

**Comment from [REDACTED], Gatineau, QB**

**Concerned Citizen**

At a minimum, Canada needs a nuclear waste management policy that conforms to international standards, such as those laid down by the IAEA, and that also ensures that Canada is in conformity with other international treaties to which it has signed on, such as nuclear non-proliferation treaties. This is necessary not only to ensure the barest minimum of safety for Canadians, but also to prevent the serious embarrassment that would result internationally from failing to abide by those treaties. Failure to abide by those treaties would have direct repercussions at bodies like the United Nations, on whose Security Council Canada recently sought a seat. Why would any other country support a Security Council bid from a country whose own nuclear waste management regime showed such a cavalier disregard for global peace and security as to violate basic norms in those areas, and whose attitude toward the international treaties to which it had signed on was so cavalier that it felt it could disregard them whenever it chose to do so?

In order for any progress to be made with regard to nuclear waste management, Canada must have a fully independent agency, at arm's length from both government and the nuclear industry, to oversee radioactive waste management and decommissioning. The agency currently charged with these tasks, the Canadian Nuclear Safety Commission, is painfully and obviously not up to the job; it is the classic example of a captive regulator, drawing criticism in the past from even the strongly pro-nuclear IAEA.

There must be no reprocessing, now or ever, of plutonium or other radioactive waste. In addition to posing the gravest threat to Canadians' health and safety, such reprocessing would be in direct violation of the nuclear non-proliferation treaties to which Canada has signed on, and which it has otherwise faithfully observed over many years. Allowing the reprocessing of plutonium is giving an [REDACTED] to potential nuclear terrorists. Doing so is simply the wrong thing to do, from all possible perspectives. In addition, it risks doing Canada's reputation in the international community serious harm, as noted above.

All information regarding decommissioning plans must be publicly available and peer-reviewed, including by Indigenous people as well as the general public. All decommissioning projects must include a comprehensive strategy for the transmission of information and knowledge to future generations, to whom we are responsible for leaving the earth in habitable condition. And end-state decommissioning objectives should be based on ecological and human health, and

decommissioning work must show that sites have been fully remediated and are fully safe both for human beings and for the rest of creation.

It should also go without saying that nuclear waste must not simply be abandoned anywhere, and that no nuclear waste should be stored (however it is stored) anywhere near a major body of water. Current plans, which involve deep burial of waste within a few kilometres of the Ottawa River, source of drinking water for a quarter of the country's population, are simply not acceptable. Even the candidate from the pro-nuclear People's Party of Canada said as much in a political debate during the 2019 federal election campaign. Why should we even consider adopting storage arrangements so dangerous that they would be rejected out of hand by the average 6<sup>th</sup> grader?

The above are the barest minimum of requirements needed to ensure a minimum standard of safety and a minimum level of conformity with international treaties and norms. Canada can and should do much better—and very soon. We must start by giving up on the idea that small modular nuclear reactors (SMNRs) will help us meet our climate change objectives under the Paris Accord and other international agreements. They will not. SMNRs will take far longer to bring on stream, by any account, than we have to meet our targets under the Paris Accord. They are also extremely dangerous on their own according, posing waste management challenges we are by no means prepared to meet. If we cannot even adequately dispose of the nuclear waste we have already created, why in God's name would anyone think we could safely handle the large additional amount such reactors would inevitably create?

Ultimately, our desired end state must be disengagement from the nuclear industry—complete disengagement. There are far cheaper and safer ways of meeting our climate change obligations, among them solar power, tidal power, and wind power. By hitching our country's wagon to the plummeting star of nuclear power, which many major western countries and allies are well on the way to eliminating, we risk battering our economy and doing irreparable damage to our beautiful country's environment. It is unnecessary for us to do so; therefore we must start actively seeking ways to disengage from the nuclear power industry. In the meantime, the obvious suggestions will hopefully provide a safer way of dealing with the far too large amount of nuclear waste we have already generated.