

## Standard Issues

There are many ways an environmental impact statement can be structured and this EIS identifies these key elements universally accepted as important considerations as well as some unique to this one:

- vi) [this option] is consistent with international best practices.
- I-21 The EA is a forward looking planning tool. ... This approach is consistent with Principle 15 of the 1992 Rio Declaration on Environment and Development and the Canadian government's framework for applying precaution in decision-making processes.
- Throughout the EA, the DGR Project has been conservatively considered in a thorough and traceable manner.
- A further precautionary feature incorporated into the assessment method is that the evaluation of potential effects is based on changes to the existing environment and not solely on regulatory compliance.
- I-21 The EA considers both western science and traditional and local knowledge, where that information is available.
- This examination identified a range of interests raised by Aboriginal communities that can be used to focus the current EA relative to the potential effects on residents or the Aboriginal communities in proximity of the DGR Project. Throughout this EIS, it is highlighted where Aboriginal traditional knowledge and traditional ecological knowledge was available, and has influenced this assessment.
- I-21 Interaction of various components of the environment are considered through indirect effects throughout this assessment. The extent to which biological diversity may be affected by the DGR Project is considered throughout the assessment of ecological features of the environment (e.g., Lake Huron) in **Section 7.12**.

Any or all of these component elements are both a welcome addition and a transparent approach in addressing the problems of nuclear wastes. However, this EIS appears to be ambiguous in its acceptance of these critical values, such as, for example:

- I-16/17 Use of proposed standards for evaluating the effects in an EIS does not necessarily constitute a commitment to comply with those standards, should they not come into force. The DGR Project will comply with regulatory requirements in effect at the time of licensing, for the jurisdiction in which it is licensed..
- I-18 The Macomb County Water Board and Michigan State do not have regulatory jurisdiction in Canada or the Province of Ontario. Finally, neither the Michigan Act 204 nor its resolutions have been endorsed by authorities in Canada.
- 2-18 "Is the proposed DGR the best site?", and "What other sites have been considered?" were two questions asked by the Saugeen Ojibwa Nation
- 2-78 Did OPG consider other sites for the DGR? Experience in other countries has shown that success in siting a waste disposal facility is greatly improved in situations where the community supports the proposal. ... No other sites volunteered to participate in the feasibility studies or to host the facility. (**Section 3.4.2**)

Will this EIS adhere to these universally accepted standards and embody them in developing this nuclear waste repository instead of the narrower ones such as those identified in I-16/17?