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**Comments on the Modernizing Canada's Radioactive Waste Policy ENGAGEMENT SUMMARY
REPORT 1: Preliminary Report on Engagement Results (November 16, 2020 - February 19, 2021)**

Page 4:

Quote:

"However, it is important to understand the potential climate and health benefits derived from nuclear energy when considering an approach to radioactive waste."

Comment:

There are potential benefits but there are also potential disadvantages when considering the potential climate and health benefits. On balance, I believe the peer-reviewed research is on the side of the disadvantages. In any case, **you need to mention both benefits and disadvantages in the report.**

Page 6:

Quote:

(this includes those who feel that Canada should exit nuclear generation entirely and transition to other energy sources).

Comment:

Really? You've put this comment in brackets? I have heard and read numerous comments from Canadians who want to end nuclear generation entirely as a primary policy approach to nuclear waste management. **These views must feature prominently in the report, not relegated to an afterthought.**

Page 7:

Quote:

Thus, we may wish to give consideration to long term storage requirements that waste be accessible to future recycling technologies.

Comment:

The word "recycling" is not only unscientific it is also inaccurate. At best, the extraction of plutonium from used nuclear fuel will access one percent of the fissionable materials for further use. **In the report, you must use the proper terms for this process: reprocessing, pyroprocessing, plutonium extraction. You must also highlight the research that clearly outlines the drawbacks and dangers of this process rather than promoting this idea uncritically.**

Page 12:

Quote:

"The importance of consultation and engagement with Indigenous peoples, communities, and stakeholders was a theme that ran through all of the discussion topics."

Comment:

I'm sure you are aware of the resolution on nuclear reactors with implications for future cessation of radioactive waste generation, adopted by the Assembly of First Nations; the resolution on nuclear energy and nuclear waste adopted by the Wolastoq Grand Council; the resolutions of the Chiefs of Ontario and the Iroquois Caucus with implications for radioactive waste. **These documents must be referenced in your report if you are truly committed to engagement and consultation with Indigenous peoples.**

Quote:

"This is a difficult challenge, however, in that no party is universally perceived as "neutral". For some, a government that even presents information on efficacy of nuclear and its safety is advocating a position. This means that Canada will need to think deeply about how it designs engagement and education on nuclear and radioactive waste management more broadly..."

Comment:

This is where you insert the recommendation made by many, many Canadians that we have an independent agency to oversee radioactive waste management. **This recommendation must be featured prominently in the report.**

Quote:

"Simultaneously, we heard views that disposal policy should actively enable future technologies to recycle and repurpose what today is waste, but what might tomorrow be fuel or other useful products."

By now I'm sure you've received numerous submissions recommending against "recycling" used fuel waste. See my comment above about this. **I expect those recommendations against allowing extraction of plutonium from used fuel waste will be featured prominently in the report.**

Page 13:

Quote:

Moreover, as an exporter of nuclear materials, there is some argument that we have a responsibility to help ensure the long-term stewardship of the products we export.

Comment:

With all due respect, this is a ridiculous statement. We do not export nuclear waste, we export uranium. Nuclear waste and uranium are not the same thing (!!!). **We certainly bear no responsibility for importing nuclear waste. I'm sure there will be many submissions recommending no importation of nuclear waste and I expect to see this in the report.**