preparing the Impact Statement	The Impact Statement must address requirements outlined in these Integrated Guidelines as well as in IAAC’s Generic Requirements for Impact Statements, including the requirements on assessment methodology, general information, description of change to the project that may be caused by the environment, description of potential malfunctions and accidents that may occur in connection with the project, description of engagement with First Nations and other Indigenous communities, description of public participation, and Impact Statement Summary. Where the proponent is of the opinion that certain information is not required or cannot be provided, it should contact IAAC and the CNSC prior to submitting the Impact Statement to confirm whether the proponent’s rationale for excluding the information is appropriate. The rationale must also be provided in the Impact Statement. Additionally, if there are Indigenous specific requirements that a First Nation or other Indigenous community does not wish to pursue for the Impact Assessment	The Impact Statement must address requirements outlined in these Integrated Guidelines as well as in IAAC’s Generic Requirements for Impact Statements , including the requirements on assessment methodology, general information, description of change to the project that may be caused by the environment, description of potential malfunctions and accidents that may occur in connection with the project, description of engagement with First Nations and other Indigenous communities, description of public participation, and Impact Statement Summary. Where the proponent is of the opinion that certain information is not required or cannot be provided, it should contact IAAC and the CNSC prior to submitting the Impact Statement to confirm whether the proponent’s rationale for excluding the information is appropriate. The rationale must also be provided in the Impact Statement. Additionally, if there are Indigenous specific requirements that a First Nation or other Indigenous community does not wish to pursue for the Impact	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		process, please provide confirmation from the First Nation or other Indigenous community in their section of the Impact Assessment.	Assessment process, please provide confirmation from the First Nation or other Indigenous community in their section of the Impact Assessment.		
42	1.4 –Preparing the Impact Statement	Where the proponent is of the opinion that certain information is not required or cannot be provided, it should contact IAAC and the CNSC prior to submitting the Impact Statement to confirm whether the proponent's rationale for excluding the information is appropriate. The rationale must also be provided in the Impact Statement. Additionally, if there are Indigenous specific requirements that a First Nation or other Indigenous community does not wish to pursue for the Impact Assessment process, please provide confirmation from the First Nation or other Indigenous community in their section of the Impact Assessment.	Where the proponent is of the opinion that certain information is not required or cannot be provided, it should contact IAAC and the CNSC prior to submitting the Impact Statement to confirm whether the proponent's rationale for excluding the information is appropriate. The rationale must also be provided in the Impact Statement. Additionally, if there are Indigenous specific requirements that a First Nation or other Indigenous community does not wish to pursue for the Impact Assessment process, please provide confirmation from the First Nation or other Indigenous community in their section of the Impact Assessment, as available to the proponent for such purposes.	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
43	1.4 –Preparing the Impact Statement	The proponent is also encouraged to submit draft documents for review by IAAC and the CNSC (e.g. proposed study plans, draft sections of the Impact Statement) prior to submitting the formal Impact Statement. The proponent is expected to provide IAAC and the CNSC a work plan for the Impact Statement phase of the integrated assessment, within 3 months of the Notice of Commencement.	The proponent is also encouraged to submit draft documents for review by IAAC and CNSC (e.g. proposed study plans, draft sections of the Impact Statement) prior to submitting the formal Impact Statement. The proponent is expected to provide IAAC and the CNSC a work plan for the planned schedule including IAAC and CNSC review during the Impact Statement phase of the integrated assessment, within 3 months of the Notice of Commencement.	No update.	The MS-WTFN did not identify specific comments on this item.
44	1.4 –Preparing the Impact Statement	As relevant, the proponent is also encouraged to refer to the policy frameworks and guidance available in IAAC's Practitioner's Guide to Federal Impact Assessments including the Technical Considerations and References for the preparation of an Impact	As relevant, the proponent is also encouraged to refer to the policy frameworks and guidance available in IAAC's Practitioner's Guide to Federal Impact Assessments including the Technical Considerations and References for the preparation of an Impact	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		Statement [10], and to keep apprised of updates.	Statement [10], and to keep apprised of updates. The proponent has the option to leverage the Impact Statement to meet provincial requirements under relevant provincial Acts, such as the Ontario Heritage Act.		
45	1.5 – Federal permitting coordination	Under the IAA, federal authorities are prohibited from issuing permits before an impact assessment is completed.	Under the IAA, federal authorities are generally prohibited from issuing permits in relation to carrying out of the Project before an impact assessment is completed	No update.	The MS-WTFN did not identify specific comments on this item.
46	2.2 –Qualifications of individuals preparing the Impact Statement	IAAC and CNSC expect the proponent to demonstrate scientific integrity in their preparation and delivery of the Impact Statement by: - eliminating, controlling for, or appropriately managing potential biases; and - characterizing potential sources and types of scientific uncertainty, including their magnitude and any differences in the interpretation of scientific results.	IAAC and CNSC expect the proponent to demonstrate scientific integrity in their preparation and delivery of the Impact Statement by: - eliminating, controlling for, or appropriately managing potential biases; and - qualitatively or quantitatively, as appropriate, characterizing potential sources and types of scientific uncertainty, including their magnitude and any differences in the interpretation of scientific result	No update.	The MS-WTFN did not identify specific comments on this item.
47	2.5 – Project Overview	Describe the project, key project components and ancillary activities (both nuclear and non-nuclear), scheduling details, the timing of each phase of the project ⁴ , the total lifespan of the project and other key features. If the project is part of a larger sequence of projects, the Impact Statement must outline the larger context;	Describe the project, key project components and ancillary activities (both nuclear and non-nuclear), a general schedule scheduling details , the timing of each phase of the project, the total lifespan of the project and other key features. If the project is part of a larger sequence of projects, the Impact Statement must outline the larger context;	No update.	The MS-WTFN did not identify specific comments on this item.
48	2.6 – Management system for site evaluation	The process of establishing site evaluation-related management system parameters should involve technical and engineering analyses, along with judgments that require extensive	The process of establishing site evaluation-related management system parameters should involve technical and engineering analyses, along with judgments that require extensive	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG’s Proposed Updates to Draft TISG Text
		experience and knowledge. Evaluations should be reviewed and verified by individuals or groups that are independent of those who did the work.	experience and knowledge. In many cases, the parameters and analyses may not lend themselves to direct verification by inspections, tests, or other techniques that can be precisely defined and controlled. In these cases, evaluations should be reviewed and verified by individuals or groups that are independent of those who did the work.		
49	2.5.1 – Decommissioning and Post-Closure Management	The Impact Statement must describe a preliminary decommissioning strategy consistent with applicable CNSC regulatory requirements (REGDOC-2.11.2) [17], including anticipated approaches to decontamination, dismantling, waste management, and site end-state objectives. The Impact Statement must describe anticipated used nuclear fuel quantities, storage methods, duration of on-site storage, and reasonably foreseeable long-term management pathways (e.g., transfer to an authorized disposal facility or continued monitored storage), sufficient to support the assessment of potential adverse federal effects across the full project lifecycle. The Impact Statement must assess potential long-term and post-closure effects on relevant valued components, including groundwater, surface water, the biological environment, and Indigenous Rights, and describe proposed monitoring, follow-up, and financial assurance mechanisms applicable to decommissioning and post-closure phases.	The Impact Statement must describe how the project will be decommissioned a preliminary decommissioning strategy consistent with applicable CNSC regulatory requirements (REGDOC-2.11.2), including anticipated approaches to decontamination, dismantling, waste management, and site end-state objectives. The Impact Statement must demonstrate that the site evaluation process has appropriately considered future decommissioning in the planning for the nuclear facility and has adequately considered end-of-life decommissioning. For activities encompassed by the Licence To Prepare Site, the Impact Statement must include a preliminary decommissioning plan and financial guarantee that cover the scope of work and related costs to return the site from the conditions expected at the end of a Licence To Prepare Site to an agreed-upon end state. The Impact Statement must describe anticipated used nuclear fuel quantities, storage methods, duration of on-site storage, and reasonably foreseeable long-term management pathways (e.g., transfer to an authorized disposal facility or continued monitored storage), sufficient to support the assessment of potential adverse federal effects across	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
			the full project lifecycle. The Impact Statement must assess potential long-term and post-closure effects on relevant valued components, including groundwater, surface water, the biological environment, and Indigenous Rights, and describe proposed monitoring, follow-up, and financial assurance mechanisms applicable to decommissioning and post-closure phases.		
50	2.6 – Project components and activities	Describe project components and activities to be carried out during each project phase, with a focus on components and activities with the greatest potential for adverse federal effects and impacts on First Nations and other Indigenous communities and their rights including management options for used nuclear fuel:	Describe project components and activities to be carried out during each project phase, with a focus on components and activities with the greatest potential for adverse federal effects and impacts on First Nations and other Indigenous communities and their exercise of rights including management options for used nuclear fuel:	No update.	The MS-WTFN did not identify specific comments on this item.
51	2.6.1 – Plant parameter envelope approach	The PPE is a listing of values that supports (or informs) the bounding envelope that can be used in the Impact Statement to assist in predicting the potential safety and environmental effects of a nuclear reactor facility at a particular site.	The PPE is a listing of bounding values that supports (or informs) the bounding envelope that can be used in the Impact Statement to assist in predicting the potential safety and environmental effects of a nuclear reactor facility at a particular site. The listing of PPE values shall provide the required technology input to the pathways and effects assessment conducted in the Impact Assessment.	No update.	The MS-WTFN did not identify specific comments on this item.
52	2.6.1 – Plant parameter envelope approach	The PPE must be informed from the outset by engagement with First Nations and other Indigenous communities, including Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations which includes Alderville First Nation, Curve Lake First Nation, Hiawatha First Nation, Mississaugas of Scugog	Where project activities may affect Indigenous Rights, lands, waters, or species the proponent will describe in the Impact Statement how Indigenous perspectives and Indigenous Knowledge informed the identification and mapping of pathways. The PPE must will be informed through early from the outset	No update.	See OPG response to comment number 2(III) related to the updated term 'Relatives'.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG’s Proposed Updates to Draft TISG Text
		Island First Nations (MS-WTFN) defined impact pathways, where provided, and to report the results of this engagement in the Impact Statement. Where project activities may affect Indigenous Rights, lands, waters, or Relatives, the proponent must describe in the Impact Statement how Indigenous perspectives and Indigenous Knowledge informed the identification and mapping of PPE effect pathways and the selection of PPE parameters, indicators, and assumptions used to characterize those pathways.	by engagement with First Nations and other Indigenous communities, including Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations which includes Alderville First Nation, Curve Lake First Nation, Hiawatha First Nation, Mississaugas of Scugog Island First Nations (MS-WTFN). defined impact pathways, where provided, and to report the Results of this engagement will be reported in the Impact Statement. Where project activities may affect Indigenous Rights, lands, waters, or Relatives, the proponent must describe in the Impact Statement how Indigenous perspectives and Indigenous Knowledge informed the identification and mapping of PPE effect pathways and the selection of PPE parameters, indicators, and assumptions used to characterize those pathways.		
53	2.6.1 – Plant parameter envelope approach	PPE parameter selection must not be limited to biophysical or technical indicators alone. Where MS-WTFNs identify pathways related to access, harvesting, cultural continuity, stewardship responsibilities, governance responsibilities, or intergenerational wellbeing, the Impact Statement must explain how those pathways were reflected in the PPE framework and parameters, and areas of agreement and disagreement must be documented.	PPE parameter selection must not be limited to biophysical or technical indicators alone. As described in Section 7, where MS- WTFNs identify pathways related to access, harvesting, cultural continuity, stewardship responsibilities, governance responsibilities, or intergenerational wellbeing, the Impact Statement must explain how those pathways were reflected in the Project PPE framework and parameters, and including areas of agreement and disagreement must be documented.	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	OPG's proposed modification of the text was to clarify that pathways identified by the MS-WTFNs need to be reflected in the IS. However, OPG recommends pathways not be included in the Plant Parameter Envelope (PPE) since the intended purpose of that document is a list of parameters that will facilitate the identification and evaluation of the pathways elsewhere in the IS. The PPE provides technical reactor parameters to assist in predicting potential impacts of a nuclear generating station at a particular site. Although an important input into effects assessment, the PPE would not itself identify pathways of effects (such as access, harvesting, cultural continuity). OPG proposes that this important role is performed directly in the Impact Statement (IS) as per draft NNW TISG Section 2.6 Project components and activities and Section 4 Assessment Methodology. As per

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
					Section 2.6.1 of the draft NNW TISG, OPG intend that the IS provide "the derivation, analysis, and justification of the PPE parameters used with adequate level of detail to [...] ensure a transparent and robust assessment of the effects of the project and development of appropriate mitigation measures, including [...] the pathways of effects".
54	2.6.1 – Plant parameter envelope approach	In applying a bounding envelope, the proponent's Impact Statement must provide: • [...] ○ ensure that the bounding parameters encompass all technologies under consideration including all design information that is necessary to support the Impact Statement and the proposed site preparation activities under the LTPS (e.g. plant footprint excavation, and excavation of cooling water intake tunnels);	In applying a bounding envelope, the proponent's Impact Statement must provide: • [...] ○ ensure that the bounding parameters encompass all technologies under consideration including all design information that is used in the calculation of limiting effects in necessary to support the Impact Statement and the proposed site preparation activities under the LTPS (e.g. plant footprint, excavation and embedment depth, excavation of cooling water intake tunnels and circulating cooling water flow rates)	No update.	The MS-WTFN did not identify specific comments on this item.
55	2.6.1 – Plant parameter envelope approach	The pathways of effects for each technology, including a clear description of the differences among them; and	The pathways of effects for each technology the plant parameter envelope , including a clear description of the differences among them each technology considered ; and	No update.	The MS-WTFN did not identify specific comments on this item.
56	2.6.1 – Plant parameter envelope approach	A description of the manner in which reactor technologies could differ in their impact on the environment throughout the project life cycle (i.e., site preparation, construction, operation,	A description of the manner in which reactor technologies could differ in their impact on the environment throughout the project life cycle (i.e., site preparation, construction, operation,	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		decommissioning, and abandonment); and	decommissioning, and abandonment); and		
57	2.6.1 – Plant parameter envelope approach	In applying a bounding envelope, the proponent's Impact Statement must provide: A description of key sources of uncertainty, including long-term, cumulative, and intergenerational uncertainties identified through engagement with First Nations and other Indigenous communities; and A description of clear measures for the management of uncertainty. Where uncertainty relates to potential impacts on Indigenous Rights, health, safety, cultural continuity, or stewardship responsibilities, the proponent must apply conservative assumptions where appropriate and describe adaptive management and follow-up measures designed to reduce uncertainty over time.	In applying a bounding envelope, the proponent's Impact Statement must provide: A description of key sources of uncertainty, including with consideration given to long-term, cumulative, and intergenerational uncertainties identified through engagement with First Nations and other Indigenous communities; and A description of clear measures for the management of uncertainty with consideration given where uncertainty relates to potential impacts on Indigenous Rights, health, safety, cultural continuity, or stewardship responsibilities where provided by First Nations and other Indigenous communities. The proponent must apply conservative assumptions where appropriate and describe adaptive management and follow-up measures designed to reduce uncertainty over time.	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
58	2.6.1 – Plant parameter envelope approach	To facilitate meaningful engagement with First Nations and other Indigenous communities and the public on the use of the bounding approach, a clear understanding of the PPE and its role, the bounding parameters, and the pathways of effects for each technology and potential site location, is required.	To facilitate meaningful engagement with First Nations and other Indigenous communities and the public on the use of the bounding approach, a clear understanding of the PPE and its role, the bounding parameters, and the pathways of effects for each technology and potential site location, is required.	No update.	The MS-WTFN did not identify specific comments on this item.
59	2.8.4 -Alternatives means of carrying out the project	Potential for adverse environmental, health, social and economic effects and impacts on First Nations and other Indigenous communities and their rights,	Potential for adverse environmental, health, social and economic effects and impacts on First Nations and other Indigenous communities and their rights,	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		as identified by First Nations and other Indigenous communities;	as identified by First Nations and other Indigenous communities, where information/data are provided for this use;		
60	2.8.4 –Alternative means of carrying out the project	Describe all reasonable alternatives considered that would avoid impacts on current use of lands, waters and Relatives for traditional purposes considered during project development	Describe all reasonable alternatives considered that would avoid impacts on current use of lands, waters and Relatives species as well as other aspects that are identified in footnote X for traditional purposes considered during project development	<i>Relatives</i> to be replaced with <i>Species as well as other aspects that are identified in footnote X.</i> Footnote X: Species as well as other aspects that are identified in XX (footnote number) including; human and non-human Beings, such as the Land, Air, Waters, and all Animal, Plant, Bird, Fish, and Little Spirit Beings (Relatives). It acknowledges worldviews that hold that all beings are Related and encompasses cultural and spiritual relationships with place.	See OPG response to comment number 2(III) related to the updated term 'Relatives'.
61	2.8.4 - Alternatives means of carrying out the project)	Address key project elements in its alternative means analysis, including, but not limited to, the following: [...] • switchyard design;	Address key project elements in its alternative means analysis, including, but not limited to, the following: [...] • switchyard design; • Design of project area high voltage switching equipment within OPG control;	No update.	The MS-WTFN did not identify specific comments on this item.
62	2.8.4 - Alternatives means of carrying out the project	Address key project elements in its alternative means analysis, including, but not limited to, the following: [...] • route or corridor and means options for linear components (e.g. transmission lines, roads, railways); • Width of the right-of-way;	Address key project elements in its alternative means analysis, including, but not limited to, the following: [...] • Onsite route or corridor and means options for linear components (e.g. transmission lines, roads, railways), including widths of new onsite and site boundary rights-of way where applicable; • Width of the right-of-way;	No update.	The MS-WTFN did not identify specific comments on this item.
63	3 - Description of Engagement with First Nation and	Additionally project-specific requirements have been identified during consultation and engagement activities carried out to date. In addition to the standard	Additionally, project-specific requirements have been identified during consultation and engagement activities carried out to date. In addition to the	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position on bullets 1 to 3, and 5	OPG to adjust language in rationale: Indigenous Community timelines may be extremely different than OPG timelines.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
	Other Indigenous Communities	requirements, the Impact Statement must:	standard requirements, the Impact Statement must should: Bullets 1 to 3 Bullet 4: See comment 65 Bullets 5 to 7	to 7 related to the green highlighted portion of this comment. OPG maintains its tailoring recommendation on bullet 4 (see comment 65). In OPG's view, these comments have considerable implications on the scope of the information requirements as well as the IA schedule.	
64	3 - Description of Engagement with First Nation and Other Indigenous Communities	Describe how the proponent engaged with First Nations and other Indigenous communities early and throughout the impact assessment process to understand potential impacts of the project on Indigenous Peoples and their rights.	Describe how the proponent engaged with First Nations and other Indigenous communities early and throughout the impact assessment process to understand potential impacts of the project on Indigenous Peoples and their rights and to incorporate Indigenous Knowledge, where provided and where permission is granted for its use and disclosure. Engagement must be carried out in good faith in a manner that is attentive to the concerns of First Nations and other Indigenous communities and recognizing the wide diversity of Indigenous Peoples. The project should be designed to avoid and minimize potential adverse impacts and, and to maximize positive impacts on First Nations and other Indigenous communities and their rights on;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
65	3 - Description of Engagement with First Nation and Other Indigenous Communities	Describe the proponent's approach to seek and support First Nations and other Indigenous communities' respective decisions about their free, prior, and informed consent (FPIC) ⁵ for the project and how the proponent intends to continue discussions as the project progresses through the impact assessment process	Describe the proponent's approach to seek and support First Nations and other Indigenous communities' respective decisions about their free, prior, and informed consent (FPIC)⁵ for the project and how the proponent intends to continue discussions as the project progresses through the impact assessment process; The Crown is responsible to consult and where appropriate, accommodate as well as	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	OPG's intent is to support wording that accurately reflects the respective roles of the Crown, federal authorities, and the Proponent, without characterizing or predetermining Crown–Nation matters.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
			aim to secure FPIC where appropriate for Crown decisions.		
66	3 - Description of Engagement with First Nation and Other Indigenous Communities	Clearly outline the proposed waste management plan for the project and demonstrate efforts to engage with First Nations and other Indigenous communities with rights and interests may be affected in relation to potential locations in Canada under consideration for waste management activities in relation to the project.	Clearly outline options considered as part of the proposed waste management plan for the project and demonstrate efforts to engage with First Nations and other Indigenous communities with rights and interests that may be affected in relation to the NNW Project . potential locations in Canada under consideration for waste management activities in relation to the project.	No update.	The MS-WTFN did not identify specific comments on this item.
67	4 - Assessment Methodology	In addition to the standard requirements, the Impact Statement must also:	In addition to the standard requirements, the Impact Statement must should also: Bullets 1 to 5 Bullet 6: where provided, consider pre-colonial baseline conditions for First Nations' and other Indigenous communities' impacts, include community descriptions of current barriers to exercising rights and responsibilities, existing disturbances that constrain access, and areas valued for restoration, reconnection, and care of Relatives, to support cumulative effects and future-scenario analysis; Bullet 7-8 Bullet 9: include criteria and benchmarks for significance determinations, when describing perspectives and tolerance levels of First Nations and other Indigenous communities, co-developed with interested communities, to reflect community thresholds and interpretations of impact severity, duration and consequence, including considerations of cultural continuity,	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment. For the bullets highlighted in yellow (i.e., bullets 6 and 9), OPG maintains its tailoring recommendation that these should be "should" clauses as recommended in OPG's tailoring recommendations to IAAC on the draft TISG submitted on May 7, 2026.	OPG remains committed to respectful collaboration and reconciliation with the MS-WTFNs and encourages Rights-holding First Nations to provide direct input throughout the IA process, recognizing they are best placed to assess the potential impacts of the NNW Project to communities, including cumulative effects. Bullets 6 should be included as "should" statement as fully defining pre-colonial baseline conditions for First Nations is not attainable. Bullet 9: OPG would work with the Rights-holding First Nations and interested Indigenous communities on significance determinations; however, OPG recognizes that there may not always be alignment between western science and Indigenous perspectives.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
			wellbeing and intergenerational effects. Incorporating defined thresholds and interpretations of non-negligible impacts as defined by First Nations and other Indigenous communities, and include explicit documentation of how First Nations and other Indigenous communities input influenced conclusions; Bullets 10-13		
68	4.0 – Assessment Methodology	Assess the projects likely cumulative effects in relation to the ability of Indigenous Peoples to exercise their rights. The proponent should work with First Nations and other Indigenous communities to determine which section within the Impact Statement this assessment is best suited to be included in.	Assess the projects likely cumulative effects in relation to the ability of Indigenous Peoples to exercise their rights. The proponent should work with First Nations and other Indigenous communities to determine which section within the Impact Statement this assessment is best suited to be included in and aligned with the uses indicated by each Indigenous group sharing information or input.	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
69	4.0 – Assessment Methodology	Where provided, consider pre-colonial baseline conditions for First Nations' and other Indigenous communities' impacts, include community descriptions of current barriers to exercising rights and responsibilities, existing disturbances that constrain access, and areas valued for restoration, reconnection, and care of Relatives, to support cumulative effects and future-scenario analysis;	Where provided, and consistent with the permitted uses identified by First Nations and other Indigenous communities sharing information or input (and where appropriate to offer context to potential project effects on a VC), consider pre-colonial baseline conditions for First Nations' and other Indigenous communities' impacts, include community descriptions of current barriers to exercising rights and responsibilities, existing disturbances that constrain access, and areas valued for restoration, reconnection, and care of species as well as other aspects that are identified in footnote X Relatives, to	<u>Relatives</u> to be replaced with <u>Species as well as other aspects that are identified in footnote X.</u> Footnote X: Species as well as other aspects that are identified in XX (footnote number) including; human and non-human Beings, such as the Land, Air, Waters, and all Animal, Plant, Bird, Fish, and Little Spirit Beings (Relatives). It acknowledges worldviews that hold that all beings are Related and encompasses cultural and spiritual relationships with place.	See OPG response to comment number 2(III) related to the updated term 'Relatives'.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
			support cumulative effects and future-scenario project effects analysis;		
70	4.0 – Assessment Methodology	Include First Nation and other Indigenous communities-identified pathways of impact to rights, responsibilities to lands and Relatives, cultural continuity, wellbeing, safety, and sense of place, and use these pathways inform scoping, modelling, and interpretation;	Where provided, and consistent with the permitted uses identified by First Nations and other Indigenous communities sharing information or input, include First Nation and other Indigenous communities-identified pathways of impact to rights, responsibilities to lands and Relatives species as well as other aspects that are identified in footnote X, cultural continuity, wellbeing, safety, and sense of place, and use these pathways inform scoping, modelling, and interpretation;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment. <u>Relatives</u> to be replaced with <u>Species as well as other aspects that are identified in footnote X.</u> Footnote X: Species as well as other aspects that are identified in XX (footnote number) including; human and non-human Beings, such as the Land, Air, Waters, and all Animal, Plant, Bird, Fish, and Little Spirit Beings (Relatives). It acknowledges worldviews that hold that all beings are Related and encompasses cultural and spiritual relationships with place.	For update on the use of “relatives” see OPG response to comment 2(III).
71	4.0 – Assessment Methodology	Include criteria and benchmarks for significance determinations, when describing perspectives and tolerance levels of First Nations and other Indigenous communities, co-developed with interested communities, to reflect community thresholds and interpretations of impact severity, duration and consequence, including considerations of cultural continuity, wellbeing and intergenerational effects. Incorporating defined thresholds and interpretations of non-negligible impacts as defined by First Nations and other Indigenous communities, and include explicit documentation of how First Nations and other Indigenous	Where provided, and consistent with the permitted uses identified by First Nations and other Indigenous communities sharing information or input, include criteria and benchmarks for significance determinations, when describing perspectives and tolerance levels of First Nations and other Indigenous communities, and where feasible, co-developed with interested communities, to reflect community thresholds and interpretations of impact severity, duration and consequence, including considerations of cultural continuity, wellbeing and intergenerational effects. Where provided, incorporating incorporate	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		communities input influenced conclusions;	defined thresholds and interpretations of non-negligible impacts as defined by First Nations and other Indigenous communities, and include explicit documentation of how First Nations and other Indigenous communities input influenced conclusions;		
72	4.0 – Assessment Methodology	Include mitigation measures developed in collaboration with First Nations and other Indigenous communities in considering which measures are required to mitigate effects, particularly to culturally important Relatives and landscapes. The proponent must consider an avoidance-first approach where First Nations and other Indigenous communities identify Relatives of specific interest or concern to them or places. First Nations and other Indigenous communities should be involved in defining required mitigation, adequacy, and thresholds where mitigation is considered insufficient;	Include mitigation measures developed in collaboration with First Nations and other Indigenous communities in considering which measures are required to mitigate effects, particularly to culturally important species as well as other aspects that are identified in footnote X Relatives and landscapes or identify the process to continue development of adaptive management strategies through the IA, follow-up monitoring and/or future licensing stages . The proponent must will consider an avoidance-first approach where First Nations and other Indigenous communities identify feasible, where residual adverse effects are identified to species as well as other aspects that are identified in footnote X Relatives or places of specific interest or concern to them or places. First Nations and other Indigenous communities should be involved in defining required mitigation, adequacy, and thresholds where mitigation is considered insufficient;	<u>Relatives</u> to be replaced with <u>Species as well as other aspects that are identified in footnote X</u> . Footnote X: Species as well as other aspects that are identified in XX (footnote number) including; human and non-human Beings, such as the Land, Air, Waters, and all Animal, Plant, Bird, Fish, and Little Spirit Beings (Relatives). It acknowledges worldviews that hold that all beings are Related and encompasses cultural and spiritual relationships with place.	See OPG response to comment number 2(III) related to the updated term 'Relatives'.
73	4.0 – Assessment Methodology	Integrate First Nation and other Indigenous community-led cumulative effects work (as available), including defined scenarios, stressors, and future-without-project conditions. Consider First Nation and other Indigenous community interpretations of existing cumulative	Integrate First Nation and other Indigenous community-led cumulative effects work (as available) , including defined scenarios, stressors, and future-without-project conditions . Consider First Nation and other Indigenous community interpretations of existing cumulative	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		impacts and acceptability related to the effects of the project.	impacts consistent with the permitted uses identified by each Indigenous group sharing information or input and acceptability related to the effects of the project.		
74	4.0 – Assessment Methodology	The proponent should also: Define and apply criteria and relevant benchmarks with First Nations and other Indigenous communities, including but not limited to the description of effects on Indigenous Peoples. Criteria may include those identified in Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples and other relevant criteria proposed by an Indigenous Nation and community. These criteria should be applied to determine the extent to which adverse effects on Indigenous Peoples are significant.	The proponent should also: Define and apply criteria and relevant benchmarks with First Nations and other Indigenous communities, consistent with the permitted uses identified by each First Nation or other Indigenous community sharing information or input , including but not limited to the description of effects on Indigenous Peoples. Criteria may include those identified in Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples and other relevant criteria proposed by an Indigenous Nation and community. These criteria should be applied to determine the extent to which adverse effects on Indigenous Peoples are significant. As per Section 7.0, the proponent must respect each First Nation or other Indigenous community's preferences for assessing impacts, and discuss with each First Nation or other Indigenous community whether it is appropriate for the proponent to provide its own conclusions regarding (residual and cumulative) impacts on Indigenous People and their rights. If a First Nation or Indigenous community has provided their own conclusion, the proponent is not required to provide one.	Adjusted language previously from "group" to reflect "First Nations and Indigenous Communities" - OPG is recommending updated term for consistency in the paragraph.	Adjusted language previously from "group" to reflect "First Nations and Indigenous Communities" - OPG is recommending updated term for consistency in the paragraph.
75	5.2 – Geology, geochemistry and geological hazards	The baseline information should address the criteria contained in the following documents in the Compendium: sections 3.5.5 and 3.5.6 and appendices C.3.4 and	The baseline information should address the criteria contained in the following documents in the Compendium: sections 3.5.5 and 3.5.6 and appendices C.3.4 and	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		C.3.5 in REGDOC-1.1.1 [3]; section B.4.1 in REGDOC-2.9.1 [16]; Appendix A to Part 100 in NRC Regulations (10 CFR) [21]; CSA N289.2 [20]; CSA N289.3 [22]; International Atomic Energy Agency NS-G-3.6 [23]; and International Atomic Energy Agency NS-R-3 (Rev1) [24].	C.3.5 in REGDOC-1.1.1 [3]; section B.4.1 in REGDOC-2.9.1 [16]; Appendix A to Part 100 in NRC Regulations (10 CFR) [21]; CSA N289.2 [20] and CSA N289.3 [22]; International Atomic Energy Agency NS-G-3.6 [23]; and International Atomic Energy Agency NS-R-3 (Rev1) [24] should be used as guidance.		
76	5.2.1 – Baseline Conditions	Describe the geomorphology, topography and geology of areas proposed for the project;	Describe the geomorphology, topography and geology of areas proposed for the project;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
77	5.3.1 – Baseline conditions	The baseline information should address appropriate federal and provincial guidelines and the criteria contained in the following documents in the Compendium: [25]; [26]; and [27].	The baseline information should address appropriate federal and provincial guidelines and the criteria contained in the following documents in the Compendium: [25]; [26]; and [27] as well, screen baseline sediment quality data against applicable guidelines, including from CCME [39] CEQG [39], and Ontario [40]; If an appropriate baseline study demonstrates that natural background exceeds the available standards or guidelines (or that none exist for the contaminants of potential concern (COPC⁶) of interest), sediment quality benchmarks from the peer-reviewed scientific literature should be used with appropriate rationale;	No update.	The MS-WTFN did not identify specific comments on this item.
78	5.3.2 –Effects to topography, soil and sediment	The Impact Statement must describe all effects of the project on topography, soil and sediment including: potential and likelihood of problematic erosion from movement or redistribution of soil and overburden, vegetation clearing, and watercourse diversions;	The Impact Statement must describe all effects of the project on topography, soil and sediment including: potential for and likelihood of soil problematic erosion (e.g., wind, water) resulting movement or redistribution of soil and overburden, vegetation clearing, and watercourse diversions from terrain disturbance, removal of vegetation, exposure of	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
			soil and overburden, or changes to landform stability associated with project activities.		
79	5.5 – Electromagnetism and corona discharge	The Impact Statement must: describe ozone concentrations;	The Impact Statement must: describe ozone concentrations;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
80	5.5 – Electromagnetism and corona discharge	The Impact Statement must: describe predicted electromagnetic field levels;	The Impact Statement must: describe predicted electromagnetic field levels;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
81	5.5 – Electromagnetism and corona discharge	The Impact Statement must: evaluate electromagnetic emitters in the region during operations, with respect to their potential to affect the safe operation of the reactor facility.	The Impact Statement must: evaluate electromagnetic emitters in the region during operations, with respect to their potential to affect the safe operation of the reactor facility.	No update.	The MS-WTFN did not identify specific comments on this item.
82	5.5 – Electromagnetism and corona discharge	The Impact Statement must: identify the potential for electromagnetic interference with radio, television or other telecommunication signals and reception at maximum loading and describe the area potentially affected, the frequency and duration of occurrence and any applicable standards;	The Impact Statement must: identify the potential for electromagnetic interference with radio, television or other telecommunication signals and reception at maximum loading output and describe the spatial extent of the area potentially affected, the persistence frequency and duration of occurrence and any applicable standards;	No update.	The MS-WTFN did not identify specific comments on this item.
83	5.6.1 –Baseline conditions	Provide baseline ambient air concentrations for contaminants, in particular near key receptors (e.g. communities, traditional land users, wildlife) and quantify emission sources for the following: polycyclic aromatic compounds, including polycyclic aromatic hydrocarbons (PAHs), alkylated PAHs, PAH transformation products, including nitro and oxy-PAHs, and dibenzothiophenes;	Polycyclic aromatic compounds, including polycyclic aromatic hydrocarbons (PAHs - specifically B(a)P), alkylated PAHs, PAH transformation products, including nitro and oxy-PAHs, and dibenzothiophenes;	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	As per MECP/TEF practice, BaP can be used as the carcinogenicity surrogate of alkylated PAHs, PAH transformation products, including nitro- and oxy-PAHs, and dibenzothiophenes on basis of previous rationale [measure parent PAHs via PUF (TO-13A). Alkylated, nitro-, oxy-PAHs and dibenzothiophenes - H226 are excluded because there is no AAQCs/CAAQS nor standardized, regulatory-accepted ambient air reference methods for these.
84	5.6.1 –Baseline conditions	diesel particulate matter;	diesel particulate matter;	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
85	5.6.1 – Baseline conditions	Provide baseline ambient air concentrations for contaminants, in particular near key receptors (e.g. communities, traditional land users, wildlife) and quantify emission sources for the following: nuclear emissions including tritium oxide and tritium gas, carbon 14, noble gases, iodine-131, and particulates;	Provide baseline ambient air concentrations for contaminants, in particular near key receptors (e.g. communities, traditional land users, wildlife) and quantify emission sources for the following: Nuclear emissions including tritium oxide and tritium gas, carbon 14, noble gases, iodine-131, and particulates;	No update.	The MS-WTFN did not identify specific comments on this item.
86	5.6.1 – Baseline conditions	provide baseline ambient air concentrations for contaminants, in particular near key receptors (e.g. communities, traditional land users, wildlife) and quantify emission sources for the following: - hydrazine; - morpholine	hydrazine morpholine	No update.	The MS-WTFN did not identify specific comments on this item.
87	5.6.1 – Baseline conditions	Provide baseline ambient air concentrations for contaminants, in particular near key receptors (e.g. communities, traditional land users, wildlife) and quantify emission sources for the following: PFAS	PFAS	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	OPG is focusing on effects pathways, rather than on standards against which to compare (policy catching up on science). OPG continues to recommend removal of PFAS as a TISG requirement on the basis of previous rationale that there is no AAQC/CAAQS and no standardized, regulatory-accepted ambient air reference method. Potential releases are not expected to produce measurable ambient air contributions, as primary PFAS pathways affect soil/water rather than air. Note that PFAS can be assessed in the effects assessment via air dispersion modelling, using a chemical profile from the soils sampling program and predictions from fugitive dust during site preparation and construction.
88	5.6.1 – Baseline conditions	Provide baseline ambient air concentrations for contaminants, in particular near key receptors (e.g. communities, traditional land users, wildlife) and quantify emission sources for the following: ammonia	ammonia	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	OPG continues to recommend excluding ammonia from baseline monitoring based on the rationale that the Project is not a primary or continuous source of ammonia emissions, and baseline ambient air concentrations are expected to be low. The nearest point source is approximately 9 km away, agricultural activity in

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
					the area is limited, and there are no other known concentrated sources nearby. As a result, ambient ammonia concentrations are expected to represent only a small fraction of the Ontario Ambient Air Quality Criteria (AAQC), meaning baseline monitoring would provide limited additional value. In addition, the PM2.5 monitoring program captures the relevant secondary-formation pathway associated with ammonia. Any Project-related ammonia emissions, if applicable, would be addressed through dispersion modelling in accordance with REGDOC-1.1.1.
89	5.6.1 – Baseline conditions	Describe dust and acid deposition through either existing long-term or new monitoring data for a duration of a minimum of one year;	Describe Project-specific dust and acid deposition rates through dispersion modelling using conservative parameterization and multi-year meteorological datasets ; either existing long-term or new monitoring data for a duration of a minimum of one year;	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	OPG would like to clarify that the intent of Comment 89 is not to defer site-specific dust-fall and acid deposition monitoring. The intent of Comment 89 is to eliminate the description of existing conditions of dust-fall and acid deposition. The OPG mark-ups clarify that project-specific dust and acid deposition rates (project effects) will be modelled. Description of dust-fall and acid deposition existing conditions through either existing long-term or new monitoring data for a duration of a minimum of one year is not required because OPG will use the CALPUFF model to determine wet/dry deposition, which supports deferring acid deposition and dust-fall to the effects assessment phase.
90	5.6.1 – Baseline conditions	Provide current ambient noise and vibration levels at key receptor points (e.g. communities, traditional land users, sensitive human receptors and wildlife), including the results of a baseline ambient noise and vibration survey and permissible noise levels for each receptor. The information on usual noise and vibration sources (natural or anthropogenic), their geographic extent and temporal variations must be included. At the time of collecting	Provide current ambient noise and vibration levels at key receptor points (e.g. communities, traditional land users, sensitive human receptors and wildlife), including the results of a baseline ambient noise and vibration survey and permissible noise levels for each receptor. The information on usual noise and vibration sources (natural or anthropogenic), their geographic extent and temporal variations must be included. At the time of collecting	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	OPG would like to clarify that vibration will be considered in the effects assessment, the revision is only intended to remove the requirement for measurements as part of baseline. Vibrations can be assessed in the effects assessment using a conservative assumption of imperceptible or near-zero ambient conditions. The assessment of effects will consider all relevant sources of project-specific vibration emissions, and where necessary follow-up monitoring programs will

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		baseline data for the study on ambient noise and vibrations where there are human receptors, it is recommended that the following aspects be considered:	baseline data for the study on ambient noise and vibrations where there are human receptors, it is recommended that the following aspects be considered:		be developed to address species-specific or habitat concerns.
91	5.6.1 –Baseline conditions	Provide current underwater soundscape and vibration sources, within the study areas and at the project site, based on acoustic measurements. Provide information on vibration and sound sources, geographic extent and spatial and temporal variations within the water column and at the lake bed;	Provide current underwater soundscape and vibration sources, within the study areas and at the project site, based on acoustic measurements. Provide information on vibration and sound sources, geographic extent and spatial and temporal variations within the water column and at the lake bed;	No update.	The MS-WTFN did not identify specific comments on this item.
92	5.6.2 –Effects on the atmospheric, acoustic, and visual environment	Conduct a source contribution analysis to assess the relative contributions of project and non-project emission sources on pollutant concentrations at key receptors. The source contribution analysis should be conducted for all pollutants that exceed 10% of the relevant guidance or standard value. Emission sources should be grouped into appropriate categories;	Conduct a source contribution analysis to assess the relative contributions of project and non-project emission sources on to predicted pollutant concentrations at key receptors. The source contribution analysis should be conducted for all pollutants that exceed 10% of the relevant guidance or standard value. Emission sources should be grouped into appropriate categories; The analysis should be conducted for all pollutants where predicted concentrations exceed 10% of the applicable ambient air quality standard or guideline. Project emission sources should be grouped into operationally meaningful categories. Non-project contributions will be represented by ambient baseline monitoring data, supplemented by available provincial resources, with qualitative discussion of likely contributing sources. and non-project emission sources on pollutant concentrations at key receptors. The source contribution analysis should be conducted for all pollutants that exceed 10% of the relevant guidance or standard value. Emission sources should be grouped into appropriate categories;	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	OPG would like to clarify that it is not our intention to exclude "non-project" emission sources from analysis on the effects to the atmospheric, acoustic, and visual environment. The intent of Comment 92 is to exclude non-project sources from the source contribution analysis only. The source contribution analysis investigates what portion of emissions comes from specific sources. Non-project sources are challenging to consider in the detailed source contribution analysis since they are numerous and outside OPG's control. Non-project sources are therefore represented in aggregate by baseline monitoring, which captures the cumulative non-project contribution and is the quantity relevant to assessing the project increment.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
93	5.6.2 – Effects on the atmospheric, acoustic, and visual environment	Provide the hourly distribution of baseline night-time sound events compared to the individual nighttime sound events expected at each receptor location;	Assess the change in night-time sound levels as result of the project at receptor locations. provide the hourly distribution of baseline night-time sound events compared to the individual nighttime sound events expected at each receptor location;	No update.	The MS-WTFN did not identify specific comments on this item.
94	5.6.2 – Effects on the atmospheric, acoustic, and visual environment	Provide a description of any changes in nighttime light levels resulting from the project: quantify light levels at appropriate distances from any project facilities, including the timing (e.g. night hours), frequency, duration, distribution and character of light emissions;	Provide a description of any changes in nighttime light levels resulting from the project: quantify describe light levels at appropriate distances from any project facilities, including the timing (e.g. night hours), frequency, duration and distribution and character of light emissions;	No update.	The MS-WTFN did not identify specific comments on this item.
95	5.7.1 – Groundwater and surface water	Quantify the existing surface water conditions, including the full range of seasonal and inter-annual variations, (including variations in inflows, outflows, water surface elevations, net loss, including evaporation and seepage. and storage volumes and retention time), ice cover and snow regime. This may be based on data from on-site gauging stations or from reference regional gauging stations;	Quantify the existing surface water conditions, including the full range of available seasonal and inter-annual variations, (including variations in inflows, outflows, water surface elevations, net loss, including evaporation and seepage. and storage volumes and retention time), ice cover and snow regime. This may be based on data from on-site gauging stations or from reference regional gauging stations;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
96	5.7.1 – Groundwater and surface water	For Lake Ontario, the description should include the size, location, and elevation of outlets, and elevation-area-capacity curves; and	For Lake Ontario, the description should include the size, location, and elevation of outlets, and elevation-area-capacity curves where these are influenced by intake or discharge structures; and	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	Our understanding of the intent of this clause is for detail to be provided on outlets from lakes so the levels and flows through lakes without a project are clear and project effects on those dynamics are understood. This clause may be based on the REGDOC-1.1.1 clause C4.3 reading "For each of the lakes or major waterbodies described, the following information should be documented:

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
					- where influenced by the intake or discharge structures, size, location, and elevation of outlets", which was used in the current tailoring recommendation. A number of the comments on TISG Section 5.7, including this comment, are intended to prompt adjustment of the guidelines to better reflect that water levels in Lake Ontario are regulated at the Moses Saunders Power Dam and Long Sault Dam, which meaningfully influence the way the project and lake levels will interact.
97	5.7.1 – Groundwater and surface water	For each water body used as a heat sink or process water source, information about maximum, average maximum, average, average minimum, and minimum monthly temperature and monthly flow of the water bodies;	For each water body used as a heat sink or process water source, provide available information used to understand temperature and flow, (which may include validation of maximum, average maximum, average, average minimum, and minimum monthly temperature and monthly flow of the water bodies);	OPG is proposing revision to its original recommendation related to the yellow highlighted text, and in alignment with Environment and Climate Change Canada (ECCC) as part of their comments on the draft TISG (see ECCC-24). "For each water body used as a heat sink or process water source, information about maximum, average maximum, average, average minimum, and minimum monthly temperature in the LSA within Lake Ontario, including at the locations of proposed inlet and outlet structures and monthly flow of the water bodies;"	A number of the comments on TISG Section 5.7 are intended to prompt adjustment of the guidelines to better reflect measures appropriate for Lake Ontario. ECCC's suggested edits, in their comments on the draft TISG, achieves this by recognizing that water levels in Lake Ontario are regulated at the Moses Saunders Power Dam and Long Sault Dam. As a result, the ECCC suggested phrasing removes monthly flow rates and focuses the clause to understanding water temperature focused on an area around potential intake and discharge locations where effects of the Project may occur. OPG's tailoring recommendations reflect an appropriate spatial scale for the metrics requested, which is also reflected in the ECCC recommended text.
98	5.7.1 – Groundwater and surface water	Characterize and describe upwelling and downwelling, including an analysis of duration, frequency, intensity-thermal/spatial and seasonality of these events, in the LSA within Lake Ontario. See Environmental Effects Assessment of Freshwater Thermal Discharge, 2019 [36] for more guidance;	Characterize and describe large upwelling and downwelling events , including an (which may include analysis of duration, frequency, intensity-thermal/spatial and seasonality of these events), in the LSA within Lake Ontario. See Environmental Effects Assessment of Freshwater Thermal Discharge, 2019 [42] for more guidance;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
99	5.7.1 – Groundwater and surface water	Provide complete hydrometeorological information (temperature, precipitation, evapotranspiration), based on data from nearby weather stations or from a weather station on site;	Provide complete hydrometeorological information (temperature, precipitation, evapotranspiration), based on data from climate change-adjusted weather fields (for the lake model) from nearby weather stations or from a weather station on site for groundwater and inland surface water;	No update.	The MS-WTFN did not identify specific comments on this item.
100	5.7.1 – Groundwater and surface water	Provide flow hydrographs and corresponding water levels for nearby streams and rivers showing the full range of seasonal and inter-annual variations, as well as seasonal baseflow:	Provide flow hydrographs and corresponding water levels for nearby streams and rivers showing the full range of including seasonal and inter-annual variations, as well as seasonal baseflow where available;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
101	5.7.1 – Groundwater and surface water	Provide stage hydrographs for lakes expected to be affected by the project showing the full range of seasonal and inter-annual water level variations;	Provide stage hydrographs for lakes expected to be affected by the project showing the full range of seasonal and inter-annual Describe lake water level variation characteristics (may include stage hydrographs);	OPG is proposing revision to its original recommendation related to the yellow highlighted text, and in alignment with Environment and Climate Change Canada (ECCC) as part of their comments on the draft TISGs. Provide stage hydrographs for lakes expected to be affected by the project showing the full range of seasonal and inter-annual water level variations; Provide an analysis of Lake Ontario applicable regulation plan(s) and relevant historic data in the baseline characterization of lake level and flow regulation in Lake Ontario.	The intention in tailoring for this clause was to allow more flexibility in the type of information used to explain the relationship between flow and water levels in Lake Ontario (rather than stage hydrographs) where Lake Ontario is unique in having these elements controlled by the Moses Saunders Power Dam and Long Sault Dam. In their comments on the TISG ECCC noted: "With respect to baseline characterization for Lake Ontario water levels, "flow hydrographs and corresponding water levels" as well as "stage hydrographs for lakes" are requirements in the draft TISG. However, there seems to be no recognition for the fact that Lake Ontario is regulated at the Moses Saunders Power Dam and Long Sault Dam. Lake Ontario water level may influence aquatic effects of discharges from the proposed Project. Without understanding the regulation of water levels in Lake Ontario through the inclusion of Lake Ontario regulation plans and historic lake water level records, any assessment of flows and levels in Lake Ontario would likely be incomplete."

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
102	5.7.1 – Groundwater and surface water	Include modelling, such as hydrodynamic modelling, to characterize coastal processes, including a quantitative sediment movement and size spectrum through littoral transport, flow directionality, velocity, and shear stress. Modelling should also examine shoreline recession rates and sediment inputs.	Include modelling, such as hydrodynamic modelling, to characterize coastal processes. Include including a quantitative assessment of potential for sediment movement and size spectrum through littoral transport, flow directionality, velocity, and shear stress. Modelling-Assessment should also examine shoreline recession rates and sediment inputs;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
103	5.7.1 – Groundwater and surface water	For each waterbody potentially affected by the project, provide bathymetry, maximum and mean depths, vertical profile information, information on stratification and turnover, and sediment composition (e.g. particle size analysis and sediment quality);	For each waterbody potentially affected by the project, provide bathymetry, maximum and mean depths, vertical profile information, information on stratification and turnover, and sediment composition (e.g. particle size analysis and sediment quality) and/or describe when and how this information may be validated or confirmed through follow-up and monitoring programs;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
104	5.7.1 – Groundwater and surface water	Using traditional field and mapping techniques, provide a delineation and characterization of groundwater–surface water interactions, including an identification of groundwater-dependent ecosystems, wetlands, discharge and recharge areas that are potentially affected by the project;	Using traditional field and mapping techniques, provide a delineation and characterization of groundwater–surface water interactions, including an identification of groundwater-dependent ecosystems, wetlands, discharge and recharge areas that are potentially affected by the project and/or describe when and how this information may be validated or confirmed through follow-up and monitoring programs;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
105	5.7.1 – Groundwater and surface water	Develop a quantitative surface water balance for watersheds potentially affected by the project, for all phases of the project detailing water intake and outfall to the environment, including upstream and downstream of the zones of influence;	Develop a quantitative surface water balance for watersheds potentially affected by the project, for all phases of the project detailing using estimated water intake and outfall to the environment, including upstream and downstream of the zones of influence;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
106	5.7.1 – Groundwater and surface water	Characterization program should include sampling locations within the PA, the LSAs and RSAs, and should include reference locations that are unlikely to be impacted by the project. Provide a detailed map that indicate the sampling locations;	Characterization program should include sampling locations information within the PA, the LSAs and RSAs, and should include reference locations that are unlikely to be impacted by the project. Provide a detailed map that indicate the sampling locations;	No update.	The MS-WTFN did not identify specific comments on this item.
107	5.7.1 – Groundwater and surface water	Provide baseline data for relevant physicochemical parameters and chemical constituents for surface water, groundwater and sediment quality that are expected to change throughout the project lifecycle; including temporal trends and groundwater surface water interactions, representative of seasonal and inter-annual variability and spatial representation relevant to the project components, the LSA and the RSA. The data should be presented in a compiled, tabulated, and graphed form using appropriately sensitive detection limits, and include estimates relevant to the project activities and components.	Provide baseline data for relevant physicochemical parameters and chemical constituents for surface water and groundwater and sediment quality that are expected to change throughout the project lifecycle; including available information characterizing relevant temporal trends and groundwater surface water interactions, representative of seasonal and inter-annual variability and spatial representation relevant to the project components, the LSA and the RSA. The data should be presented in a compiled, tabulated, and graphed form using appropriately sensitive detection limits, and include estimates relevant to the project activities and components.	No update.	The MS-WTFN did not identify specific comments on this item.
108	5.7.1 – Groundwater and surface water	Water sample collection and analysis should use appropriately sensitive detection limits and the data should illustrate the seasonal and inter-annual variability in baseline surface water quality with sufficient years of baseline data to fully characterize natural variability, including possible variabilities due to groundwater–surface water interactions; and	Water sample collection and analysis should use appropriately sensitive detection limits and describe how and the data should illustrate the seasonal and inter-annual variability in baseline surface water quality will be considered with sufficient years of baseline data to fully characterize natural variability), including possible variabilities due to groundwater–surface water interactions; and	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment. OPG is proposing revision to its original recommendation related to the yellow highlighted text, based on MS-WTFNs position. Water sample collection and analysis should use appropriately sensitive detection limits and the data should illustrate the seasonal and inter-annual variability in baseline surface water quality with sufficient years of baseline data to fully characterize natural variability),	OPG recommends that the word 'fully' is removed to make this requirement more feasible.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
				including possible variabilities due to groundwater–surface water interactions; and	
109	5.7.1 – Groundwater and surface water	Physical and chemical parameters may include particle size, moisture content metal/metalloids, total sulphur, total organic carbon, polycyclic aromatic compounds, persistent organic pollutants. Sediment samples should target silt-clay range (<63 um) and include appropriate replication to describe site heterogeneity.	Physical and chemical parameters may include particle size, moisture content metal/metalloids, total sulphur, total organic carbon, polycyclic aromatic compounds, persistent organic pollutants. Sediment samples should target silt-clay range (<63 um) and include appropriate replication to describe site heterogeneity.	No update.	The MS-WTFN did not identify specific comments on this item.
110	5.7.1 – Groundwater and surface water	Screen baseline sediment quality data against applicable guidelines, including from CCME [39], CEQG [39], and Ontario [40];	Screen baseline sediment quality data against applicable guidelines, including from CCME [39], CEQG [39], and Ontario [40];	No update.	The MS-WTFN did not identify specific comments on this item.
111	5.7.1 – Groundwater and surface water	If an appropriate baseline study demonstrates that natural background exceeds the available standards or guidelines (or that none exist for the contaminants of potential concern (COPC) of interest), sediment quality benchmarks from the peer-reviewed scientific literature should be used with appropriate rationale;	if an appropriate baseline study demonstrates that natural background exceeds the available standards or guidelines (or that none exist for the contaminants of potential concern (COPC) of interest), sediment quality benchmarks from the peer-reviewed scientific literature should be used with appropriate rationale;	No update.	The MS-WTFN did not identify specific comments on this item.
112	5.7.1 – Groundwater and surface water	Provide a summary of key groundwater monitoring wells within the RSA used to inform the conceptual model, and identify their location, groundwater quality information and monitoring frequency. Provide representative hydrographs showing the range of seasonal and inter-annual water level variations and indicate any spatial variation in the RSA.	Provide a summary of key groundwater monitoring wells within the RSA used to inform the conceptual model, and identify their location, groundwater quality information and monitoring frequency. Provide representative hydrographs showing the Describe the range of seasonal and inter-annual water level variations and indicate any spatial variation in the RSA (may include use of representative hydrographs).	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
113	5.7.1 – Groundwater and surface water	Present a 3-dimensional numerical geological model developed for the site, local, and regional study areas based on the conceptual model of the geological environment;	Present a 3-dimensional numerical geological groundwater flow model developed for the site, local, and regional study areas based on the conceptual model of the geological environment;	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
114	5.7.1 – Groundwater and surface water	State limitations and assumptions in the modelling approach, including calibration methods, model validation and accuracy; and a description of how uncertainty is quantified;	State limitations and assumptions in the modelling approach, including calibration methods, model validation and accuracy and a description of how uncertainty is quantified how limitations or assumptions may be validated or confirmed through follow up and monitoring programs;	OPG is proposing revision to its original recommendation related to the yellow highlighted text, based on MS-WTFNs position. "State limitations and assumptions in the modelling approach, including calibration methods, model validation and accuracy and a description of how uncertainty is quantified including where limitations or assumptions may continue to be validated or confirmed; "	Follow-up programs are an integral element of the Impact Assessment process wherein a proponent verifies the accuracy of an IA and the effectiveness of mitigation measures, and takes corrective actions, as required. OPG's effects assessment, including models, will be based on conservative assumptions and will incorporate views shared by the MS-WTFNs, government reviewers, and key stakeholders. OPG intends to leverage future processes, such as the follow-up program, to validate those assumptions. As outlined in Section 1.4 of the draft Integrated Guidelines, "Where the proponent considers that certain information or studies may be generated progressively over time, they should clearly demonstrate how the information available at the integrated assessment stage is sufficient to support sound conclusions and decision-making. This includes explaining how any remaining uncertainties will be understood and managed, and how subsequent information would be incorporated in a manner that maintains the integrity and objectives of the assessment." For quantitative models supporting this assessment (groundwater flow models, lake models) additional monitoring for existing site-specific seasonal data to use in validation of the model outcomes may continue beyond initial modelling scenarios. The recommended tailoring of clauses is intended to recognize this.
115	5.7.1 – Groundwater and surface water	Calibrate the numerical model to baseline geological conditions using groundwater level and stream flow monitoring data and provide metrics and graphs describing the quality of the calibration that was achieved and discuss how spatial variability is considered in model calibration; and	Calibrate the numerical model to baseline geological conditions using groundwater level and stream flow monitoring data and provide metrics and graphs describing the quality of the calibration that was achieved and/or may be validated or confirmed through follow up and monitoring programs and	OPG is proposing revision to its original recommendation related to the yellow highlighted text, based on MS-WTFNs position: Calibrate the numerical model to baseline geological conditions using groundwater level and stream flow monitoring data and provide metrics and graphs describing the quality of the calibration that was achieved including	Follow-up programs are an integral element of the Impact Assessment process wherein a proponent verifies the accuracy of an IA and the effectiveness of mitigation measures, and takes corrective actions, as required. OPG's effects assessment, including models, will be based on conservative assumptions and will incorporate views shared by the MS-WTFNs, government reviewers, and key stakeholders. OPG intends to leverage future processes, such as the follow-up

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
			discuss how spatial variability is considered in model calibration; and	where limitations or assumptions may continue to be validated or confirmed and discuss how spatial variability is considered in model calibration; and	program, to validate those assumptions. As outlined in Section 1.4 of the draft Integrated Guidelines, "Where the proponent considers that certain information or studies may be generated progressively over time, they should clearly demonstrate how the information available at the integrated assessment stage is sufficient to support sound conclusions and decision-making. This includes explaining how any remaining uncertainties will be understood and managed, and how subsequent information would be incorporated in a manner that maintains the integrity and objectives of the assessment." For quantitative models supporting this assessment (groundwater flow models, lake models) additional monitoring for existing site-specific seasonal data to use in validation of the model outcomes may continue beyond initial modelling scenarios. The recommended tailoring of clauses is intended to recognize this.
116	5.7.1 – Groundwater and surface water	Present a 3-dimensional numerical geological model developed for the site, local, and regional study areas based on the conceptual model of the geological environment;	Add as additional bullet: where applicable, chemical or isotopic tracer data that provide constraints on fluid direction, flow velocity or mixing should be included;	No update.	The MS-WTFN did not identify specific comments on this item.
117	5.7.1 – Groundwater and surface water	Present a conceptual model for the hydrological environment, as appropriate to describe baseline conditions for surface waters. The model should be developed to support the assessment of potential changes to water and sediment quantity and quality in rivers, streams, lakes, springs and wetlands, with input from regulators;	Present a conceptual model for the hydrological environment, as appropriate to describe baseline conditions for surface waters. The model should be developed to support the assessment of potential changes to water and sediment quantity and quality in rivers, streams, lakes, springs and wetlands, with input from regulators as required;	No update.	The MS-WTFN did not identify specific comments on this item.
118	5.7.1 – Groundwater and surface water	Chemical or isotopic tracer data that provide constraints on fluid direction, flow velocity or mixing should be included;	Chemical or isotopic tracer data that provide constraints on fluid direction, flow velocity or mixing should be included;	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
119	5.7.2 – Groundwater and surface water	Present an integrated site water balance model incorporating surface and groundwater fluxes to or from all major project components, for all project phases. Include estimates of surface water runoff rates for major project components;	Present a conceptual integrated site water balance model incorporating surface and groundwater fluxes to or from all major project components, for all project phases. Include estimates of surface water runoff rates for major project components;	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	Tailoring is recommended to reduce redundancy and manage any expectation that a separate water balance would be generated for specific site features (e.g., parking lot A.); the site water balance would include applicable runoff rates.
120	5.7.2 – Groundwater and surface water	Indicate the groundwater and surface water withdrawal requirements during all phases and specify:	Indicate the plans for groundwater and surface water withdrawal requirements during all phases and how the following specifications will be confirmed:	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	Estimated surface and groundwater withdrawal will be developed for the IS informed by OPG's experience on excavation required for similar projects and in the region. These estimates will be used to understand effects and develop mitigation measures. It is recognized that design detail will follow after the completion of the Impact Statement, as a reactor technology is confirmed and the findings of the IA are reflected. Water withdrawal metrics can be accurately developed at these later stages of the design refinement.
121	5.7.2 – Groundwater and surface water	Present key flow rates for all project components and water management structures, including inflow, outflow or surface run off from storage piles, dredge materials, and contaminated material storage;	Present key flow rates for all project components and water management structures, including inflow, outflow or surface run off from storage piles, dredge materials, and contaminated material storage;	No update.	The MS-WTFN did not identify specific comments on this item.
122	5.7.2 – Groundwater and surface water	Present a comprehensive site water management plan for the project's lifecycle, including for: water inflows and outflows from project site; water diversion; process water management; stormwater management; and water management within the project site;	Present a comprehensive site water management plan for the project's lifecycle, including for: — water inflows and outflows from project site; — water diversion; — process water management; — stormwater management; and — water management within the project site;	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
123	5.7.2 – Groundwater and surface water	Demonstrate contaminant attenuation capacity empirically with field data and/or a numerical model (i.e., aquatic dispersion modelling). This model should also include a description of expected physical and geochemical reactions and transport mechanisms along flow paths (i.e., aqueous complexation, redox reactions, adsorption, ion exchange, colloidal transport, precipitation of solid phases, radioactive decay and ingrowth, advection, dispersion, diffusion) and how these were quantified or accounted for in the model;	Where determined necessary to inform issues material to decision-making, present the timing and process that will be used to demonstrate contaminant attenuation capacity empirically with field data and/or a numerical model (i.e., aquatic dispersion modelling). This model should also include a description of expected physical and geochemical reactions and transport mechanisms along flow paths (i.e., aqueous complexation, redox reactions, adsorption, ion exchange, colloidal transport, precipitation of solid phases, radioactive decay and ingrowth, advection, dispersion, diffusion) and how these were quantified or accounted for in the model;	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment. OPG maintains its tailoring recommendation in the blue highlighted text. In OPG's view, these comments have considerable implications on the scope of the information requirements as well as the IA schedule. Demonstrate contaminant attenuation capacity empirically with field data and/or a numerical model (i.e., aquatic dispersion modelling). This model should also include a description of expected physical and geochemical reactions and transport mechanisms along flow paths (i.e., aqueous complexation, redox reactions, adsorption, ion exchange, colloidal transport, precipitation of solid phases, radioactive decay and ingrowth, advection, dispersion, diffusion) and how these were quantified or accounted for in the model;	OPG maintains its recommendation on the blue highlighted text. While assessment of contaminant attenuation capacity would inherently consider the physical and transport mechanisms named, assessment of effects from geochemical change would be completed outside of the use of the modelling contaminant attenuation capacity.
124	5.7.2 – Groundwater and surface water	Describe the downgradient flow of groundwater affected by the project, with the use of figures showing groundwater piezometric contours, drawdown contours and particle tracking results;	Describe the predicted downgradient flow of groundwater affected by the project, with the use of figures showing groundwater piezometric contours, drawdown contours and if applicable , particle tracking results;	No update.	The MS-WTFN did not identify specific comments on this item.
125	5.7.2 – Groundwater and surface water	Describe the potential changes to surface water, groundwater, or sediment quality related to the project including:	Describe the potential changes to surface water or groundwater, or sediment quality related to the project including:	No update.	The MS-WTFN did not identify specific comments on this item.
126	5.7.2 – Groundwater and surface water	Changes to surface water, groundwater and sediment quality due to all discharges and effluents from the project, including changes to physicochemical parameters	Changes to surface water and groundwater and sediment quality due to all discharges and effluents from the project, including changes to	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		(temperature, pH, salinity, dissolved oxygen), and relevant chemical constituents (major and minor ions, trace metals, radionuclides, nutrients, organic compounds); and	physicochemical parameters (temperature, pH, salinity, dissolved oxygen), and relevant chemical constituents (major and minor ions, trace metals, radionuclides, nutrients, organic compounds); and		
127	5.7.2 – Groundwater and surface water	Using the integrated chemical mass balance model, describe predicted worst, base and sensitivity case changes caused by project activities to surface water, groundwater and sediment quality in the receiving environment, for both physicochemical parameters and chemical constituents, including but not limited to: - Watercourse and waterbody crossings, blasting, diversions, dewatering, water withdrawal, wastewater return, overflows from excavation, and surface runoff volumes and quality;	Using the integrated chemical mass balance, describe predicted worst, base and sensitivity case changes caused by project activities to surface water, groundwater and sediment quality in the receiving environment, for both physicochemical parameters and chemical constituent using the integrated chemical mass balance model where appropriate, including but not limited to: Watercourse and waterbody crossings, blasting, diversions, dewatering, water withdrawal, wastewater return, overflows from excavation, and surface runoff volumes and quality;	No update.	The MS-WTFN did not identify specific comments on this item.
128	5.7.2 – Groundwater and surface water	Compare the predicted worst, base and sensitivity case scenario changes to groundwater, surface and sediment quality to baseline and applicable guidelines, objectives or standards;	Compare the predicted worst, base and sensitivity case scenario changes to groundwater, surface and sediment quality to baseline and applicable guidelines, objectives or standards;	No update.	The MS-WTFN did not identify specific comments on this item.
129	5.7.2 – Groundwater and surface water	Provide an assessment for off-site migration pathways for impacted groundwater, and an analysis of contaminant attenuation capacities within the hydrogeological units of the project study area;	Provide an assessment for Where determined necessary to inform issues material to decision-making, present the timing and process that will be used to assess off-site migration pathways for impacted groundwater, and an analysis of contaminant attenuation capacities within the hydrogeological units of the project study area;	No update.	The MS-WTFN did not identify specific comments on this item.
130	5.7.2 – Groundwater and surface water	Describe locations at which potential changes to water or sediment quality will be assessed, including:	Describe locations at which potential changes to water or sediment quality will be assessed, including:	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
131	5.7.2 – Groundwater and surface water	The proponent should refer to Health Canada's Guidance for Evaluating Human Health Impacts in Impact Assessments: Drinking and Recreational Water Quality [41] to ensure that it provides the information and analysis considered necessary to assess the project's effects on human health in relation to changes to water quality. The proponent should complete the checklist provided in this guide (Appendix A) to assist participants in verifying that the main elements of a water quality impact assessment have been completed and in identifying the location of this information in the Impact Statement. This checklist will facilitate the review of the Impact Statement and will be particularly useful if analyses on this aspect are found in several sections of the Impact Statement.	The proponent should refer to Health Canada's Guidance for Evaluating Human Health Impacts in Impact Assessments: Drinking and Recreational Water Quality [41] to ensure that it provides explanation of where in the Impact Statement or through future programs the information and analysis considered necessary to assess the project's effects on human health in relation to changes to water quality. The proponent should complete the checklist provided in this guide (Appendix A) to assist participants in verifying that the main elements of a water quality impact assessment have been completed and in identifying the location of this information in the Impact Statement. This checklist will facilitate the review of the Impact Statement and will be particularly useful if analyses on this aspect are found in several sections of the Impact Statement.	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
132	5.8.1 – Baseline conditions	Quantify, describe and map wetlands (e.g. fens, swamps, marshes, peat lands, bogs), including ephemeral wetlands within the LSA and RSA potentially affected by the project, in the context of:	Quantify, describe and map wetlands (e.g. fens, swamps, marshes, peat lands, bogs), including ephemeral wetlands within the LSA and RSA potentially affected by the project, in the context of:	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	Ephemeral wetlands within the NNW site (Project Area) have been mapped and the potential for effects to these features and associated habitat functions will be addressed in the IS. Potential pathways of effects to ephemeral wetlands outside of the Project Area (i.e., LSA and/or RSA) are not anticipated given the general drainage patterns in the area from north to south, towards Lake Ontario. The site location on the Lake Ontario shoreline precludes the potential for downstream impacts to ephemeral wetlands outside of the Project Area.
133	5.8.2 –Effects on terrestrial, riparian and wetland environments	Describe potential changes to terrestrial, riparian and wetland environments as a result of any new, known or suspected soil contamination within the study areas that could be re-suspended, released or	Describe potential changes to terrestrial, riparian and wetland environments as a result of any new, known or suspected soil contamination within the study areas that could be re-suspended , released or	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		otherwise disturbed as a result of the project;	otherwise disturbed as a result of the project;		
134	5.9.2 –Effects on terrestrial wildlife and their habitat	Describe and quantify, where possible, the potential effects to wildlife, including acute and chronic effects to wildlife health, of changes to air and water quality (e.g. from radiation exposure, contaminants, effluents, atmospheric emissions, dust deposition, and bioaccumulation);	Describe and quantify, where possible, the potential effects to wildlife, including acute and chronic effects to wildlife health, of changes to air and water quality (e.g. from radiation exposure, contaminants, effluents, atmospheric emissions, dust deposition, and bioaccumulation);	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
135	5.10.2 –Effects on species at risk and their habitat	The Impact Statement must: present the explicit calculation of radiation doses to species at risk assessed by COSEWIC with recognized approaches and software tools (example of acceptable approach in CSA N288.6-22 [8] clause 7.3.4 Dose calculation methods, and clause 7.3.7 Models);	The Impact Statement must: present the explicit calculation of radiation doses to species at risk assessed by COSEWIC (or using surrogate species) with recognized approaches and software tools (example of acceptable approach in CSA N288.6-22 [8] clause 7.3.4 Dose calculation methods, and clause 7.3.7 Models);	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
136	5.10.2 –Effects on species at risk and their habitat	The proponent should consult with the Ontario Ministry of the Environment, Conservation, and Parks where an authorization under the Endangered Species Act [46] may be necessary and describe how and to what extent this process could address adverse effects.	The proponent should consult with the Ontario Ministry of the Environment, Conservation, and Parks where an authorization under the Endangered Species Act [54] Species Conservation Act may be necessary and describe how and to what extent this process could address adverse effects.	No update.	The MS-WTFN did not identify specific comments on this item.
137	5.11.1 – Baseline conditions for fish and fish habitat	Underwater soundscape and vibration, including those offshore, based on acoustic measurements, including vibration and sound sources, geographic extent, as well as spatial and temporal variations within the water column and at the lakebed,	Underwater soundscape and vibration, including those offshore, based on acoustic measurements, including vibration and sound sources, geographic extent, as well as spatial and temporal variations within the water column and at the lakebed,	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	OPG would like to clarify that the effects of noise and vibration will be addressed in the effects assessment using conservative assumptions of imperceptible or near-zero ambient conditions. The assessment of effects will consider all relevant sources of project-specific noise/vibration emissions, and where necessary follow-up monitoring programs will be developed to address specific concerns.
138	5.11.2 – Effects to fish and fish habitat	Changes to surface water and groundwater quality resulting from acid rock drainage and/or metal(loid) leaching	Changes to surface water and groundwater quality resulting from acid rock drainage and/or metal (loid)	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		from mined, excavated or blasted material, including:	leaching from mined, excavated or blasted material, including:		
139	5.11.2 – Effects to fish and fish habitat	Use a three-dimensional numerical groundwater flow model to simulate the hydrogeological system and estimate key water fluxes based on the calibrated baseline conditions model and include: major project components, including open pits, underground workings, waste rock piles, tailings management facilities, dewatering wells, water diversion ditches, and sediment ponds,	Use a three-dimensional numerical groundwater flow model to simulate the hydrogeological system and estimate key water fluxes based on the calibrated baseline conditions model and include: major project components, including open pits, underground workings, waste rock piles, tailings management facilities, dewatering wells, water diversion ditches, and sediment ponds,	No update.	The MS-WTFN did not identify specific comments on this item.
140	5.11.2 – Effects to fish and fish habitat	A consideration of all relevant material, including historical waste, such as waste rock, ore (including off-site), low grade ore, pit wall materials, underground development ramps, process waste (i.e. tailings, heap leach, treatment sludge, coarse coal rejects, processed kimberlite) overburden and potential construction material (i.e. mine rock, quarries, unconsolidated material), and	A consideration of all relevant material, including historical waste, such as waste rock, ore (including off-site), low grade ore, pit wall materials, underground development ramps, process waste (i.e. tailings, heap leach, treatment sludge, coarse coal rejects, processed kimberlite) overburden and potential construction material (i.e. mine rock, quarries, unconsolidated material), and	No update.	The MS-WTFN did not identify specific comments on this item.
141	5.11.2 – Effects to fish and fish habitat	A geochemical characterization study describing the spatial and compositional representativeness of samples, the analytical methods used to evaluate geochemical properties (including mineralogy, metal(loid) leaching, and acid generation potential), and the approach used to predict drainage chemistry trends over time, as well as how uncertainties will be addressed as the project advances. Consider relevant guidance, such as Mine Environment Neutral Drainage (MEND) report 1.20.1, International Network for Acid Prevention's GARD Guide, ECCC's Environmental Code of Practice for Metal Mines, and applicable provincial or territorial guidance. The study must	A geochemical characterization study describing the spatial and compositional representativeness of samples, the analytical methods used to evaluate geochemical properties (including mineralogy, metal(loid) leaching, and acid generation potential), and the approach used to predict drainage chemistry trends over time, as well as how uncertainties will be addressed as the project advances. Consider relevant guidance, such as Mine Environment Neutral Drainage (MEND) report 1.20.1, International Network for Acid Prevention's GARD Guide, ECCC's Environmental Code of Practice for Metal Mines, and applicable provincial or	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		include a Conceptual Geochemical Model that assesses how project activities and components may affect the quality of surface water, groundwater, and sediment in areas that support fish habitat. This model must include risk-based source terms, integrate geochemical data from relevant materials to predict drainage chemistry and quantify the potential for metal(loid) leaching and acid rock drainage under expected site conditions, especially from sulphidic geological materials,]	territorial guidance. The study must include a Conceptual Geochemical Model that assesses how project activities and components may affect the quality of surface water, groundwater, and sediment in areas that support fish habitat. This model must include risk-based source terms, integrate geochemical data from relevant materials to predict drainage chemistry and quantify the potential for metal(loid) leaching and acid rock drainage under expected site conditions, especially from sulphidic geological materials,]		
142	5.12.1 –Baseline conditions	Maps of nests that will be or have been added to the Abandoned Nest Registry and are being monitored to comply with the Migratory Birds Regulations, 2022 [48]; and	Maps of nests that will be or have been added to the Abandoned Nest Registry and are being monitored to comply with the Migratory Birds Regulations, 2022 [48]; and	OPG maintains its tailoring recommendation. These comments have considerable implications on the scope, including on what information is necessary, proportionate, technically feasible, and appropriate at this stage of the IA process.	OPG notes that this requirement will be met as part of compliance with the Migratory Bird Regulation (MBR) throughout the life of the NNW Project. OPG proposes removing this requirement from the TISG, because abandoned nest registration typically would not be undertaken at this stage of a project given uncertainties with precise project footprints and risk that new nesting areas could be established and abandoned in the intervening years between IA site related studies and start of site preparation.
143	6.0 - Health, social, and economic conditions	The IAA requires the consideration of changes to health, social or economic conditions and the positive and negative consequences of these changes that are likely to be caused by the carrying out of the designated project. The IAA also requires the assessment of adverse effects within federal jurisdiction, including non-negligible adverse changes occurring in Canada to the health, social or economic conditions of Indigenous Peoples.	Title change: Health, social and economic conditions Human Environment	No update.	The MS-WTFN did not identify specific comments on this item.
144	6.0 - Health, social, and economic conditions	The proponent should work with, at minimum, the Town of Cobourg, Municipality of Port Hope, Municipality of	The proponent should consider impacts on work with , at minimum, Northumberland County, Regional	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		Trent Hills, Municipality of Brighton, Township of Hamilton, Township of Alnwick/Haldimand, Township of Cramahe and other self-identifying local communities, as well as local peoples, when fulfilling the requirements of Section 6. The proponent must consider the First Nations and other Indigenous communities outlined in 3.1 of the IEPP when fulfilling the requirements in Section 6 and Section 7.3.2.	Municipality of Durham, City of Kawartha Lakes and Peterborough County / City of Peterborough at a regional level; and, the Municipality of Port Hope, Town of Cobourg, Hamilton Township and the Municipality of Clarington at a local level the Town of Cobourg, Municipality of Port Hope, Municipality of Trent Hills, Municipality of Brighton, Township of Hamilton, Township of Alnwick/Haldimand, Township of Cramahe and other self-identifying local communities, as well as local peoples, when fulfilling the requirements of Section 6. The proponent must consider the First Nations and other Indigenous communities outlined in 3.1 of the IEPP when fulfilling the requirements in Section 6 and Section 7.3.2.		
145	6.1.1 - General baseline conditions	Provide a comparison of data at the provincial, regional or national level, if possible, to better interpret baseline conditions;	Provide a comparison of data at the local, regional , provincial, regional or national level, where relevant and available if possible, to better interpret baseline conditions;	No update.	The MS-WTFN did not identify specific comments on this item.
146	6.2.1 - Baseline for Health Conditions	Describe the current cancer occurrence among local peoples in the region, including cancer rate, type, mix, stage of cancer, age of detection/diagnosis, and lifespan of cancer patient. Include provincial and national information on cancer occurrence, among Indigenous Peoples and local peoples, to put regional information into perspective.	Using available data , describe the current cancer occurrence among local peoples in the region, including cancer rate, type, mix, stage of cancer, age of detection/diagnosis, and lifespan of cancer patient. Include provincial and national information on cancer occurrence, among Indigenous Peoples and local peoples, to put regional information into perspective.	No update.	The MS-WTFN did not identify specific comments on this item.
147	6.2.2 - Effects on health conditions	Problem formulation and screening decisions for the HHRA should be informed by engagement with First Nations and other Indigenous communities and consider Indigenous-	Problem formulation and screening decisions for the HHRA should be informed by engagement with First Nations and other Indigenous communities and consider Indigenous-	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		specific exposure pathways, including harvesting practices, consumption of country foods, use of surface and groundwater, seasonal and mobile use patterns, and intergenerational considerations.	specific exposure pathways, including harvesting practices, consumption of country foods, use of surface and groundwater, seasonal and mobile use patterns, and intergenerational considerations.		
148	6.2.2.1 - Effects on biophysical determinants of health	Describe how the project-related contaminants (as identified in sections 5.3 Topography, soil and sediment, 5.6 Atmospheric, acoustic and visual environment, and 5.7 Groundwater and surface water) can potentially end up in the water, air or soil, can be absorbed in country foods (i.e., foods that are trapped, fished, hunted, harvested or grown for subsistence, cultural or medicinal purposes);	Describe how the applicable project-related contaminants (as identified in sections 5.3 Topography, soil and sediment, 5.6 Atmospheric, acoustic and visual environment, and 5.7 Groundwater and surface water) can potentially end up in the water, air or soil, can be absorbed in country foods (i.e., foods that are trapped, fished, hunted, harvested or grown for subsistence, cultural or medicinal purposes);	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A
149	6.2.2.1 - Effects on biophysical determinants of health	First Nations and other Indigenous communities who have historically used, or identify potential or future use and reconnection priorities within the area of potential effects. This includes Indigenous Peoples who practice traditional ways of life in proximity to the project through any direct or indirect pathways (i.e., hunting, trapping, fishing, harvesting, etc.). This may be reflected in a HHRA.	Rights-holding First Nations and other Indigenous communities who have historically used, or identify potential or future use and reconnection priorities within the area of potential effects. This includes Indigenous Peoples who practice traditional ways of life in proximity to the project through any direct or indirect pathways (i.e., hunting, trapping, fishing, harvesting, etc.). This may be reflected in a HHRA.	No update.	The MS-WTFN did not identify specific comments on this item.
150	6.2.2.1 - Effects on biophysical determinants of health	Address the effects of using radiation weighting factors suggested in CSA N288.6, for calculating a “biota effective dose” from absorbed dose (i.e., weighting factors of 40 for alpha particles, and 3 for tritium beta particles); and,	Address the effects of using radiation weighting factors suggested in CSA N288.6, applicable for human dose for calculating a “biota effective dose” from absorbed dose (i.e., weighting factors of 40 for alpha particles, and 3 for tritium beta particles); and,	No update.	The MS-WTFN did not identify specific comments on this item.
151	6.2.2.1 - Effects on biophysical determinants of health	Use a probabilistic modelling approach if there is ambiguity in the validity of dose estimates for site-specific conditions and/or VCs (i.e., a probabilistic approach	Use a probabilistic modelling approach if the results of the probabilistic modelling are likely to provide a better basis for risk management and decision-making	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		is appropriate when it is necessary to grossly extrapolate information for other areas or species, or when there is ambiguity in the protection of any threatened or endangered species, or species of concern;	than a deterministic risk assessment. An example of where probabilistic modelling may be considered is if there is ambiguity in the validity of dose estimates for site-specific conditions and/or VCs (i.e., a probabilistic approach is appropriate when it is necessary to grossly extrapolate information for other areas or species, or when there is ambiguity in the protection of any threatened or endangered species, or species of concern);		
152	6.2.2.1 - Effects on biophysical determinants of health	Provide an assessment of the carcinogenicity of diesel exhaust when diesel engines are a source of air pollutant emissions for the project.	Provide an assessment of the carcinogenicity of diesel exhaust (with PM2.5 as a surrogate for diesel particulate) when diesel engines are a source of air pollutant emissions for the project.	No update.	The MS-WTFN did not identify specific comments on this item.
153	6.2.2.1 - Effects on biophysical determinants of health	Evaluate the potential risk to human and non-human biota from biocides and other means used to manage biohazards and invasive species; and	Evaluate the potential risk to human and non-human biota from biocides and other means used to manage biohazards and invasive species; and	No update.	The MS-WTFN did not identify specific comments on this item.
154	6.2.2.1 - Effects on biophysical determinants of health	Provide an assessment of the carcinogenicity of diesel exhaust when diesel engines are a source of air pollutant emissions for the project.	Using available data sources, provide an assessment of the carcinogenicity of diesel exhaust (with PM2.5 as a surrogate for diesel particulate) when diesel engines are a source of air pollutant emissions for the project.	No update.	The MS-WTFN did not identify specific comments on this item.
155	6.2.2.2 - Effects on social determinants of health	Describe potential effects of project conditions (e.g., transient employment, high wages, high stress work, coupled with gender-based norms) on community safety, including increased risks of harm from family conflict, sexual exploitation, and gender- and family-based violence, particularly during the construction phase;	Describe potential effects of project conditions (e.g., transient employment, high wages, high stress work, coupled with gender-based norms) on personal and community safety (e.g., including increased risks of harm from family conflict, sexual exploitation, and gender- and family-based violence), particularly during the construction phase;	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
156	6.3.1 - Baseline for social conditions	A brief history of human occupancy and of land resource use in the study area based on selected spatial and temporal boundaries (include maps, if possible), including information on major industries and initiatives in the vicinity of the project site, including the Port Hope Area Initiative;	A brief history of human occupancy (where information is available) and of land resource use in the study area based on selected spatial and temporal boundaries (include maps, if possible), including information on major industries and initiatives in the vicinity of the project site, including the Port Hope Area Initiative;	No update.	The MS-WTFN did not identify specific comments on this item.
157	6.3.1 - Baseline for social conditions	Describe baseline conditions for community well-being and way of life, including:	Describe baseline conditions for those social and economic conditions that contribute to community well-being and way of life, including	No update.	The MS-WTFN did not identify specific comments on this item.
158	6.3.1 - Baseline for social conditions	Relevant protection factors that contribute to community well-being and resilience, including any interactions between these factors (e.g., sense of belonging, cultural continuity, language, family supports);	Relevant protection factors that contribute to community well-being and resilience , including any interactions between these factors (e.g., sense of belonging, cultural continuity, language, family supports);	No update.	The MS-WTFN did not identify specific comments on this item.
159	6.3.1 - Baseline for social conditions	Describe and evaluate the local, regional, First Nation and other Indigenous community, and local community infrastructure and services in the study areas. Evaluations should consider the existing capacity, functionality, and ability of infrastructure and services to meaningfully meet the needs of local peoples:	Describe and evaluate the local, regional, First Nation and other Indigenous community, and local community infrastructure and services in the study areas. If possible , evaluations should consider the existing capacity, functionality, and ability of infrastructure and services to meaningfully meet the needs of local peoples:	No update.	The MS-WTFN did not identify specific comments on this item.
160	6.3.1 - Baseline for social conditions	Capacity of municipal governments and First Nations and other Indigenous communities to collaborate with provincial and federal authorities and to secure funding and support required to upgrade the current regional infrastructure and services; and	Capacity of municipal governments and First Nations and other Indigenous communities to collaborate with provincial and federal authorities and to secure funding and support required to upgrade the current regional infrastructure and services; and	No update.	The MS-WTFN did not identify specific comments on this item.
161	6.3.2.1 - Effects on community well-being and way of life	Document and take into account tolerance thresholds for potential adverse effects identified by First Nations and other Indigenous communities and local communities;	Document and take into account tolerance thresholds for potential adverse effects identified by First Nations and other Indigenous communities and local communities;	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
162	6.3.2.1 - Effects on community well-being and way of life	Describe potential adverse and positive effects, at the community level, of changes to community well-being including, but not limited to:	Describe potential adverse and positive effects, at the community level, of changes to social and economic conditions community well-being including, but not limited to:	No update.	The MS-WTFN did not identify specific comments on this item.
163	6.3.2.1 - Effects on community well-being and way of life	The Impact Statement must: - describe the local and regional economic conditions for First Nations and other Indigenous communities and local communities, including: - ... - local peoples and communities, and First Nations and other Indigenous communities interested in local land uses and resources for previous projects in the regional study area; and	The Impact Statement must: - describe the local and regional economic conditions for First Nations and other Indigenous communities and local communities. - ... - Local peoples and communities, and First Nations and other Indigenous communities interested in local land uses and resources for previous projects in the regional study area; and	No update.	The MS-WTFN did not identify specific comments on this item.
164	6.3.2.2 – Effects on services and infrastructure	Describe the adverse and positive effects to the local and regional services and infrastructure, including their capacity and functionality, anticipating and considering increased demand on these services including those identified under section:	Describe the adverse and positive effects to local and regional services and infrastructure, including their capacity and functionality, anticipating and considering increased demand on these services within defined study areas and using publicly available information and information from engagement , including those identified under section:	No update.	The MS-WTFN did not identify specific comments on this item.
165	6.3.2.2 – Effects on services and infrastructure	Assess potential effects on First Nations and other Indigenous communities' infrastructure, programs, and service delivery capacity, including governance and delivery of community services. This includes identifying any project-driven demands on services (e.g., health, emergency response, housing, community infrastructure, social services, and administrative capacity), estimating incremental costs and resourcing needs, and describing mitigation measures and	Assess potential effects on First Nations and other Indigenous communities' infrastructure, programs, and service delivery capacity, including governance and delivery of community services. This includes identifying any project-driven demands on services (e.g., health, emergency response, housing, community infrastructure, social services, and administrative capacity), based on information shared through engagement and publicly available sources, where applicable ; estimating incremental costs	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position related to the green highlighted portion of this comment.	N/A

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		proposed commitments to avoid, reduce, or address these effects.	and resourcing needs, where information is provided by the Rights-holding First Nations and interested Indigenous communities and permitted for inclusion and describing mitigation measures and proposed commitments to avoid, reduce, or address these effects.		
166	6.3.2.2 - Effects on services and infrastructure	Assess potential effects on First Nations and other Indigenous communities' infrastructure, programs, and service delivery capacity, including governance and delivery of community services. This includes identifying any project-driven demands on services (e.g., health, emergency response, housing, community infrastructure, social services, and administrative capacity), estimating incremental costs and resourcing needs, and describing mitigation measures and proposed commitments to avoid, reduce, or address these effects.	Assess potential effects on First Nations and other Indigenous communities' infrastructure, programs, and service delivery capacity, including governance and delivery of community services. This includes identifying any project-driven demands on services (e.g., health, emergency response, housing, community infrastructure, social services, and administrative capacity), estimating incremental costs and resourcing needs, and describing mitigation measures and proposed commitments to avoid, reduce, or address these effects.	No update.	The MS-WTFN did not identify specific comments on this item.
167	6.4.1 - Baseline for economic conditions	Existing employment rates and economic well-being in the study area and impacted communities;	Existing employment rates and economic well-being in the study area and impacted communities;	No update.	The MS-WTFN did not identify specific comments on this item.
168	6.4.2 - Effects on economic conditions	An estimate of total investment requirements;	An estimate of total investment requirements;	No update.	The MS-WTFN did not identify specific comments on this item.
169	6.4.2 - Effects on economic conditions	A detailed forecast of project revenues, capital and operating costs, including applying sensitivity analyses based on qualitative (e.g., cost overruns, anticipated electricity rates, etc.) and quantitative (e.g., discounted cash-flow analysis or levelized cost of electricity, etc.) factors; and	A detailed forecast of project revenues, capital and operating costs, including applying sensitivity analyses based on qualitative (e.g., cost overruns, anticipated electricity rates, etc.) and quantitative (e.g., discounted cash-flow analysis or levelized cost of electricity, etc.) factors; and Provide an economic effects assessment, supported by economic modelling, that will describe the local, regional, and national economic effects	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
			based on reasonable assumptions for the potential future project.		
170	6.4.2.1 - Effects on employment	Anticipated workplace policies and programs, including hiring policies and programs, employee assistance programs and benefits programs;	If possible , anticipated workplace policies and programs, including hiring policies and programs, employee assistance programs and benefits programs;	No update.	The MS-WTFN did not identify specific comments on this item.
171	6.5 – Mitigation and enhancement measures for health, social and economic conditions	The Impact Statement must: describe the proposed mitigation and enhancement measures for effects on human health, including: how radiation protection measures maintain doses to the public and the environment to a level that is As Low As Reasonably Achievable (ALARA) through the application of Best Available Technology and Techniques Economically Achievable (BATEA);	The Impact Statement must: describe the proposed mitigation and enhancement measures for effects on human health, including: how radiation protection measures reduce maintain doses to the public and the environment to a level that is As Low As Reasonably Achievable (ALARA) through the application of Best Available Technology and Techniques Economically Achievable (BATEA);	No update.	The MS-WTFN did not identify specific comments on this item.
172	6.5 – Mitigation and enhancement measures for health, social and economic conditions	Identification of mitigation and prevention measures to eliminate or minimize the radiological hazards through design and engineering controls;	Identification of Describe various potential mitigation and prevention measures to eliminate or minimize the radiological hazards to workers through design and engineering controls;	No update.	The MS-WTFN did not identify specific comments on this item.
173	6.5 – Mitigation and enhancement measures for health, social and economic conditions	Effects on infrastructure and services; • where applicable, provide documented confirmation from the grid owner(s) that, with appropriate grid and plant mitigation measures in place, the location of the reactor facility will not adversely affect the grid	Effects on infrastructure and services; • where applicable, provide documented confirmation from the grid owner(s) that, with appropriate grid and plant mitigation measures in place, the location of the reactor facility will not adversely affect the grid	No update.	The MS-WTFN did not identify specific comments on this item.
174	7.0 - First Nations and other Indigenous communities	The Impact Statement must demonstrate how impacts on Indigenous Peoples and their rights were considered and assessed, including:	The Impact Statement must demonstrate how impacts on Indigenous Peoples and their rights were considered and assessed or how First Nations and other Indigenous communities' assessment information or outcomes may be brought forward into the Impact Assessment and decision-making phases	OPG is proposing revision to its original recommendation related to the yellow highlighted text, based on MS-WTFNs position. The Impact Statement must demonstrate how impacts on Indigenous Peoples and their rights were considered and assessed; Including, how First Nations and other	OPG's intent was to include information shared by Rights-holding First Nations and Indigenous Communities, including any available/shared information from the MS-WTFN assessment, also recognizing MS-WTFNs have indicated that they will also have a Nation-to-Nation relationship sharing directly within the Crown Impact Assessment.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
			of the impact assessment process , including:	Indigenous communities' assessment information or outcomes may be brought forward into the Impact Assessment and decision-making phases of the impact assessment process, including:	Added "including" First Nations and other Indigenous Communities.
175	7.0 - First Nations and other Indigenous communities	Where requested by First Nations and other Indigenous communities, parts or all of the assessments of effects on Indigenous Peoples and their rights can be combined in the group-specific assessment. For example, effects on the current use of lands, water and Relatives, and resources for traditional purposes and impacts on Indigenous rights to hunt, fish, and trap can be reported together. First Nations and other Indigenous communities may also identify holistic VCs that encompass multiple environmental, health, social, or economic elements. Undertaking these assessments together, when requested, will support consistent conclusions. In all cases, the Impact Statement must demonstrate that all requirements were met.	Where requested by First Nations and other Indigenous communities, parts or all of the assessments of effects on Indigenous Peoples and their rights can be combined in the group-specific assessment. For example, effects on the current use of lands, water and species as well as other aspects that are identified in footnote X Relatives, and resources for traditional purposes and impacts on Indigenous rights to hunt, fish, and trap can be reported together. First Nations and other Indigenous communities may also identify holistic VCs that encompass multiple environmental, health, social, or economic elements. Undertaking these assessments together, when requested, will support consistent conclusions. In all cases, the Impact Statement must demonstrate how all requirements were or will be met through the Impact Assessment process.	<u>Relatives</u> to be replaced with <u>Species as well as other aspects that are identified in footnote X.</u> Footnote X: Species as well as other aspects that are identified in XX (footnote number) including; human and non-human Beings, such as the Land, Air, Waters, and all Animal, Plant, Bird, Fish, and Little Spirit Beings (Relatives). It acknowledges worldviews that hold that all beings are Related and encompasses cultural and spiritual relationships with place.	See OPG response to comment number 2(III) related to the updated term 'Relatives'.
176	7.0 - First Nations and other Indigenous communities	The Impact Statement must contain an assessment for each First Nation and other Indigenous community potentially affected by the project, and summarize any past, present and anticipated future use of, and practices within, the study areas.	The Impact Statement must contain an assessment or must demonstrate how all requirements will be met through the Impact Assessment process for each First Nation and other Indigenous community potentially affected by the project, and summarize any past, present and anticipated future use of, and practices within, the study areas.	No update.	The MS-WTFN did not identify specific comments on this item.
177	7.0 - First Nations and other	The Proponent must work with the First Nations and other Indigenous communities identified in sections 3.1	Here and in other requirements where the Proponent is required to work with the First Nations and other Indigenous	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
	Indigenous communities	and 3.2 of the IEPP in the development of the Impact Statement. As described in the IEPP, the degree of engagement with each community will be contextualized based on the 3.1 and the 3.2 distinction, as well as information provided by each First Nation or Indigenous community regarding potential pathways of impact from the project on their Indigenous or Treaty rights and interests.	communities, add: " Where the First Nations and other Indigenous communities have limited or no participation in the project, provide an explanation. "		
178	7.0 - First Nations and other Indigenous Communities	Protocols and participation in any assessment of physical and cultural heritage, that are being carried out or led by the proponent, including but not limited to archaeological investigations, must be developed in collaboration with First Nations and other Indigenous communities and must abide by provincial standards and standards set by applicable First Nations and other Indigenous communities.	Protocols and participation in any assessment of physical and cultural heritage, that are being carried out or led by the proponent, including but not limited to archaeological investigations, must be developed in collaboration with First Nations and other Indigenous communities and must abide by follow Ministry of Citizenship and Multiculturalism (MCM) provincial standards guidelines and standards including engagement with set by applicable First Nations and other Indigenous communities.	No update.	The MS-WTFN did not identify specific comments on this item.
179	7.0 - First Nations and other Indigenous Communities 7.1.2 Effects to physical and cultural heritage and structures, sites or objects of significance	The Impact Statement must assess effects to physical and cultural heritage, and structures, sites or objects things of historical, archaeological, paleontological or architectural significance based on a comparison with and without the project, including:	The Impact Statement must assess effects to physical and cultural heritage, and structures, sites or objects things of historical, archaeological, paleontological or architectural significance based on a comparison with and without the project, including:	No update.	The MS-WTFN did not identify specific comments on this item.
180	7.2.2 - Effects to current use of lands, waters and Relatives for traditional purposes	The Impact Statement must: assess the effects on current use of lands, waters and Relatives for traditional purposes, based on likely effect pathways and a comparison with and without the project, including changes to:	The Impact Statement must: assess the effects on current use of lands, waters and species as well as other aspects that are identified in footnote X Relatives for traditional purposes, based on likely effect	No update. <i>Relatives</i> to be replaced with <i>Species as well as other aspects that are identified in footnote X.</i> Footnote X: Species as well as other aspects that are identified in XX (footnote number)	See 2(III) See OPG response to comment number 2(III) related to the updated term 'Relatives'.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
			pathways and a comparison with and without the project , including changes to:	including; human and non-human Beings, such as the Land, Air, Waters, and all Animal, Plant, Bird, Fish, and Little Spirit Beings (Relatives). It acknowledges worldviews that hold that all beings are Related and encompasses cultural and spiritual relationships with place.	
181	8.0 - Security Considerations	The Impact Statement must provide a commitment that the SSTR and basis information will be maintained as security baseline characterization data for the lifecycle of the facility.	The Impact Statement must provide a commitment that the SSTR and basis information will be maintained as security baseline characterization data for the lifecycle of the facility.	No update.	The MS-WTFN did not identify specific comments on this item.
182	8.1.1 - Remote Areas	The proponent must evaluate remote sites with respect to the anticipated time required to implement essential response services, including how long it will take offsite armed responders to reach the reactor facility. This aspect of the SSTR should support early identification of the need for establishing an onsite nuclear response force capability, to ensure that a trained response group is in position during the construction phase of possible target sets (such as vital areas) that are part of the reactor facility.	The proponent must evaluate remote sites with respect to the anticipated time required to implement essential response services, including how long it will take offsite armed responders to reach the reactor facility. This aspect of the SSTR should support early identification of the need for establishing an onsite nuclear response force capability, to ensure that a trained response group is in position during the construction phase of possible target sets (such as vital areas) that are part of the reactor facility.	No update.	The MS-WTFN did not identify specific comments on this item.
183	8.2 - Transportation Routes	The Impact Statement proponent must consider the transportation routes in close proximity of the site, to ensure that they are adequately taken into account during future site development activities. IAAC proposes to assess the potential adverse effects of project-related transportation on applicable valued components within a defined geographic scope. This scope will be established at the end of the Planning Phase when these Guidelines are finalized and will focus on transportation activities in close	The Impact Statement proponent must consider the transportation routes in close proximity of the site, to ensure that they are adequately taken into account during future site development activities. IAAC proposes to assess the potential adverse effects of project-related transportation on applicable valued components within a defined geographic scope. This scope will be established at the end of the Planning Phase when these Guidelines are finalized and will focus on transportation activities in close	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		proximity to the project site. The routes to be considered include waterways, land routes and airspace, as described in the following text. For each of the routes in close proximity of the site and associated security measures, as outlined below, the proponent must also consider and describe First Nations and other Indigenous communities' use, harvesting areas and cultural landscapes, and assess potential effects on navigation, access, mobility, and the exercise of rights.	proximity to the project site. The routes to be considered include waterways, land routes and airspace, as described in the following text. For each of the routes in close proximity of the site and associated security measures, as outlined below, the proponent must also consider and describe First Nations and other Indigenous communities' use, harvesting areas and cultural landscapes, and assess potential effects on navigation, access, mobility, and the exercise of rights.		
184	9.1 - Risk Assessment	Engage with First Nations and other Indigenous communities to understand community-identified risks and thresholds for unacceptable harm and describe how these perspectives informed the assessment	Engage with First Nations and other Indigenous communities, as described in Section 3 , to understand community-identified risks and thresholds for unacceptable harm and describe how these perspectives informed the assessment;	No update.	The MS-WTFN did not identify specific comments on this item.
185	9.2 – Emergency Management	Identify emergency planning zones and emergency response for accident and malfunction scenarios, taking into account population density, the transient workforce, seasonal population fluctuations, and population projections for the life cycle of the project;	Identify emergency planning zones and emergency response for accident and malfunction scenarios, taking into account population density, the transient workforce, seasonal population fluctuations, and population projections for the life cycle of the project; The proponent is required to provide certain information about the emergency planning zones. For more information, see Sections 3.3.5 and 4.6.1 of REGDOC-1.1.1.	No update.	The MS-WTFN did not identify specific comments on this item.
186	9.2 – Emergency Management	Take into account evacuation areas in the planning of emergency measures as well as the particularities linked to these areas (e.g., population density, number of residents varying with the seasons, possible high number of individuals unfamiliar with the region, limited communication means in remote areas and with temporary residents);	Take into account evacuation areas in the planning of emergency measures as well as the particularities linked to these areas (e.g., population density, number of residents varying with the seasons, possible high number of individuals unfamiliar with the region, limited communication means in remote areas and with temporary residents);	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
187	9.2 – Emergency Management	Describe any plans for delivering training and exercise programs in local Indigenous languages for potentially affected First Nations and other Indigenous communities.	Describe any plans for delivering training and exercise programs in local Indigenous languages for potentially affected First Nations and other Indigenous communities.	No update.	The MS-WTFN did not identify specific comments on this item.
188	9.2 – Emergency Management	Consider the locations of First Nations and other Indigenous communities, seasonal access conditions, transportation routes, and community-identified safety priorities in emergency planning and evacuation modelling. Describe how engagement with First Nations and other Indigenous communities informed modelling assumptions and response measures, including evacuation, sheltering, and KI-pill distribution strategies.	Consider the locations of First Nations and other Indigenous communities, seasonal access conditions, transportation routes, and community-identified safety priorities in emergency planning and evacuation modelling. Describe how engagement with First Nations and other Indigenous communities informed modelling assumptions and response measures, including evacuation, sheltering, and KI-pill distribution strategies.	No update.	The MS-WTFN did not identify specific comments on this item.
189	9.2 – Emergency Management	Engage with affected First Nations and other Indigenous communities and consider their governance structures, community locations, seasonal access realities, and safety priorities. The Impact Statement must describe how Indigenous input informed evacuation modelling, sheltering strategies, communication approaches, and recovery planning;	Engage with affected First Nations and other Indigenous communities and consider their governance structures, community locations, seasonal access realities, and safety priorities. The Impact Statement must describe how Indigenous input informed evacuation modelling, sheltering strategies, communication approaches, and recovery planning;	No update.	The MS-WTFN did not identify specific comments on this item.
190	9.2 – Emergency Management	Consider culturally safe and trauma-informed approaches, including culturally appropriate communication and support measures developed in collaboration with First Nations and other Indigenous communities;	Consider culturally safe and trauma-informed approaches, including culturally appropriate communication and support measures developed in collaboration with First Nations and other Indigenous communities;	No update.	The MS-WTFN did not identify specific comments on this item.
191	9.2 – Emergency Management	Develop monitoring and follow-up programs for accidents and malfunctions in collaboration with First Nations and other Indigenous communities and include relevant Indigenous-led or co-developed components. The Impact Statement must describe how Indigenous input informed recovery objectives, monitoring indicators, and considerations	Develop monitoring and follow-up programs for accidents and malfunctions in collaboration with First Nations and other Indigenous communities and include relevant Indigenous-led or co-developed components. The Impact Statement must describe how Indigenous input informed recovery objectives, monitoring indicators, and considerations	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		related to the resumption of access to lands and waters;	related to the resumption of access to lands and waters;		
192	9.2 – Emergency Management	Consider, where identified by First Nations and other Indigenous communities, any specific conditions under which lands or waters would be considered safe for renewed use in the development of recovery measures and follow-up programs;	Consider, where identified by First Nations and other Indigenous communities, any specific conditions under which lands or waters would be considered safe for renewed use in the development of recovery measures and follow-up programs;"	No update.	The MS-WTFN did not identify specific comments on this item.
193	9.2 – Emergency Management	- describe emergency communication plans that would provide emergency instructions to surrounding communities, including First Nations and other Indigenous communities, and how these will be informed by the public and First Nations and other Indigenous communities. The proponent should consider the following: - immediate urgent actions, such as notifying the public of security and safety concerns, instructions for on-site shelter or shelter-in-place, procedures and evacuation routes; - longer-term actions, such as a general website and telephone helplines, updates on the status of incidents, injured animal reports; - the contact information for entities (municipal/provincial/federal/other) involved in ongoing long-term monitoring of air quality, water quality, and/or country (traditional) foods (such as fish) and details about such monitoring; - translation to local Indigenous languages; and - the Interim Service Standards for Culturally-Relevant Emergency Management Services of Indigenous Services Canada's Emergency	describe emergency communication plans that would provide emergency instructions to surrounding communities, including First Nations and other Indigenous communities, and how these will be informed by the public and First Nations and other Indigenous communities. The proponent should consider the following: immediate urgent actions, such as notifying the public of security and safety concerns, instructions for on-site shelter or shelter-in-place, procedures and evacuation routes; longer-term actions, such as a general website and telephone helplines, updates on the status of incidents, injured animal reports; the contact information for entities (municipal/provincial/federal/other) involved in ongoing long-term monitoring of air quality, water quality, and/or country (traditional) foods (such as fish) and details about such monitoring; translation to local Indigenous languages; and the Interim Service Standards for Culturally-Relevant Emergency Management Services of Indigenous Services Canada's Emergency	No update.	The MS-WTFN did not identify specific comments on this item.

Comment #	Section Reference	Draft TISG Text	OPG Proposed Updates to Draft TISG Text (May 7, 2026) ¹ (strikethrough indicates suggested text removal; bold suggests proposed new text)	UPDATED: OPG Proposed Updates to Draft TISG Text (June 15, 2026)	Rationale for OPG's Proposed Updates to Draft TISG Text
		Management Assistance Program [62];	Management Assistance Program [62];		
194	9.2 – Emergency Management	Describe liaison, training and continuous education plans linked to emergency preparedness for surrounding communities that may be affected by the consequences of a significant incident, including for First Nations and other Indigenous communities;	Describe liaison, training and continuous education plans the public awareness plans linked to emergency preparedness for surrounding communities that may be affected by the consequences of a significant incident, including for First Nations and other Indigenous communities;	No update.	The MS-WTFN did not identify specific comments on this item.
195	9.2 – Emergency Management	Describe measures to ensure engagement is carried out with First Nations and other Indigenous communities to meet requirements as co-determined with respective First Nations and other Indigenous communities;	Describe measures to ensure engagement is carried out with First Nations and other Indigenous communities to meet requirements as co-determined with respective First Nations and other Indigenous communities;	No update.	The MS-WTFN did not identify specific comments on this item.
196	9.2 – Emergency Management	Describe past, ongoing and planned outreach efforts to ensure the public and First Nations and other Indigenous communities understanding of the risks associated with this type of project (e.g., providing non-technical information, providing information in local languages if requested); and	Describe past, ongoing and planned outreach efforts to ensure the public and First Nations and other Indigenous communities understanding of the risks associated with this type of project (e.g., providing non-technical information, providing information in local languages if requested); and	No update.	The MS-WTFN did not identify specific comments on this item.
197	9.2 – Emergency Management	Describe any waste management plan as it pertains to waste generated during an emergency response.	Describe any waste management plan as it pertains to waste generated during an emergency response.	No update.	The MS-WTFN did not identify specific comments on this item.
198	10.1.2 - Climate change commitments	The proponent is encouraged to keep apprised of updates to the SACC and related technical guides published by ECCC.	The proponent is encouraged to keep apprised of updates to the SACC and related technical guides published by ECCC.	No update.	The MS-WTFN did not identify specific comments on this item.
199	10.2.1 - Extent to which the likely effects of the project contribute to sustainability	Identify the four to six key VCs from section 1.3 Selection of Valued Components relevant to long-term well-being to be included in the sustainability analysis, informed by Indigenous Knowledge and the project context	Identify the four to six key VCs from section 1.3 Selection of Valued Components relevant to long-term well-being to be included in the sustainability analysis, informed by Indigenous Knowledge, as available to the proponent for inclusion in the Impact Statement , and the project context	In the interest of collaboration and relationship building, OPG has accepted the MS-WTFNs position based on engagement with the MS-WTFNs related to the green highlighted portion of this comment.	The MS-WTFN did not identify specific comments on this item.

