

Canada Needs a National Radioactive Waste Policy

May 15, 2020

The Honourable Seamus O'Regan
Minister of Natural Resources
House of Commons
Ottawa, Ontario K1A 0A6

Sent by email

Dear Minister O'Regan:

Re: Canada Needs a National Radioactive Waste Policy

We write to you today to express our strong support for the development of comprehensive policies and strategies for the long-term management of radioactive waste in Canada that will protect the environment and current and future generations of Canadians. We urge that these policies and strategies be developed transparently and that they be based on meaningful consultation with the public and Indigenous peoples. The undersigned groups wish to be considered stakeholders in any consultations your department undertakes during the policy development process.

Furthermore, we urge you to instruct the Canadian Nuclear Safety Commission (CNSC) to cease its development of radioactive waste management and nuclear decommissioning regulatory documents until the necessary overarching policies and strategies are in place. We also urge you to instruct the CNSC to pause consideration of any current or active applications involving radioactive waste disposition and decommissioning, and pause its acceptance of new radioactive waste proposals. These requests and the reasons for them are further elaborated below.

International Review of Canadian Radioactive Waste Policy in 2019

Between September 3rd and 13th, 2019 the International Atomic Energy Agency's Integrated Regulatory Review Service, Department of Nuclear Safety and Security visited Canada and subsequently provided the report of its Mission to Canada. The Mission observed, among other things, that:

“Observation: The Canadian Radioactive Waste Management Policy Framework presents the overall principles for radioactive waste management. However, this does not encompass all the needed policy elements nor a detailed strategy or corresponding arrangements that provide a strategy for radioactive waste management in Canada.”

The resulting recommendation from the Mission, R1 stated as follows:

“Recommendation: The Government should enhance the existing policy and establish the associated strategy to give effect to the principles stated in the Canadian Radioactive Waste Management Policy Framework.”

Canada stated in response as follows:

“Canada’s response

Accepted. [Canada's Radioactive Waste Policy Framework](#) provides the overall principles for radioactive waste management and is supported by three pieces of legislation that govern the management of radioactive waste in Canada:

- The *Nuclear Safety and Control Act*, which sets out the CNSC’s mandate, responsibilities and powers;
- The *Nuclear Fuel Waste Act*, which provides the framework for progress on a long-term strategy for the management of nuclear fuel waste; and
- The *Impact Assessment Act* (and previously, the *Canadian Environmental Assessment Act*, 2012), which, while not being specific to radioactive waste management, establishes the legislative basis for the federal impact assessment process.

The Policy Framework clearly defines the role of government, and waste producers and owners. The government has the responsibility to develop policy, to regulate, to oversee producers and owners to ensure that they comply with legal requirements and meet their funding and operational responsibilities in accordance with approved waste disposal plans. It also makes clear that waste producers and owners are responsible, in accordance with the principle of “the polluter pays”, for the funding, organization, management and operation of disposal and other facilities required for their wastes.

Natural Resources Canada will review its existing policy for radioactive waste, and consider how it may be enhanced to give effect to the principles stated in the Radioactive Waste Policy Framework, including the establishment of an associated strategy” (italics added for emphasis)

We write to request that you advise the undersigned organizations and individuals as to the plans for development of an enhanced radioactive waste policy and associated strategy, specifically in terms of consultations, engagement and timing. We also request that these policy and strategy development plans be made public.

Proponents of Radioactive Waste Projects are Seeking License and Project Approvals

This is an urgent matter since there are several applications for regulatory licences underway in Canada for a variety of radioactive waste projects, and these are proceeding *de facto* within an inadequate policy environment. Some elements of Canada’s current approach are in contradiction to IAEA guidance, as noted in the report from the Mission. As a result, there is a danger that decisions are being made, and will continue to be made, essentially in a federal policy vacuum and without the appropriate thoughtful planning and leadership by Canada.

Furthermore, many of the most urgent radioactive waste issues are entirely federal responsibility as the waste is owned by the federal government of Canada and arose from the operations of the former Atomic Energy of Canada Limited. In addition, the federal government has assumed constitutional responsibility for all matters related to nuclear power and the resulting waste generation.

Despite the lack of, and pressing need for, development of a nuclear waste policy and strategy, which the government of Canada has publicly accepted, the licensing body is pressing ahead with development of five nuclear waste “RegDocs” which it plans to bring to the Commission this summer. Review of these documents by the undersigned has revealed both that they lack the context and guidance of an adequate national radioactive waste policy, and that they are premature without such a policy. However, without action by Canada to fulfill its responsibilities, applications by proponents to the licensing body, the CNSC, and CNSC development of radioactive waste “RegDocs” are threatening to *de facto* establish a path for nuclear waste without appropriate federal policy guidance. Needless to say, this will result in, at best, poor decision making, and at worst, the imposition of unacceptable risks on surrounding communities and future generations.

Radioactive Waste Policy Review Must be Open, Transparent and Public

We request the following in the federal government’s approach to developing a radioactive waste policy for Canada, along with the supporting strategy:

1. A commitment to meaningful consultation with Indigenous peoples and strong public engagement from the outset, and a commitment that development of a current and effective radioactive waste policy will be carried forward by the federal government itself, not delegated to the CNSC or the Nuclear Waste Management Organization (NWMO), and designed in such a way that public input is as important in determining the ultimate policy decisions as the views of the nuclear industry;
2. A commitment to a public process of identifying the problems and issues that are posed by Canada’s existing and accumulating radioactive waste; this process must include substantive consultation with Indigenous peoples and engagement of the public;
3. A commitment to a public process of establishing the objectives and principles that should underlie Canada’s nuclear waste policy and strategy;
4. A commitment to a public process of establishing criteria for evaluation, and for evaluating proposed approaches that may be embodied in a national radioactive waste policy and strategy;
5. A commitment to a public process of examining the implementation issues and requirements to follow a national radioactive waste policy and strategy, including an examination of the agency/ies that may be needed for implementation and their needed roles (and noting that these may not be any of the agencies that currently exist and have distinct responsibilities);
6. A commitment that the resulting policy and strategy will be predicated on the need for long-term public credibility, transparency, and capacity for effective implementation.

As expressed above, it is urgent that the federal government direct the CNSC to pause in its acceptance of active and new radioactive waste proposals and in the CNSC’s policy development via the CSNC Regulatory Documents, all of which is currently proceeding in the absence of needed federal policy and direction.

Canada Needs a National Radioactive Waste Policy

We are committed to engaging in this policy development process, and contributing from our own knowledge, experience and expertise to the discussions of these matters, which are important to Canadians now and into the far future.

We look forward to your response.

Yours very truly,

Action Climat Outaouais
Réal Lalande
Ottawa, Ontario



Action Environnement Basses-Laurentides
Lucie Massé
Oka, Basses-Laurentides, Québec



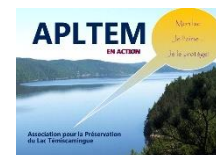
Alerte Pétrole Rive-Sud
Hélène Crevier
Longueuil, Québec



Algonquin Eco Watch (formerly)
Mike Wilton
Spring Bay, Ontario



Association pour la Préservation du Lac TEMiscamingue
(APLTEM)
Gilles Gobeil, Président
Ville Marie, Québec



Association québécoise de lutte contre la pollution atmosphérique
(AQLPA)
Jocelyne Lachapelle
Saint-Léon-de-Standon, Québec



Bawating Water Protectors
Candace Neveu
Sault Ste. Marie, Ontario

Bonnechere River Watershed Project
Dr. Kathy Lindsay
Renfrew, Ontario



Canada Needs a National Radioactive Waste Policy

Canadian Association of Physicians for the Environment
/ association canadienne des médecins pour l'environnement
Dr. Éric Notebaert
Toronto, Ontario



Canadian Coalition for Nuclear Responsibility
/ Le Regroupement pour la surveillance du nucléaire
Dr. Gordon Edwards



Canadian Council on Food Safety and Health
Ken Billings
Ottawa, Ontario



Canadian Environmental Law Association /
L'Association canadienne du droit de l'environnement
Theresa McClenaghan, Executive Director
Toronto, Ontario



Canadian Voice of Women for Peace
Lyn Adamson
Toronto, Ontario



Citizens Against Radioactive Neighbourhoods
Jane Scott
Peterborough, Ontario



Citizens Environment Alliance of Southwestern Ontario
Derek Coronado, Coordinator
Windsor, Ontario



Citoyens au Courant
Katherine Massam
Vaudreuil-Soulanges, Québec



Clean Green Regina
Ingrid Alesich
Regina, Saskatchewan

Clean North
Peter McLarty
Sault Ste. Marie, Ontario



Canada Needs a National Radioactive Waste Policy

Coalition Against Nuclear Dumps on the Ottawa River (CANDOR)
Eva Schacherl
Ottawa, Ontario

Coalition Alerte à l'enfouissement Rivière-du-Nord (CAER)
Normand L Beaudet
Saint-Jérôme, Québec



Coalition for a Clean Green Saskatchewan
David Geary
Saskatoon, Saskatchewan



Coalition for Responsible Energy Development - New Brunswick
Ann McAllister
Rothesay, New Brunswick



Committee for Future Generations
Candyce Paul
Beauval, Saskatchewan

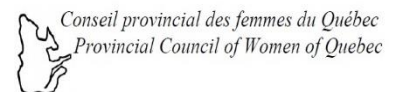


Concerned Citizens of Manitoba
Dave Taylor
Winnipeg, Manitoba

Concerned Citizens of Renfrew County and Area
Dr. Ole Hendrickson
Pembroke, Ontario



Conseil provincial des femmes du Québec
Elizabeth Hutchinson
Montréal, Québec



Council for Public Health in Mining Communities
Dr. Sue Moodie
Whitehorse, Yukon Territory

Council of Canadians, Fredericton Chapter
Gail Wylie
Fredericton, New Brunswick



Canada Needs a National Radioactive Waste Policy

Council of Canadians, Peterborough and Kawarthas chapter
Roy Brady
Peterborough, Ontario



Council of Canadians, Regina Chapter
Jim Elliott
Regina, Saskatchewan

Council of Canadians, Rothesay Chapter
Carol Ring
Rothesay, New Brunswick

Council of Canadians, Saint John Chapter
Patricia Tingley, Letitica Adair
Saint John, New Brunswick

County Sustainability Group
Don Ross
Prince Edward County, Ontario



D'Alerte Pétrole Rive-Sud
Louise Rémi
Montréal, Québec



Durham Nuclear Awareness
Janet McNeill,
Durham Region, Ontario



Eau Secours
Rebecca Petrin
Montréal, Québec



Ecology Ottawa
Robb Barnes
Ottawa, Ontario



Environment North
Dodie LeGassick
Thunder Bay, Ontario



Environmental Coalition of PEI
Gary Schneider
Charlottetown, Prince Edward Island



Canada Needs a National Radioactive Waste Policy

Fédération des travailleurs et des travailleuses du Québec (FTQ)
Denis Bolduc
Montréal, Québec



Federation of Ontario Cottagers' Associations (FOCA)
Terry Rees
Peterborough Ontario



First United Church (Ottawa) Water Care Allies
Dr. Judith Miller
Ottawa, Ontario

Dr. Frank Greening, PhD, Physical Chemistry
Technical Expert and Consulting Radiochemist
Hamilton, Ontario

Friends of Bruce
Eugene Bourgeois
Inverhuron, Ontario

Friends of the Earth
Beatrice Olivastri
Ottawa, Ontario



Green Coalition/Coalition Verte
Gareth Richardson
Montréal, Québec



Greenpeace Canada
Shawn-Patrick Stensil
Toronto, Ontario

GREENPEACE

Greenspace Alliance of Canada's Capital
J.P. Unger
Ottawa, Ontario



Greenspace Alliance of Canada's Capital
Alliance pour les espaces verts
dans la Capitale Nationale

Inter-Church Uranium Committee Educational Co-operative
(ICUCEC)
Linda Murphy
Saskatoon, Saskatchewan



Keep Nuclear Waste Out of Northwestern Ontario
Ken Wasky
Thunder Bay, Ontario

Canada Needs a National Radioactive Waste Policy

Lake Ontario Waterkeeper
Mark Mattson
Toronto, Ontario



Leap4wards
Paula Tippett
Saint John, New Brunswick



Marc Durand, PhD ing. en géologie appliquée et géotechnique
Professeur retraité, dépt. sciences de la Terre et de l'atmosphère, UQAM
Technical Expert and Consulting Geologist
Montréal, Québec

Dr. Michel Duguay, Nuclear Physicist,
Professor of Engineering, Laval University (retired)
Québec, Québec

Mining Watch Canada
Jamie Kneen, Co-manager
Ottawa, Ontario



Mouvement Québécois pour la Paix
Pierre Jasmin, co-président d'honneur
Montréal, Québec



Mouvement Vert Mauricie
Patrick Rasmussen
St-Mathieu-du-Parc, Québec



MySeaToSky
T. Carroll
Squamish, British Columbia



National Council of Women of Canada
Mrs Patricia E Leson
Prince Albert, Saskatchewan



Nipissing Environmental Watch
Peggy Walsh
North Bay, Ontario



Canada Needs a National Radioactive Waste Policy

No DGR South Bruce
Adrian & Elizabeth Groenewegen
Teeswater, Ontario

North Bay Peace Alliance
Deb Sullivan
North Bay, Ontario

Northwatch
Brennain Lloyd
Northeastern Ontario, Ontario

Nuclear Waste Watch
John Jackson
Kitchener, Ontario

Old Fort William Cottagers' Association
Johanna Echlin
Sheenboro, Québec

Older Women's Network
Kate Chung
Toronto, Ontario

Ontario Clean Air Alliance
Angela Bischoff
Toronto, Ontario

Ontario Nature
Caroline Shultz
Toronto, Ontario

Ottawa Riverkeeper
Patrick Nadeau & Elizabeth Logue
Ottawa, Ontario

Ottawa River Institute
Cheryl Keetch
Killaloe, Ontario

Oxford Coalition for Social Justice
Bryan Smith
Woodstock, Ontario



Canada Needs a National Radioactive Waste Policy

Peace River Environmental Society
Wanda Laurin
Peace River, British Columbia

PEACE-NB
Sharon Murphy-Mayne
Saint John, New Brunswick

Petawawa Point Cottagers Association
Kirk Groover & Jake Deacon
Petawawa, Ontario

Pontiac Environment Protection
Deborah Powell
Shawville, Québec

Port Hope Community Health Concerns Committee
Faye More
Port Hope, Ontario

Prevent Cancer Now
Meg Sears
Ottawa, Ontario

Protect Our Waterways - No Nuclear Waste
Michelle Stein
Municipality of South Bruce, Ontario

Provincial Council of Women of Ontario
Edeltraud Neal
Ottawa, Ontario

Raging Grannies
Martha Davis
Toronto, Ontario

Ralliement contre la pollution radioactive
Ginette Charbonneau, Physicist
Montréal, Québec

Regroupement des citoyens de Saraguay
Sylvia Oljemark
Montréal, Québec



Canada Needs a National Radioactive Waste Policy

Regroupement vigilance hydrocarbures Québec (RVHQ)
Odette Sarrazin
Saint-Gabriel-de-Brandon, Québec



Renewable Power - the Intelligent Choice (RPIC) inc.
Michelle Blanchette, Nancy Carswell
Prince Albert, Saskatchewan



Rotarians 4 Nuclear Ban
Dr. Richard Denton
Sudbury, Ontario



Rural Action and Voices for the Environment (RAVEN)
Susan O'Donnell
Fredericton, New Brunswick



Safe Water Calgary
Dr. Robert C Dickson
Calgary, Alberta



Saint John Citizens Coalition for Clean Air
Gordon W. Dalzell
Saint John, New Brunswick

Science for Peace
Robert Acheson
Toronto, Ontario



Sept-Iles Sans URanium
Marc Fafard
Sept-Iles, Québec



Sierra Club Canada Foundation
Gretchen Fitzgerald
Ottawa, Ontario

FONDATION



Sierra Club Canada Foundation Ontario Chapter
Lino Grima and Joe Duncan Co-Chairs
Toronto, Ontario

Canada Needs a National Radioactive Waste Policy

Sierra Club of Canada Foundation. Atlantic Canada Chapter
Tony Reddin
Bonshaw, Prince Edward Island



SOS Great Lakes
Ellen Dailey
Toronto, Ontario



Squamish Environment Society (SES)
Theodora Carroll
Squamish, British Columbia

Sustainable Development Association (Canadian Non-Profit Corporation since 1994)
Douglas Jack
LaSalle-Montréal, Québec



Sustainable Energy Group
Samuel Arnold
Woodstock, New Brunswick



Temiskaming Environmental Action Committee (TEAC)
Karen Pilch
Temiskaming Shores, Ontario



The Inverhuron Committee
Marti McFadzean
Inverhuron, Ontario



Toronto University Women's Club
Rebecca Hagey
Toronto, Ontario



UNIFOR
Raymond Thibert
Montréal, Québec



Watershed Sentinel Educational Society
Anna Tilman
Aurora, Ontario



Canada Needs a National Radioactive Waste Policy

Women's Healthy Environment Network (WHEN)
Cassie Barker
Toronto, Ontario



cc. MP Shannon Stubbs, Natural Resources Critic, Conservative Party of Canada
MP Mario Simard, Natural Resources Critic, Bloc Québécois
MP Mumilaaq Qaqqaq, Natural Resources Critic, New Democratic Party of Canada
MP Elizabeth May, Green Party of Canada

Members of the Canadian Parliament

Please direct reply correspondence to the following:

Gordon Edwards
Canadian Coalition for Nuclear Responsibility
ccnr@web.ca Telephone 514 839 7214

Theresa McClenaghan
Canadian Environmental Law Association
theresa@cela.ca Telephone 416 960 2284

Ole Hendrickson
Concerned Citizens of Renfrew County and Area
ole@nrtco.net Telephone 613 234 0578

Brennain Lloyd
Northwatch
brennain@northwatch.org Telephone 705 497 0373

John Jackson
Nuclear Waste Watch
jjackson@web.ca Telephone 519 744 7503

Ginette Charbonneau
Ralliement contre la pollution radioactive
ginettech@hotmail.ca Telephone 514-246-6439