

Federal Review Team – Comment Form – draft Integrated Tailored Impact Statement Guidelines and draft Permitting Plan

Deep Geological Repository (DGR) for Canada’s Used Nuclear Fuel Project
Response required by: May 15, 2026

Please submit the completed form by May 10, 2026, via email to NuclearWaste-DechetsNucleaires@iaac-aeic.gc.ca. In order to be posted on the Registry, and to align with the Official Languages Act, IAAC is requiring that your submission be provided in French and English. Please note that this is your opportunity to tailor the draft Integrated Tailored Impact Statement Guidelines.

Department/Agency:	Employment and Social Development Canada (ESDC)		
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Section 1 – Draft Permitting Plan:

1. Confirm that all applicable legislative and regulatory oversight that may apply to the project, under the authority of your department or agency, is accurately listed in the draft Permitting Plan.

Insert response here:

ESDC does not issue licenses or permits for projects. As such, the Draft Permitting Plan is not relevant to ESDC.

2. Indicate whether your department or agency has identified any power that it will be unable to exercise to allow the project to proceed, in whole or in part. For more information, please refer to subsection 17(1) of the IAA.

Insert response here:

ESDC does not exercise powers, nor perform specific duties or functions related to the Project to enable it to proceed. The powers of ESDC Ministers and their duties and functions extend to and include all matters relating to human resources and skills development in Canada. This would include areas of social development in Canada over which Parliament has jurisdiction, and which are not by law assigned to any other Minister, department, board, or agency of the Government of Canada.

ESDC is responsible for monitoring and reporting on a wide range of national macroeconomics and labour market trends (e.g., GDP, unemployment rate), and for providing policy advice on key issues affecting the Canadian economy and workforce.



Section 2 – Draft Integrated Tailored Impact Statement Guidelines:

1. Please review the [draft Integrated Tailored Impact Statement Guidelines](#) (the Integrated Guidelines) sections that are applicable to your department's or agency's mandate.
2. Using the table below, given the context of the project, please provide any comments and include your recommendation for how the final Integrated Guidelines should be adapted to address your comments.
 - Please indicate any corrections, additions or deletions that should be made to the text including considerations of submissions from First Nations and other Indigenous communities that are relevant to your departmental expertise. Please provide a clear context and rationale for your recommendations, including how their implementation would help focus the assessment on, and resolve, key issues relevant to federal decision-making.
 - Federal expert advice should be solution oriented and commensurate to the context of the project. Advice should be informed by risk-based prudence and evidence in the proponent's [Initial Project Description](#), [Summary of Issues](#) (along with supplemental [Consolidated Information on Transportation of Used Fuel – Plain Language](#)), Response to the Summary of Issues, and publicly available information, with a strong reliance on well-understood mitigation measures, existing guidance, and regulatory instruments that will manage effects. Advice should also be informed by a clear understanding of the project and the local biophysical and socio-economic context. In doing so, departments and agencies are encouraged to ensure that information requirements are proportionate, clearly justified, and practicable within the context of the impact assessment process and associated timelines (i.e., GoC 3-year target for nuclear projects). Advice should focus on outcomes and the information necessary to support sound decision-making, while maintaining flexibility in how requirements may be met. Departments and agencies are also encouraged to avoid duplication with existing regulatory instruments and to identify opportunities to streamline the draft Integrated Guidelines, including proposing the removal or consolidation of requirements where effects can be effectively addressed through existing legislative, policy, or permitting frameworks.
3. *Strategic Questions to Inform Advice*
 - *What knowledge/information does your department have in relation to the key issue? Does your department have any ongoing or upcoming relevant studies/initiatives? What information/action might support mitigating/resolving issues? **1. As a federal authority, ESDC provides advice on: social development; learning; skills development; employment; unemployment; underrepresented groups; and; working conditions and workplace relations, including relevant programming with respect to Indigenous Peoples. 2. ESDC does not currently have any specific operational policies or guidance documents regarding this Project. 3. Please refer to the enclosed ESDC Socio-Economic Checklist regarding any information that would support mitigating or resolving issues associated with the Project.***
 - *Do we have a good understanding of the pathways of effects? Which key VCs or pathways of effects are missing? Do we have common ground on what the key issues are? **Please refer to ESDC Socio-Economic Checklist for VCs associated with ESDC's mandate that would be applicable to this Project.***
 - *What federal and provincial tools can be leveraged to resolve issues and avoid duplicating efforts? How can we use existing regulatory frameworks to build confidence in predictions and outcomes? **Please refer to ESDC's jobs skills and training programs (ISET, SPF) that are mentioned in ESDC-02 and ESDC-06 in this section's comment table that could potentially assist in the Project's outcomes.***

Department – Comment ID (e.g., ECCC-01)	Draft Integrated Guidelines Section (and subsection, if available)	Context and Rationale (provide an explanation of your comments)	Recommendation: provide text to be inserted or deleted. Be specific on the location within the draft Integrated Guidelines that the text would be added/deleted.
ESDC - 01	7.3 Social Conditions – 7.3.1 Baseline for social conditions, p.47.	Line 1512 of subsection 7.3.1 asks the proponent to describe the baseline conditions for services and infrastructure associated with the proposed Project but does not request a time frame within which these services are to be provided.	<p>It is recommended that the proponent provide a detailed timeframe for which all baseline conditions for services and infrastructure are to be provided for the proposed Project.</p> <p>The following text is recommended within subsection 7.3.1.: "...describe baseline conditions for services and infrastructure and the timeframe within which they will be provided, including:...".</p>
ESDC - 02	7.3 Social Conditions – 7.3.2 Effects on social conditions, p.48.	Lines 1573 to 1575 of subsection 7.3.2 asks the proponent to describe the interaction between the proposed Project’s workforce and local communities with respect to labour mobility. The proponent, however, is not asked to specify to what extend and the length of time an external workforce would be required for the proposed Project.	<p>It is recommended that the proponent provide the extend and timeframe that an external workforce would be required for the proposed Project.</p> <p>The following text is recommended within lines 1573 to 1574: "... describe, at the community level, the expected interactions and their effects, between the project's construction, operation and maintenance workforce and local communities, businesses and residents and the timeframe within which they will take place;".</p> <p>The following text is recommended within lines 1575 to 1576: "...describe in-and out-migration effects, related to activities in all phases of the project lifecycle, including changes in population and the timeframe within which they will take place;".</p>
ESDC - 03	7.3 Social Conditions – 7.4.1 Baseline for economic conditions, p.49.	Lines 1600 to 1601 of subsection 7.4.1 asks the proponent to describe the main economic activities in the study areas and the extent to which they contribute to the local and regional economies. The proponent, however, is not asked to indicate if any similar projects currently exist or existed in the vicinity of the proposed Project.	<p>It is recommended that the proponent provide in their description of the economic activities in the study area any existing or previously existing projects of a similar nature to that of the proposed Project; this will assist in determining what socio-economic impact the proposed Project will potentially have upon the study areas.</p> <p>The following text is recommended within lines 1600 to 1601: "...main economic activities in the study areas, including existing or previously projects of a similar nature, and the extent to which their activity contributes to the local and regional economies;".</p>
ESDC - 04	7.3 Economic Conditions – 7.4.1 Baseline for	Lines 1614 to 1615 of subsection 7.4.1 asks the proponent to describe the following:"...existing	It is recommended that the proponent specify the types of existing training opportunities that currently exist in the proposed Project’s

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	economic conditions, p.50.	training opportunities to examine gender, Indigenous, and diverse subgroup inequities such as for skilled trades and in wages and qualifications;”. The proponent, however, is not asked to specify the types of training opportunities that are currently available in the proposed Project’s vicinity that would fulfill this requirement.	vicinity that would address any inequalities regarding jobs and skills training. The following text is recommended within lines 1614 to 1615: “... the types of existing training opportunities to examine gender, Indigenous, and diverse subgroup inequities such as for skilled trades and in wages and qualifications;”.
ESDC - 05	7.3 Economic Conditions – 7.4.2.1 Effects on employment, p. 50.	Lines 1630 to 1632 of subsection 7.4.2.1 asks the proponent to provide employment and wage estimates at all phases of the proposed Project. The proponent, however, is not asked to indicate how these estimates would pertain to individual groups impacted by the proposed Project, such as First Nations and Indigenous communities, and how they compare and contrast to other impacted populations.	It is recommended that the proponent provide employment and wage estimates that target specific populations impacted by the proposed Project and how they compare and contrast with each other. The following text is recommended within lines 1630 to 1632: “...an estimate of the direct, indirect and induced employment, including income or wages, at each phase of the project (including an estimate of the full-time equivalent (FTE) employment, and an estimate of full- and part-time employment) and among each population category impacted; ”.
ESDC - 06	7.3 Economic Conditions – 7.4.2.1 Effects on employment, p. 50.	Line 1635 of subsection 7.4.2.1 asks the proponent to provide a description of the skills and education levels associated with each position of the proposed Project. The proponent, however, is not asked to determine if the existing labour force in the Project’s vicinity is sufficiently qualified for those positions and what alternatives it would resort to in order to address this issue.	It is recommended that the proponent determine if the existing labour force in the proposed Project’s vicinity is sufficiently qualified for the skills and education levels required for the proposed Project’s employment positions. The following text is recommended within line 1635: “...a description of skill and education levels required for the positions and if the existing labour force within the Project’s study area is sufficiently qualified for those positions ”.
ESDC - 07	7.3 Economic Conditions – 7.4.2.1 Effects on employment, p. 50.	Lines 1636 to 1637 of subsection 7.4.2.1 asks the proponent to describe anticipated workplace policies and programs relevant to hiring and employee assistance; however, it does not ask the proponent to ensure that such policies and programs accurately reflect the communities the proposed Project will impact.	It is recommended that the proponent ensure that all anticipated workplace policies and programs relevant to hiring and employee assistance accurately reflect the communities the proposed Project will impact. The following text is recommended within lines 1636 to 1637: “...anticipated workplace policies and programs, including hiring policies and programs, employee assistance programs

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			and benefits programs that accurately reflect the communities the proposed Project will impact; ".
ESDC - 08	7.3 Economic Conditions – 7.4.2.1 Effects on employment, p. 50.	Line 1642 of subsection 7.4.2.1 asks the proponent to provide an analysis of potential labour shortages associated with the proposed Project; however, the proponent is not asked to provide any alternative solutions to address any potential labour shortages associated with the proposed Project.	It is recommended that the proponent provide in addition to an analysis of potential labour shortages associated with the proposed Project alternative solutions that address those shortages. The following text is recommended within line 1642: "... an analysis of the potential for labour shortages in relevant sectors as a result of the project and alternative solutions that would accurately address those potential shortages; ".
ESDC – 09	7.3 Economic Conditions – 7.4.2.1 Effects on employment, p. 51.	Line 1645 of subsection 7.4.2.1 asks the proponent to outline situations where the project could potentially cause the displacement of local workers; however, the proponent is not asked to provide any alternative solutions that would address such displacement.	It is recommended that the proponent provide in addition to an outline of situations where the proposed Project could cause the displacement of local workers, alternative solutions that would address such displacements. The following text is recommended within line 1645: "...situations where the project may cause the displacement of local workers and alternative solutions that would address these displacements; ".
ESDC - 10	7.3 Economic Conditions – 7.4.2.1 Effects on employment, p. 51.	Lines 1648 to 1650 of subsection 7.4.2.1 asks the proponent to describe the expected investments in training and skills development opportunities associated with the proposed Project, including those that assists Indigenous Nations and communities. The proponent could also be asked to specify what existing and future Government of Canada job and skills training programs they may access that would assist First Nations and communities impacted by the proposed Project.	It is recommended that the proponent refer to existing and future Government of Canada job and skills training programs when describing their anticipated investments in training and skills development opportunities associated with the proposed Project. The following text is recommended within lines 1648 to 1650: "...describe expected investments in training and skills development opportunities, including training and funding programs required to improve employment opportunities for local peoples and Indigenous Nations and communities, in particular those offered by the Government of Canada. "
ESDC - 11	7.3 Economic Conditions – 7.4.2.2 Effects on economies and economic	Lines 1657 to 1695 asks the proponent to describe the proposed Project's effects on the economies and economic participation of its impacted	It is recommended that the proponent provide an analysis of existing or previously existing similar projects in the proposed Project's vicinity when determining the proposed Project's economic effects.

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	participation, p. 51.	communities. The proponent however is not specifically asked to provide an analysis of existing or previously existing similar projects in the proposed Project’s study area; this would facilitate a better understanding of the potential economic effects that the proposed Project would have and would assist in addressing all concerns raised in this section of the draft Integrated TISG.	The following text is recommended within lines 1657 to 1695: “...provide a detailed analysis of existing or previously existing projects of a similar nature in the Project’s study area”.
ESDC - 12	8.3 Health, social and economic conditions of Indigenous Peoples – 8.2.3 Baseline conditions, p.59.	Lines 1916 to 1917 asks the proponent to identify and describe the baseline conditions or value components relevant to the proposed Project that concern First Nations and Indigenous communities. The proponent however is not asked to take into consideration how the baseline conditions relevant to the proposed Project may not uniformly impact First Nations and Indigenous communities; specific value components may vary in degrees of importance among First Nations and Indigenous peoples impacted by the proposed Project.	It is recommended that the proponent take into consideration how the baseline conditions associated with the proposed Project will impact First Nations and Indigenous communities individually when identifying and describing the Project’s value components. The following text is recommended within lines 1916 to 1918: “...The Impact Statement must identify and describe the following components identified by Indigenous Nations and communities: valued components or health, social or economic concerns relevant to the project identified by each Indigenous Nation or community and to the extent upon which they impact those communities and in comparison to others; ”.

Insert as many rows as applicable