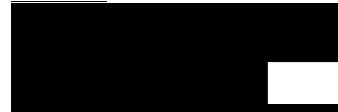


Comments to NRCan on Radioactive Waste Management

from



Stanley, NB

24 March, 2021

1. In Canadian mining, Land Reclamation, Water Treatment and Waste Management are the responsibility of the owner. Canada has a poor history of corporate abandonment and non-compliance on all these fronts. Realistic guaranteed up-front financial bonds are required to cover any proposed radioactive waste management scheme. If security bonds stand in the way of a radioactive waste management proposal, then the proposal is not feasible.
2. A catastrophic event at any radioactive waste management site will have devastating and widespread human and environmental impacts. The public can only intelligently grant social license to a waste management proposal if it has a realistic and informed notion of the possible consequences of a failure. Science based Disaster Modeling, communicated transparently to the public should be a pre-requisite and a "Condition of Approval" of any proposed waste management scheme.
3. The economics of a radioactive waste management scheme comprise one factor, if not the most important factor leading to human and environmental risk. Government regulators have demonstrated no capacity to accurately assess financial feasibility of proposed projects, as evidenced in mineral, oil and gas extraction, particularly evident in the past decade around the Sisson Mine and shale gas development in New Brunswick, and around other projects nationally. A new regulatory paradigm of objective and independent assessment of economic feasibility, specific to radioactive waste management, commissioned by the government regulators, and paid for by the proponent, is required. All storage and management is only as secure as the financial capacity to maintain it. Perpetual care implies infinite and perpetual financial capacity to care.
4. Tracking of deep ground water is not a well-developed science. As water becomes one of the most valuable resources of the future, it will be imperative to identify all possible risks to the integrity of Canada's water resources posed by any plan for Radioactive Waste Management, including the impacts on ground water posed by past and future seismic events, triggered by geologic and human induced seismologic changes. The risks must be communicated to the Canadian Public in an open and transparent way.