

Dear reader at NRCan, radioactive waste policy review.

Your 'plan' to deal with radioactive waste is terrifying. You have no ability to recognize your own bias!

Here is your bias, for you, to please at least entertain:

NRCan has one mandate: facilitate extraction of 'resources' from the natural environment so that capitalist corporations can turn a profit. This mandate has seen the forcible and inhumane removal of Indigenous peoples from their homes, and the cultural genocide inherent in initiatives like the residential school system, the Indian Act Agent control over daily lives, and the innappropriate, illegal abuse of the term "free, prior, informed" to facilitate Indigenous community fracture via bribes by corporations when in fact it is the CROWN's duty to neogiate land use deals with ALL of the Indigenous Nations signatory to treaties. The system whereby corporations are allowed to bribe small, struggling Band Councils to somehow magically show "free, prior, informed consent" is inherent in this colonialist, racist ministry, the Ministry of Natural Resources Canada.

To even house the care of radioactive waste under this ministry is not supportable!

To see your own bias, let us take a critical approach to your own document's first paragraphs:

"Canada has been a world leader in the development and deployment of nuclear technology for decades.

For example, Canadian uranium and science was responsible for the development of the inception of the nuclear arms race. Hiroshima, Nagasaki, and the horror of the Marshall Islands, are ours to fail to own up to. Canadian uranium and technology was responsible for India attaining the nuclear bomb. Canadian "leadership" threatens to spread plutonium-extraction technology to the entire planet, fueling a terrifying new nuclear arms race.

https://youtu.be/v0pV2hk_-3Y

<https://youtu.be/lbju4ibalb4>

"Fuelled by the world's richest deposits of uranium from Saskatchewan, nuclear energy has enabled Canada to have one of the most sustainable energy mixes worldwide."

There is nothing sustainable about nuclear activities in Saskatchewan or in Canada. This is a dangerous, polluting FINITE industry. The pollution is unlike other industries. The pollution lasts for millennia. The health impacts are slow to manifest. Bizarre cancers that manifest years after exposure, or in newborns, go totally uncatalogued by a government intent on protecting for-profit death-dealers instead of citizens living in these ecosystems.

“Nuclear energy is recognized internationally as playing an important role in meeting climate targets and achieving a net-zero emissions economy by 2050.”

This is a conspiracy of silent acquiescence to the ultra-rich, and is utterly untrue.

<https://link.medium.com/kcp4PLlhMob>

“..As a non-emitting source of energy...”

This is a bald-faced lie to Canadians. The nuclear fuel chain is deeply reliant on carbon-based economies. It also emits RADIATION AND RADIONUCLIDES INTO OUR ENVIRONMENT AND BODIES, FOREVER.

“...it has also contributed to human health by helping to reduce air pollution. Canadian nuclear technology has supplied the world with radioisotopes for life-saving cancer treatments and medical diagnoses.”

The number of Canadians who have, are and will die from exposure to radiation and radionuclides from this polluting and dangerous industry far outweigh any benefits we see during the current decades of use. Also, radioisotopes no longer require nuclear tech for their fabrication.

“...It supports Canadian industries, such as the agriculture...”

Like the plutonium-laced and uranium-laced fertilizer sold and distributed by Cameco.

“...aviation...”

Like the nuclear-weapons-bearing airplanes circulating our beloved Earth right now.

“...mining and petroleum industries...”

See “Saskatchewan, Serpent River and Elliot Lake, and Blind river and Mississauga First Nation” links, below, to see how destructive and NOT beneficial these mining operations truly are.

“Moreover, nuclear technology has made it possible for scientists in our universities and research establishments to engage in groundbreaking research.”

Which is thoroughly useless in a future where climate catastrophe - due to unwillingness to switch to renewables THAT ARE AVAILABLE NOW and instead bank on new nuclear nightmares - leave us with a legacy of terror, horror, and pain.

“Nuclear research and the development and use of nuclear technology, however, result in the production of radioactive waste. Radioactive waste consists of a gas, liquid, sludge or solid that has been declared as waste...”

The bodies declaring some spent fuel as “waste” but seeking to monetize it, and turn it into “fuel” have captured the lawmakers in Canada, and the employees at NRCan and CNSC. Everyone in this industry knows that nuclear weapons proliferation is inextricably linked to nuclear power production, yet no one is willing to talk about that.

“...and contains a nuclear substance in excess of the clearance or exemption criteria...”

The levels of which NRCan and CSNC have a track record of changing arbitrarily to suit industry needs. Also, this designation “and contain a nuclear substance” is erroneous. Many radioactive wastes are radioactive, yet the substance itself (concrete, glass, chairs, gloves, etc) have not changed their basic composition. Also, do the thousands of tonnes of radioactive tailings and exposed ore contain “nuclear substance”?

“...and without foreseeable use....”

This line of reasoning in your document is terrifying. To term all CANDU high level waste as possibly having a foreseeable use - reprocessing for use in SMRs - means you are opening the door to no longer safely care for this type of waste. You open the door to turning used CANDU fuel over to private corporations with oversight by the compromised CNSC.

“...While radioactive waste is produced as part of the normal operation of nuclear facilities, including their decommissioning, it also may be produced as a result of nuclear or radiological emergencies....”

Like meltdowns and war. Which are increasingly likely given the social instability of a climate-crisis future and attendant geopolitical instability.

RECOMMENDATION ONE: Radioactive Waste decision-making must be transferred jointly to Environment Canada and Health Canada.

The stakes are too high! Past decades prove that the problems of radioactive waste contamination into our ecosystems and bodies have been exacerbated by the mismanagement by this ministry since the inception of the nuclear industry in Canada in the following communities:

- Peterborough

<https://anchor.fm/sarah-gabrielle-baron/episodes/Are-kids-in-danger-in-Peterborough-e100mnk>

- Port Hope

<https://anchor.fm/sarah-gabrielle-baron/episodes/Port-Hope-e165fkk>

- Pinawa

<https://anchor.fm/sarah-gabrielle-baron/episodes/Pinawa--Manitoba-e14k31i>

- Chalk River

<https://anchor.fm/sarah-gabrielle-baron/episodes/Chalk-River-e1685p4>

- Serpent River and Elliot Lake

<https://youtu.be/xBWDx6HXa2Y>

- Blind River and Mississauga First Nation

-

http://download.isiglobal.ca/cnsc/2021-11-23_24_25/2021-11-24-4H.mp4

- Darlington and Pickering and Bruce and Point Lepreau NPPs

http://ccnr.org/tritium_unlimited.pdf

http://ccnr.org/anyone_responsible_2015.pdf

http://ccnr.org/CNSC_GE_2012_Transcript.pdf

<https://anchor.fm/sarah-gabrielle-baron/episodes/Askomiw-Sanaqok-forever-dangerous-to-life-e1cgict>

- northern Saskatchewan (all of it)

<https://anchor.fm/sarah-gabrielle-baron/episodes/Saskatchewan-e1d4sj0>

- Tiverton and Legace

<https://anchor.fm/sarah-gabrielle-baron/episodes/Nuclear-Waste-Dump-in-Southern-Ontario-e14et03>

<https://wethenuclearfreenorth.ca/>

None of these communities have ever received a proper accounting of the high rates of bizarre cancers! None have been tested for bioaccumulation of radionuclides. Why? Because the industry and NRCan knows what you will find! You are slowly killing us, Canadians, and your terrible 'plan' in this callously shallow document proves that you have no inclination to use a data or fact-based (or humane, or intelligent) approach going forward.

I have taken the time to talk with Canadians living in these radioactive communities. You can at least take the time to listen to their very legitimate concerns. Hopefully, you will stop ignoring them, please.

RECOMMENDATION TWO: Make radionuclides top of the “most toxic” materials listed with both Environment Canada and Health Canada.

RECOMMENDATION THREE: forbid the use of the word “recycling” when pro-SMR propagandists try to sell us a radioactive future. This is “reprocessing” and will contribute to the radioactive waste profile in our nation in both volume, form, and as yet unknown concentrations of radionuclides.

<http://ccnr.org/nukechain.html>

RECOMMENDATION FOUR:

Actually listen to Indigenous Leadership. The Iroquois Caucus and Anishinabek Nation made a joint declaration on nuclear waste in 2017. It is detailed, intelligent, and wise. Use this as the base of any framework on care of nuclear waste in our country:

“For the long-term management of radioactive wastes, the five (5) principles that were all agreed upon are:

No Abandonment: Radioactive waste materials are damaging to living things. Many of these materials remain dangerous for tens of thousands of years or even longer. They must be kept out of the food we eat, the water we drink, the air we breathe, and the land we live on for many generations to come. The forces of Mother Earth are powerful and unpredictable and no human-made structures can be counted on to resist those forces forever. Such dangerous materials cannot be abandoned and forgotten.

Monitored and Retrievable Storage: Continuous guardianship of nuclear waste material is needed. This means long-term monitoring and retrievable storage. Information and resources must be passed on from one generation to the next so that our grandchildren’s grandchildren will be able to detect any signs of leakage of radioactive waste materials and protect themselves. They need to know how to fix such leaks as soon as they happen.

Better Containment, More Packaging: Cost and profit must never be the basis for long-term radioactive waste management. Paying a higher price for better containment today will help prevent much greater costs in the future when containment fails. Such failure will include irreparable environmental damage and radiation-induced diseases. The right kinds of packaging should be designed to make it easier to monitor, retrieve, and repackage insecure portions of the waste inventory as needed, for centuries to come.

Away from Major Water Bodies: Rivers and lakes are the blood and the lungs of Mother Earth. When we contaminate our waterways, we are poisoning life itself. That is why radioactive waste must not be stored beside major water bodies for the long-term. Yet this is exactly what is being planned at five locations in Canada: Kincardine on Lake Huron, Port Hope near Lake Ontario, Pinawa beside the Winnipeg River, and Chalk River and Rolphton beside the Ottawa River.

No Imports or Exports: The import and export of nuclear wastes over public roads and bridges should be forbidden except in truly exceptional cases after full consultation with all whose lands

and waters are being put at risk. In particular, the planned shipment of highly radioactive liquid from Chalk River to South Carolina should not be allowed because it can be down-blended and solidified on site at Chalk River. Transport of nuclear waste should be strictly limited and decided on a case-by-case basis with full consultation with all those affected.”

<https://www.anishinabek.ca/2017/05/02/joint-declaration-between-the-anishinabek-nation-and-the-iroquois-caucus-on-the-transport-and-abandonment-of-radioactive-waste/>

RECOMMENDATION FIVE: A total moratorium on new nuclear development, including mining expansion, acceptance of international yellowcake for refinement at Blind River, extension to the lives of aging reactors, funding for SMRs, and approval or development of SMRs.

This call for a moratorium is widespread in Canada. From the Assembly of First Nations in 2018, to a recent letter signed by more than 70 nonprofit organizations. Stop the madness! Radioactive waste lasts, effectively, forever, and we still have no safe plan for its care!

RECOMMENDATION SIX: stop the spread of nuclear reprocessing technology. SNC-Lavalin is a corrupt organization and their ownership of plans coming out of CNL is neither appropriate nor safe.

RECOMMENDATION SEVEN: Full investigation and independent judicial review of all CNSC activities and approvals since 2018 (when Greenpeace and CELA exposed that CNSC lobbied to have SMRs be exempt from Environmental Impact Assessments).

RECOMMENDATION EIGHT: Strictly prohibit and monitor the movement of used CANDU fuel, for experimentation, or any use. The recent activities of unknown militants at the Chernobyl and Zaporizhzhia nuclear facilities should act as warning to us all: a plutonium economy is emerging!

<https://youtu.be/i-0NlrcaY08>

<https://themoscowproject.org/explainers/seychelles-uae-george-nader-michael-flynn-middle-east-marshall-plan/>

That Bruce Power has granted itself the ability to create a “waste sorting facility” on the shores of Lake Huron needs to be reviewed.

The entire concept of a Deep Geological Repository (a.k.a. dump, where this waste in this experiment will be irretrievable) needs to be reviewed.

That the for-profit industry, titled NWMO, has been granted licence to do whatever it wants with our collective radioactive waste legacy, needs to be reviewed, rescinded, and decision-making

power handed over to community-based and Indigenous organizations working with Environment Canada and Health Canada experts (see recommendation one).

Sincerely,

~ [REDACTED]

[REDACTED]

Tehkummah, Ontario, Canada

[REDACTED]