

October 31, 2022

Hon. Justin Trudeau
Prime Minister of Canada

Hon. Jonathan Wilkinson
Minister of Natural Resources

Dear Sirs:

Re. **Government of Canada Role in Developing the Radioactive Waste Management Strategy Including Direct Engagement with Canadians and Indigenous Peoples**

On February 8, 2021, 100 civil society organizations wrote to you expressing our expectations that the review of Canada's Radioactive Waste Policy would be carried out with full public engagement and in a manner that would ensure the public interest is fully considered. We also shared our strong concern and disagreement with NRCan's decision to ask the Nuclear Waste Management Organization (NWMO) to lead the development of an “integrated strategy for radioactive waste”.

Our concern was that the NWMO – a body created by the nuclear industry – would create a strategy that was not in the best interests of Canadians. With the release of the NWMO's draft strategy in September, our fears were realized. This proposed strategy has many shortcomings in that it completely ignores the management of certain types of waste:

- Excludes all previously proposed but unapproved projects that the public opposes (e.g., the near-surface disposal facility at Chalk River, nuclear reactor burial).
- Excludes high-level fuel waste (HLW), the largest sources of radioactivity
- Excludes uranium mine waste, the largest volume of radioactive waste.
- Excludes waste arising from clean-up of sites contaminated by past federal nuclear research.
- Is almost entirely focused on waste “disposal”, ignoring issues related to earlier stages of waste management such as:
 - security of existing wet and dry HLW storage facilities,
 - problematic waste types created by proposed “small modular reactors” (SMRs),
 - reliable and detailed waste inventories and characterization
 - decommissioning of existing reactors and proposed SMRs, including issues of timing and methodology, and
 - proposals to “reprocess” HLW to extract plutonium.
- Overly generalizes its depiction of input to obscure the different viewpoints expressed by those who participated in the NWMO exercise.

To summarize, the NWMO's draft strongly reflects the self-interest of the nuclear industry, side-stepping controversial issues and downplaying the economic, social and environmental costs of managing radioactive waste. An honest accounting of these issues and costs is essential so that decision-makers can act in the best interests of Canadians on this matter.

The undersigned 83 groups urge you to ensure that radioactive waste strategies are established subsequent to a new policy on radioactive waste and decommissioning and are developed with the full engagement of the Canadian public and Indigenous peoples.

As the record shows and your staff will attest, civil society participated extensively in the Natural Resources Canada review of Canada's radioactive waste policy, engaging in all opportunities for public input and providing extensive written comments throughout and on the draft policy.

In contrast, we did not engage in the Nuclear Waste Management Organization exercise, for reasons clearly set out in previous correspondence, including that:

- The industry in general and the NWMO in particular is in a conflict of interest with respect to the establishment of radioactive waste policy and strategies; the NWMO immediately expressed their conflict of interest by excluding nuclear fuel waste from the strategy development (notably the only category of waste which is within their legal mandate to make recommendations on)
- As an industry organization, it is inappropriate for the NWMO to be standing in for government as the lead in the exercise to develop a strategy for radioactive waste; as you will know, the International Atomic Energy Agency's Integrated Regulatory Review Service recommended that "the Government should enhance the existing policy and establish the associated strategy..."; they did not recommend that the industry should develop the strategy
- The Nuclear Waste Management Organization was created by the owners and generators of nuclear fuel waste further to the Nuclear Fuel Waste Act (2002); as such, the NWMO has no legal mandate to be working outside their legislated tasks related to the long-term management of nuclear fuel waste
- The NWMO exercise was launched and is now nearing completion prior to the radioactive waste policy being in place; strategy should follow policy, not the other way around

In our 2021 letter, we set out our expectations for the review of Canada's radioactive waste policies and the development of radioactive waste management strategies. We will not restate those now, but we wish to emphasize that in his charge to the Nuclear Waste Management Organization in November 2020, Minister O'Regan was clear that the product of the NWMO's exercise was to be provided to the Minister of Natural Resources for his review and consideration. **We fully understand and accept industry having input into Canada's radioactive waste management strategy; we fully reject any notion that industry determines the strategy. That is the work of Government.**

We write today to ask that you take steps to ensure that the establishment of radioactive waste strategies are made subsequent to having a sound policy on radioactive waste and decommissioning in place, and with the full engagement of the Canadian public and Indigenous peoples with the Government of Canada.

To do less would be a rejection of the IAEA recommendations and a disservice to current and future generations.

Finally, we request a meeting. Please include in your reply an invitation to meet with the steering committee to discuss the next steps in the development of the radioactive waste strategy.

Thank you for your consideration. We await your reply with positive expectations.

Sincerely,

Dr. Gordon Edwards, Canadian Coalition for Nuclear Responsibility
 Theresa McClenaghan, Canadian Environmental Law Association
 Dr. Susan O'Donnell, Coalition for Responsible Energy Development in New Brunswick
 Dr. Ole Hendrickson, Concerned Citizens of Renfrew County and Area
 Michael Poellet, Inter-Church Uranium Committee (ICUC)
 Brennain Lloyd, Northwatch
 Ginette Charbonneau, Ralliement contre la pollution radioactive

Please direct reply correspondence to nuclearwastewatch@gmail.com for distribution to the signators and endorsers.

cc. John Hannaford, Deputy Minister, Natural Resources Canada
 Mollie Johnson, Associate Deputy Minister, Natural Resources Canada
 Jim Delaney, Director, Uranium and Radioactive Waste Division, Natural Resources Canada
 Members of Federal Cabinet and Federal Critics

Endorsed by the following groups:

Action Climat Outaouais (ACO)	QC
Action environnement Basses-Laurentides	QC
AREQ	QC
Association canadienne des médecins pour l'environnement	QC
Association québécoise de lutte contre la pollution atmosphérique (AQLPA)	QC
Avalon Chapter Council of Canadians	NFLD
Bonnechere River Watershed Project	ON
Canadian Coalition for Nuclear Responsibility	QC
Canadian Environmental Law Association	ON
Citizen of Earth	ON
Citizens Against Radioactive Neighbourhoods	ON
Citizens Environment Alliance	ON
Citizens in Action	QC
Citizens' Network on Waste Management	ON
Citoyens au Courant (Vaudreuil-Soulanges)	QC
Coalition for Responsible Energy Development in New Brunswick	NB
Coalition Verte - Green Coalition	QC
Concerned Citizens of Manitoba	MB
Concerned Citizens of Renfrew County and Area	ON
Concerned Citizens of Saint John	NB
Council of Canadians	ON
Council of Canadians Avalon Chapter	NFLD
Council of Canadians Fredericton Chapter	NB
Council of Canadians Ottawa chapter	ON
CUSP - Citizens United for a Sustainable Planet	ON
David Suzuki Foundation	BC
Des Artistes pour la Paix	QC
Durham Nuclear Awareness	ON
Eau Secours	QC
Edmonton Small Press Association	AB

Environment North	ON
Environmental Defence	ON
First United Church Ottawa WaterCare Allies	ON
Friends of the Earth Canada	ON
Grand Riverkeeper Labrador, Inc.	NFLD
Greenspace Alliance of Canada's Capital	ON
Inter-Church Uranium Committee Educational Cooperative	SK
International Physicians for the Prevention of Nuclear War Canada	BC
Kebaowek First Nation	QC
Kitchener Waterloo Chapter, Council of Canadians	ON
Kitchissippi-Ottawa Valley Chapter - Council of Canadians	ON
Le regroupement des citoyens de Saraguay inc.	QC
Leap4wards Saint John	NB
Mobilisation Environnement Ahuntsic-Cartierville	QC
Mouvement d'éducation populaire et d'action communautaire du Québec	QC
Mouvement Vert Mauricie	QC
MySeatoSky	BC
National Council of Women of Canada	ON
Nipissing Environmental Watch	ON
No Nuclear Waste in Northwestern Ontario	ON
North Bay Peace Alliance	ON
Northwatch	ON
Nova Scotia Voice of Women for Peace	NS
Nuclear Free Thunder Bay	ON
Nuke Responsibility	ON
Old Fort William Cottagers Association (OFWCA)	QC
Ontario Clean Air Alliance	ON
Ontario Nature	ON
Peteborough Pollinators	ON
Planetary Association for Clean Energy, Inc.	ON
Pontiac Environment Protection	QC
Port Hope Community Health Concerns Committee	ON
Prevent Cancer Now	ON
Protect Our Waterways - No DGR	ON
Protect Our Waterways - No DGR	ON
Ralliement contre la pollution radioactive	QC
RAVEN (Rural Action and Voices for the Environment) at University of New Brunswick	NB
Regroupement des organismes environnementaux en énergie (ROÉÉ)	QC
Regroupement Vigilance Hydrocarbures Québec	QC
Sanctuaire Notre-Dame-du-Cap	QC
Sanctuaire Notre-Dame-du-Cap	QC
Société pour vaincre la pollution	QC
SOS Great Lakes	ON
Sunset Country Spirit Alliance	ON
Sustainable Development Association	QC
Temiskaming Environmental Action Committee	ON
TerraVie	QC
The Coalition for a Clean Green Saskatchewan	SK

The Provincial Council of Women of Ontario	ON
Toronto Raging Grannies	ON
Unifor Québec	QC
Wolastoq Grand Council	NB
Women of Diverse Origins	QC