Comments on NRCAN Draft for Public Comment on "Modernizing Canada's Policy for Radioactive Waste Management and Decommissioning".

Weaknesses of the Draft Policy:

1. **The draft policy does not establish independent oversight for the nuclear industry and nuclear operations.** Like many other Canadians, I have found that the Canadian Nuclear Safety Commission has been "captured" by the nuclear industry. The regulator needs to be independent of the nuclear industry, and independent of government departments, like NRCAN, which promote the nuclear industry to the detriment of our health and safety. The Environment and Health Departments should provide better oversight for the nuclear industry. I agree with the "Statement by Nuclear Waste Watch's Radioactive Waste Review Group, An Alternative Policy for Canada on Radioactive Waste Management and Decommissioning" of March 2022, p. 3 on the "**Need for a publicly-owned agency independent of the nuclear industry**". This agency would oversee management of radioactive pollutants and decommissioning of nuclear facilities, ensure that waste management target schedules are respected and reports on progress according to money spent are made available to the public. "Scientific, technical, and civil society groups, including Indigenous peoples" need to be created to support this agency.
2. **The draft policy does not direct a national standard for characterization of radioactive waste and maintenance of a verified inventory.** This must be done.
3. **The draft policy puts the nuclear industry in charge of waste management strategies.** This must be stopped. As seen in the case of the Chalk River waste operation, it puts the health of millions of people in Ontario and Quebec at risk, now and in the future. Instead, the federal govt., indigenous people and other concerned Canadians must be involved in developing and implementing an "integrated strategy" for nuclear waste management.
4. **The draft policy makes possible reprocessing of nuclear waste.** This is contrary to Canadian policy, and can lead to nuclear weapons proliferation. **We must have a complete ban on nuclear reprocessing, especially in New Brunswick, which is currently threatened by a Moltex proposal.**
5. **The draft policy allows for "exceptions" to the ban on the import of nuclear waste.** This is again very bad, especially for New Brunswick, which is currently threatened by a Moltex proposal**. We must have a complete ban on import of nuclear waste.**

Conclusion: I agree with the principles for radioactive waste management supported by the Anishinabek/Iroquois Alliance: No abandonment, monitored and retrievable storage, better containment, more packaging, storage away from major water bodies, no import or export of radioactive wastes.

Sincerely yours,

[redacted]

Saint John, NB , [redacted]