

Monday, May 31, 2021

Jim Delaney
Director, Uranium and Radioactive Waste
Ministry of Natural Resources Canada (NRCan)

cc. The Honourable Seamus O'Regan
Minister of Natural Resources Canada

Dear Mr. Delaney, NRCan staff, and The Honourable Seamus O'Regan,

At six different NRCan roundtable seminars in recent months I have expressed a number of major concerns, mostly in reference to the deep geological repository (DGR) for high level waste, for which the Nuclear Waste Management Organization (NWMO) continues to try and persuade either the Municipality of South Bruce, in Midwestern Ontario or, alternatively, the Town of Ignace in north-western Ontario – to become the final “willing host community.”

Severely compromised physical health plus preparing for a national conference deadline, have limited my time to compose this written submission by the May 31st deadline. I am not showing you the precise content of my conference presentation – to the Canadian academic community – until a future time. However, the title is “The Limitations of Science to Justify Deep Burial of Radioactive Waste.” This letter to you, however, will communicate more pressing issues.

What I identify below are three topics at this time, to critique. At a future time, I will prepare a more detailed critique, at a future time, which you will receive at the same time as members across political parties in our Canadian parliament, as well as Prime Minister Justin Trudeau.

#1 – The Role of the Ministry of Natural Resources Canada (NRCan)

NRCan is in a conflict of interest while being responsible both as the federal promoter of the nuclear industry and also for creating policy on Radioactive Waste Management, the latter which is supposed to protect Canadians as well as the natural environment.

That conflict is why a number of different federal ministries ought to have major input into the policy update. Furthermore, the Canadian Nuclear Safety Commission (CNSC) - which only can suggest “guidelines” instead of making clear demands upon the nuclear facility owners – ought to be replaced by an authentically independent agency, because the CNSC has lost the public trust. For that reason, fewer and fewer citizens are willing to contribute their knowledge to public consultations, because nothing meaningful is heeded by the CNSC.

#2 – The Nuclear Waste Management Organization (NWMO)

For nine years I have witnessed the shocking and disgraceful arrogance, and pretence to work with community members, from both the Ontario Power Generation, Inc. (OPG), and the Nuclear Waste Management Organization (NWMO).

What is worse is the Ministry of Natural Resources Canada designating NWMO to be the organization responsible for all levels and types of radioactive waste across Canada. Why was there no public consultation prior to giving such a huge moral responsibility to an organization which was created by corporate nuclear power owners, and whose agenda and trajectory is totally biased to support and to expand the nuclear industry???

I have witnessed a series of questionable practices as well as a continual flow of misinformation from both OPG and NWMO starting with the two public hearings held for the previously proposed OPG DGR in 2013 and 2014. I attended every day, all day, and was gobsmacked at the long list of questions put to OPG by the Joint Review Panel (JRP) of the Canadian Environmental Assessment Agency, which OPG could *not* answer, even with the NWMO seated with the OPG as consultants. The lack of answers to important questions is why the JRP felt forced to request a second public hearing, to give OPG extra time to find answers. The continuing inability to do so, however, undoubtedly is at least one of the reasons why the Saugeen Ojibway Nation (SON) voted a resounding, no, to the proposed OPG DGR.

As a home-owning resident of Bruce County for 13 years – and since late 2019 relocating immediately south to Huron County (a half hour from my former farmhouse) - I have witnessed a consistent pattern of refusal by both the OPG as well as the NWMO to ever be willing to sit on a panel for any town hall meeting that is open to the whole grassroots community, in which the nuclear proponents would be obliged to answer concerns voiced by the whole community. Instead, OPG and NWMO only speak in limited spaces where they have total control.

Focusing on the NWMO, instead of authentic conversations with grassroots people, the NWMO only schedules meetings with community groups, individually and separately, such as local business or charitable groups, etc., in which the NWMO controls the dialogue. Much worse, and totally unethical, is its continuous offerings of large sums of money to every small group, local schools, and various municipal projects – the latter which largely will benefit the NWMO for its future hoped-for DGR facility, i.e. improving rural roads, etc. This financial influence goes way beyond what could be called ethical as per more limited, and occasional, corporate donations which are commonly given in all communities.

The result building through many months is that the Municipality of South Bruce now has more NWMO-paid staff than its own normal staff and, consequently, the Council blatantly no longer

represents all of its constituents (violating its own moral responsibility). Instead, Council forwards all letters against the DGR (probably unread and never discussed, because I watch all meetings on Zoom) to the South Bruce Community Liaison Committee (SBCLC). The latter, since it began, has almost always excluded guest speakers who are experts from outside the community who could contribute a wider range of perspectives, and only included community volunteers for the CLC who support the proposed DGR. No honest discussion is allowed.

The final blow to South Bruce is that, because of the intrusion by the NWMO, this rural community has become increasingly divided among neighbours, to the point of increasing vandalism incidents on private property, and OPP personnel quietly overseeing activities by the two oppositional groups, hoping to avoid more serious acts of violence.

In the Council's profoundly NWMO-influenced focus on the economic benefits of a future DGR, the much more important role of an agricultural community – namely, food security, is being sabotaged – together with the current livelihoods of farming families who already have been told by buyers of dairy products and meat that their produce no longer will be welcomed for purchase. Meanwhile, around the planet and also in Canada – particularly in Ontario – development plans as well as extreme weather events are reducing the availability of farmland and food security for the future. Why reduce prime farmland to a nuclear wasteland???

As for the NWMO, when the now painfully aware farmers and other local citizens do their own research, which includes reading NWMO documents, and raise questions to the NWMO, what is tremendously upsetting is the fact that the NWMO either declares that it does not have the answers, i.e. if and when groundwater gets contaminated, what to do. Or alternatively, NWMO refuses to do fuller environmental studies until NWMO has official control of South Bruce as the final chosen 'willing host community.' One example is that the NWMO is *not* including radionuclides in its local well water studies, not even radon, which has forced a number of local farmers use their own money to pay for more inclusive studies, to include natural background radiation sources, and other potential contaminants, for a genuine 'baseline study.'

#3 – Proper Scientific Studies and International Best Practices are an Illusion

Aside from raising the question whether sufficient science ever could justify the proposed DGRs, I will begin by pointing out a further egregious practice by the NWMO, in reference to misinformation that is communicated regularly, through NWMO marketing materials as well as in all local newspapers, such as press releases and more. In fact, I intend to investigate one local online entrepreneur who owns four websites that show newspaper titles. However, all of its content about the proposed DGR is communicated from a one-sided pro-DGR position. If these

are genuine newspapers, they violate the newspaper industry code by not communicating a range of positions on issues of public interest. But, alternatively, I need to find out where is the owner of these websites getting its money, and is the NWMO actually financing these phoney news outlets? As a former journalist, investigating potential fraudulence is on my “to do” list.

As I came close to the midnight hour, I am now an hour past midnight, I felt compelled to inform you about the pattern of misinformation communicated locally from NWMO, rather than focus on the limitations of science, an important topic for a future time. My conference presentation this week will point out that there is *not* international consensus to support DGRs. You may recall, in one of the NRCan roundtables, I suggested that NRCan staff read *World Nuclear Waste Report 2019* which explains the decades of research on the “concept of” a DGR, and continuing delays to construct an actual DGR. To this day, there still is no operating DGR for high level nuclear waste anywhere on the planet – although NWMO literature distributed locally in 2020 declared otherwise, and lied. Finland, as you know and I know, *is* constructing such a DGR, based on the Swedish KBS-3 design, but a long way from even applying for an operating licence. Meanwhile, in Canada, thus far, the NWMO has changed the configuration of the Finnish ramp, as well as still doing research to determine a safer copper canister – which has been a major point of controversy in Sweden, as per its Environmental Court.

In other words, how can you have scientific justification for a DGR which continues to be nothing more than an experiment? How dare the NWMO and the federal government try to foist this untried, yet inevitably dangerous, industrial experiment that involves some of the most lethal contaminants on the face of the earth – high level radionuclides – which will eventually be released into the environment, impacting on water, soil and air, plus multiple levels of organisms all the way up the trophic levels of the food chain, to then impact human health!!!

Time is too short for me to outline here a suitable cogent argument about why and how our human-constructed measuring tools and tools of prediction, such as computer modelling, are sorely lacking to mimic a natural world always in flux. Please take note, however, that even Bruce Power, in a fleeting moment of transparency in its 2018 Environmental Protection Report – available on its website – stated: “Despite the incorporation of best available practices, not all radionuclides can be reliably monitored in all media [referring to water, soil and air].”

Tonight, I believe my heart has compelled me to focus most of my public input for this deadline on the questionable role of the NWMO - locally and nationally. Almost every person whom I know who challenges DGRs totally refuses to participate in NWMO’s national strategy process, based on witnessing/experiencing NWMO’s unethical practices of manipulation and control to engage people in small communities and how it uses information for its self-serving agenda.

With honesty, Dr. [REDACTED] PhD

