



CMD 26-H100.9A

Date: 2026-09-28

Supplementary Information

Renseignements supplémentaires

**Written Submission from the
Sierra Club Canada Foundation
and TerraHumana Solutions**

**Mémoire de la
Fondation Sierra Club Canada
et TerraHumana Solutions**

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



Additional Comments for the Decommissioning of the G1WF

Submitted via email to interventions@cnscccsn.gc.ca

September 28th, 2026

TerraHumana Solutions and the Sierra Club Canada Foundation are intervenors in the CNSC hearing on Canadian Nuclear Laboratories' application to amend the licence for the Gentilly-1 Waste Facility. The present submission was written after the deadline for interventions was extended until September 28th, 2026.

We would first like to reiterate the findings of our initial submission. The licensing decision must adhere to the precautionary principle in order to protect the public, the environment, and local flora and fauna from harm. Furthermore, Indigenous rights, including the right to free, prior, and informed consent for W8banaki Nation, Kebaowek First Nation, the Algonquins of Pikwakanagan First Nation, and Peskotomuhkati Nation, must be respected.

However, the primary reason for our present submission is to support the concerns of the Concerned Citizens of Renfrew County and Area (CCRCA) and the Canadian Coalition for Nuclear Responsibility (CCNR) in regard to the appointment of Dr. Marcel Lacroix as the sole panel member for the licensing decision.

We are aware that the CCNR questions aspects of Dr. Lacroix's Curriculum Vitae. An online search confirms that Dr. Lacroix is listed as a translator for *Thermodynamique, une approche pragmatique*, rather than an author. If this, and other achievements of Dr. Lacroix's, are found to have been embellished, his integrity and credibility as a trustworthy decision-maker for the G1WF licensing is damaged. In addition, if, as Concerned Citizens of Renfrew County Association argue, Dr. Lacroix views his role as one of 'licensing' rather than 'regulating' nuclear activities, Dr. Lacroix's ability to make decisions that prioritize the safety and wellbeing of the public and the environment is in doubt.

If the Canadian Nuclear Safety Commission is truly "[committed to protecting the environment and ensuring nuclear safety and security for all people in Canada](#)," decision-makers must be qualified and trustworthy, exhibiting sound judgment and objectivity, and Indigenous concerns must be addressed before a project proceeds.

Respectfully,

TerraHumana Solutions and the Sierra Club Canada Foundation