



CMD 26-H100.5

Date: 2026-06-17

**Written Submission from
Catherine Vakil, M.D. on behalf
of the International Physicians for
the Prevention of Nuclear War
Canada**

**Mémoire de
Catherine Vakil, M.D. au nom de
l'Association médicale pour la
prévention de la guerre nucléaire
Canada**

In the matter of the

À l'égard des

Canadian Nuclear Laboratories

Laboratoires Nucléaires Canadiens

Application to amend the licence and
licensing basis for the Gentilly-1 Waste
Facility

Demande concernant la modification de
leur permis et du fondement
d'autorisation pour l'installation de
gestion des déchets de Gentilly-1

**Hearing in writing based on written
submissions**

**Audience par écrit fondée sur des
mémoires**

July 2026

Juillet 2026



International Physicians for the Prevention of Nuclear War Canada

We are committed to the abolition of nuclear weapons, the prevention of war, the promotion of non-violent means of conflict resolution and social justice in a sustainable world.

Comments on “Canadian Nuclear Laboratories’ Request to Amend the Licence and Licensing Basis for the Gentilly-1 Waste Facility”, CMD 26-H100

Submitted by Catherine Vakil MD, on behalf of International Physicians for the Prevention of Nuclear War Canada

International Physicians for the Prevention of Nuclear War (IPPNW) is a physicians’ group committed to the abolition of nuclear weapons, the prevention of war and the promotion of non-violent conflict resolution, and recognizes the link between nuclear power and nuclear weapons. IPPNWC is the Canadian chapter.

Canadian Nuclear Laboratories (CNL) is requesting that the Canadian Nuclear Safety Commission (CNSC) amend the licence and licensing basis for Gentilly-1 Waste Facility. This document is a submission for public comments regarding this request with a description of concerns and recommendations.

Recommendations

IPPNWC is an organization of physicians. It is through a public health lens that we concern ourselves with the issue of nuclear power, and therefore this is the basis for the following recommendations:

1. That an in-person, oral hearing, instead of a hearing in writing only, be conducted on Canadian Nuclear Laboratories’ application to amend the licence and licensing basis for the Gentilly-1 Waste Facility.
2. That the deadline be extended to allow enough time for the public to prepare and submit comments on the documents, including the seven documents posted on April 23, 2026, which total 654 pages.



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3. That the Commission reject Canadian Nuclear Laboratories' request that the public be denied access to the entire content of the Preliminary Hazard Analysis, the Bounding Accident Analysis, and the Safety Analysis Report for the Gentilly-1 Waste Facility.
4. That the full text of CNSC Staff submission CMD 26-H100 be made available in French, and the June 17, 2026 comment deadline for the licence amendment request be extended to enable public participation by francophones.
5. That impacts of transport and storage of the waste be considered by consulting communities along the route of radioactive waste from the plant, and by consulting First Nations on whose traditional territory this hazardous waste would be stored.
6. That a complete, detailed and independent public health assessment be done analyzing the health effects of this project, from decommission to storage.

Each of these recommendations will now be described in more detail.

- 1. That an in-person, oral hearing, instead of a hearing in writing only, be conducted on Canadian Nuclear Laboratories' application to amend the licence and licensing basis for the Gentilly-1 Waste Facility.**

The hearing scheduled for Jul. 26, 2026 is a hearing exclusively in writing, where the public is not invited to express their ideas in person. The legality of this is questionable.



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Hearings in person provide a forum where the public has an opportunity (albeit for only ten minutes) to express their views and to have their questions answered in person. A hearing only in writing prevents meaningful public participation and calls into question the transparency and accountability of the CNSC.

- 2. That the deadline be extended to allow enough time for the public to prepare and submit comments on the documents, including the seven documents posted on April 23, 2026, which total 654 pages.**

Seven documents were posted on April 23, 2026 for the public to read and comment on by Jun. 17, 2026. These documents are long (they total 654 pages), allowing members of the public insufficient time to analyze and prepare succinct and comprehensive feedback. These documents include plans for environmental protection and detailed decommissioning plans, which are extremely important in the decision about licensing. The CNSC should have posted them earlier, and because they did not, the deadline for comments should be significantly later than Jun. 17, 2026.

- 3. That the Commission reject Canadian Nuclear Laboratories' request that the public be denied access to the entire content of the Preliminary Hazard Analysis, the Bounding Accident Analysis, and the Safety Analysis Report for the Gentilly-1 Waste Facility.**

The CNL has requested that the above documents be confidential, meaning that the public would not have access to them. It is obvious that the issues discussed in these



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documents would have significant implications for human and environmental health. Health and safety are of paramount importance. Denying public access to crucial documents that would include descriptions of radiation doses and accident analyses of this project would breach the CNSC's mandate:

“Our mandate, vision, mission and values reflect a commitment to nuclear safety, transparency and public trust.” (<https://www.cnsccsn.gc.ca/eng/about-us/mandate/>).

The CNSC staff has recommended to the commissioners that CNL's request for confidentiality be granted, agreeing that their reasons, largely described as “technical”, are reasonable. We disagree with this in principle and insist that these important documents about health and safety be publicly available.

- 4. That the full text of CNSC Staff submission CMD 26-H100 be made available in French, and the Jun. 17, 2026 comment deadline for the licence amendment request be extended to enable public participation by francophones.**

It is astonishing that the document is not provided in both of Canada's official languages. This should be immediately rectified and the deadline extended to allow those who wish to express themselves in French to do so.

- 5. That impacts of transport and storage of the waste be considered by consulting communities along the route of radioactive waste from the plant, and by consulting First Nations on whose traditional territory this hazardous waste would be stored.**



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There is no permanent place to deposit intermediate level and non-fuel high level nuclear waste in Canada, which is what the contents of decommissioning will require. During 2025 the CNL transported used fuel from Gentilly-1 to a temporary site at Chalk River Laboratories over public roads without public knowledge which is a betrayal of trust by the CNL and the CNSC. Moving this waste twice, from the Gentilly-1 site to a temporary storage area, and then to a permanent site (which does not yet exist) is expensive and dangerous. The waste should be left in storage at the Gentilly-1 site. Any transportation of nuclear waste should be part of the decommissioning plan and environmental assessment.

- 6. That a complete, detailed and independent public health assessment be done analyzing the health effects of this project, from decommission to storage.** This should include public health assessments by all the jurisdictions that have the legal responsibility to protect public health. In this setting, this should include the Ministries of Health in Ontario and Quebec, relevant First Nations and the Public Health Agency of Canada. The assessment should be formal and transparent, should engage in a meaningful way the populations that will be affected, and should contrast the needs of protecting the public's health against the needs of the nuclear industry to dispose of toxic radioactive waste which is a public health threat forever.

Please see Appendix 1 below, which is the submission by International Physicians for the Prevention of Nuclear War Canada (IPPNWC) on the possible environmental and health



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effects of the decommissioning of the Gentilly-1 Waste Facility, submitted Feb. 5, 2026. It expresses more of IPPNWC's concerns about decommissioning of the Gentilly-1 reactor, with a focus on public health. Previous messages sent to the IAAC and Canadian Nuclear Safety Commission regarding the Gentilly-1 assessment were not posted publicly, despite requests to do so. We wish that our document be on the public record, so have appended it here.

Catherine Vakil MD

Appendix 1

Decommissioning of the Gentilly-1 Waste Facility – Environmental Effects Review

Reference #90092

Comments from International Physicians for the Prevention of Nuclear War Canada

Prepared by Catherine Vakil MD, Feb. 5, 2026

International Physicians for the Prevention of Nuclear War (IPPNW) is a physicians' group committed to the abolition of nuclear weapons, the prevention of war and the promotion of non-violent conflict resolution, and recognizes the link between nuclear power and nuclear weapons.

IPPNWC (the Canadian affiliate of IPPNW) is writing to comment on the possible environmental and health effects of the decommissioning of the Gentilly-1 Waste Facility. This is the first time Canada has ever decommissioned a CANDU nuclear reactor and therefore this deserves the utmost attention and scrutiny. The federal authorities are to make a determination as to whether this project is likely to cause significant adverse



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environmental effects. The federal authorities are inviting the public to provide their concerns and opinions regarding this determination.

Dismantling a defunct reactor creates hazards for nuclear workers who risk significant exposure to radioactive dust. There is a risk of contamination of the St. Lawrence River and adjacent land. The reactor core is considered to be mostly intermediate level radioactive waste along with the soil underneath the reactor. This will need to be stored for hundreds of thousands of years, isolated from the environment.

The decommissioning of Gentilly-1 will be the first time Canada has ever conducted dismantling of a CANDU reactor so it is without precedent. As with most first of a kind experiences, mistakes will be made and therefore this should proceed with great caution.

Because the decommissioning involves intermediate level radioactive waste which is extremely hazardous, and because Canadian nuclear experts have never before dismantled a CANDU reactor, a formal panel review should be established to assess the risks to nuclear workers, the environment (including the St. Lawrence River) and the public.

Gentilly-1 is next to Gentilly-2 and both are on Quebec land despite being federally owned. For this reason it would be prudent for the panel review to be jointly federal and provincial (with the participation of BAPE, the Bureau d'audiences publiques sur l'environnement).

It is of paramount importance that all stages of decision-making regarding this decommissioning be transparent, and should include public input at every stage. The used fuel bundles from Gentilly-1 were, without public knowledge, transported on public roads from the reactor site near Montreal to Chalk River Laboratories in Ontario during 2025 without appropriate Impact Assessment authorization. There should have been a request for public input on transporting such hazardous cargo along public roads, from residents who live along all transportation routes, as well as the public in general, who use those routes. This shows a shocking disregard for safety protocol and respect for public concerns and rights of Indigenous Peoples.

In addition there is no facility for storing high level nuclear waste at Chalk River. Moving this waste from Gentilly-1 site to Chalk River for apparently no reason posed unnecessary risks to nuclear workers and the public, and is extremely expensive.



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The decommissioned parts of the Gentilly-1 reactor should remain at the site next to Gentilly-2, which will have to be decommissioned at some point in time and it makes sense to deal with both at that time. There is no storage facility in Canada for intermediate level nuclear waste so leaving the decommissioned reactor on site should be considered. There would be no benefit to move it to another site, and would cause unnecessary risk and expense.

There should be a complete inventory of all radionuclides of each component of the decommissioning, in order to be able to protect the health of workers. Also the radionuclides would be documented and available to the public, which is especially important for protection of the health of future generations.

The decommissioning will be extremely expensive and will be paid for by Canadian taxpayers. Therefore there should be full transparency and accountability to them at every stage.

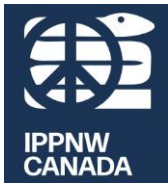
Recommendations

IPPNWC is an organization of physicians. It is through a public health lens that we concern ourselves with the issue of nuclear power, and therefore this is the basis for the following recommendations:

There should be a full panel review to assess the risks of decommissioning of Gentilly-1 (Reference #90092), to nuclear workers, the public and the environment. This panel review should be jointly federal and provincial.

There should be the immediate release of the environmental effects report ("Environmental Effects Review for Gentilly-1 Waste Facility – Phase 3 Decommissioning") once complete.

The decommissioned reactor parts should be stored in a facility for intermediate level nuclear waste on the reactor site next to Gentilly-2.



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Impacts of transport and disposal of the waste should be included in the assessment, including by consulting communities along the route of radioactive waste from the plant, and by consulting First Nations on whose traditional territory this hazardous waste would be stored.

There should be a complete inventory of all radionuclides in the decommissioned parts and it should be publicly available.

There should be complete transparency of all decisions, with public input at every stage of the decommissioning.