

April 2nd, 2022

Submitted by International Physicians for the Prevention of Nuclear War Canada (IPPNWC).

We are grateful for the opportunity to comment on Canada's draft Policy for Radioactive Waste Management. IPPNWC recognizes that there is no meaningful medical response to a nuclear catastrophe. Specifically in the context of the Radioactive Waste Management Policy, we are concerned about the connection between nuclear power and the production of nuclear weapons.

Canada is entertaining new small modular nuclear reactor (SMR) technologies which would involve using enriched uranium or plutonium as fuels. This has never been done before in Canada and may destabilize international safeguards. Both enriched uranium and plutonium can be used directly to make nuclear weapons. Plutonium made the Nagasaki bomb and enriched uranium made the Hiroshima bomb.

Unfortunately even unenriched uranium can be used to make a nuclear weapon as happened in 1974 when Canada's gift of a CANDU reactor to India was turned into nuclear weapons.

In addition, a future violent international conflict could easily target nuclear power plants including small modular units scattered in multiple locations. These nuclear facilities are essentially horrendous weapons already on site and are vulnerable to attack.

Specific Concerns not addressed by the new policy draft:

1. Canada needs independent oversight for the nuclear industry. This must be arm's length from government and the industry. It must look at all aspects of the industry from mining, milling, transportation, operational, waste categorization, waste inventories, waste care, to eventual decommissioning. The oversight group must not promote the industry.
2. The independent oversight group must check industry's assessment of its designation of its waste categorization.
3. Until a viable solution for current existing waste is resolved, a curfew on new nuclear power plants must be considered and be open for discussion by all.
4. Affirm Canada's longstanding policy of disallowing reprocessing of radioactive wastes for plutonium. Plutonium extraction must be prohibited due to environmental, security and proliferation issues.
5. Indigenous people have been disproportionately affected by nuclear activities such as mining on their lands. Current indigenous voices must be heard, even if this means not placing a deep geological repository on their lands.
6. Absolutely no importation of radioactive waste for disposal in Canada.

Respectfully submitted by [REDACTED] for IPPNWC