

Comments regarding Canadian Radioactive Waste Policy Review

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General Comments

I am very concerned that there are huge amounts of radioactive waste being stored from, and produced by nuclear energy plants in Canada. It is critical that our federal government adopt policy and laws to prevent potential ecological and public health disasters that could be caused by leaks and improper storage of radioactive waste.

In order to achieve this:

1. Canadians must have easy access to information regarding the management and risks, including transportation, of radioactive waste.
2. The right to engage in decision-making regarding the management of radioactive waste must be enshrined as a right for Canadians and concerned public interest organizations.
3. Government and the nuclear industry must be mandated to be open and transparent in the management of radioactive waste and its transportation.
4. Canada must have an **independent** national agency to control, monitor and oversee radioactive waste management and decommissioning. It must not be influenced by government or industry.
5. Canada must have federal policy and laws to dictate perpetual care and monitoring of radioactive waste. Radioactive waste must never be abandoned.
6. There must be no permission for importing of radioactive waste to Canada from other countries
7. There must be no permission for extraction (reprocessing or pyro-processing) of radioactive fuel waste, most especially to produce plutonium.
8. Canada's **radioactive waste strategy** (note that this is not the Radioactive Waste Policy) must be changed so that it is not to be implemented by the nuclear industry, through the NWMO (Nuclear Waste Management Agency) which is completely owned by the waste producing utilities in Ontario, Quebec and New Brunswick.

In addition, I agree with these detailed points:

WASTE MINIMIZATION

Prohibition on reprocessing irradiated fuel should continue

The extraction of plutonium must be explicitly prohibited

Practice of "free release" of radioactive materials should be discontinued

Detailed tracking of all radioactive materials, including (very) low level radioactive wastes

Waste characterizations and inventories must be detailed, current, and peer / public reviewed and accessible

WASTE DISPOSAL

The notion of “disposal” should be replaced by an approach of long-term care and stewardship

Independence and transparency should be integrated throughout the radioactive waste policy

Agencies responsible for radioactive waste research and oversight should be independent of the nuclear industry

Canada’s nuclear regulator should report directly to parliament

Indigenous peoples and the public should be engaged in policy and project development and review, with funded access to legal and technical advisors and all relevant documentation

WASTE STORAGE

Design, operations and monitoring for fuel waste storage systems should be open and transparent, and include public access to information

Storage systems should be designed to minimize risk and maximize protection of human health and the environment

Waste storage systems should be passively safe, should be “hardened” against extreme weather and malevolent acts, and should be dispersed across the site, at the point of generation

DECOMMISSIONING

Decommissioning approaches must at minimum conform to international safety standards.

Decommissioning planning and implementation should be information based, including full information about the condition of the site (such as contamination of soil, ground or surface water) and a full inventory of radioactive wastes (on site and decommissioning wastes)

Information must be publicly available and peer reviewed, including by the public and Indigenous peoples

All decommissioning projects must include a comprehensive strategy for the transmission of information and knowledge to future generations

End state objectives should be based on ecological and human health and the decommissioning work must show that the site has been fully remediated and is now fully safe.