



March 15, 2022

Mr. Jim Delaney
Director, Uranium and Radioactive Waste Division
Natural Resources Canada
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Sent via e-mail:

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The Regional
Municipality
of Durham

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Dear Mr. Delaney,

Re: Region of Durham Response to Canadian Radioactive Waste Draft Policy

Last May, Durham Region provided a submission to NRCan for the review of the Canadian Radioactive Waste Policy (attached), which was based on a report and recommendations approved by Durham Regional Council on May 26, 2021 (Report #2021-COW-09).

Although we appreciate that many of our recommendations were included in NRCan's recent "What We Heard" report, they are not reflected in the draft policy. As the host community of the Pickering Nuclear Generating Station, Darlington Nuclear Generating Station, the Port Granby Long-Term Waste Management Facility and a significant portion of Canada's radioactive waste, Durham Region is one of Canada's principal nuclear jurisdictions.

The Region of Durham has a significant interest in strengthening Canada's radioactive waste policy to ensure that it reflects the unique expertise and needs of host jurisdictions. Host communities understand the mandated and legislated duties of municipalities related to the nuclear sector and the long-term community benefits and impacts of radioactive waste minimization, storage, decommissioning and disposal. Notably, there is no mention of host jurisdictions in the draft policy.

Durham Regional Council's recommendations to NRCan included:

- i. Formal recognition of host jurisdictions as respected partners in delivering solutions for radioactive waste and in managing the decommissioning process;
- ii. Guidance for federal nuclear agencies and owners/operators of nuclear facilities on how and when to engage with host jurisdictions in accordance with the policy principles;

If this information is required in an accessible format, please contact
1-800-372-1102, [REDACTED]

- iii. Protection of host community well-being (health, social, economic and environmental) as a priority across all phases of a project that creates radioactive waste;
- iv. Federal funding for Durham Region, the Municipality of Clarington, the City of Pickering and the Canadian Association of Host Communities (CANHC) to support additional activities required of a nuclear host community and their participation in future licensing processes;
- v. Mechanisms to compensate nuclear host communities for hosting radioactive waste on an interim or long-term basis;
- vi. Clear definitions of interim storage and long-term storage;
- vii. Federal support in advance of plant closure, during safe storage and during decommissioning phases to mitigate economic impacts and assist the host community with economic diversification and renewal;
- viii. Meaningful engagement of existing nuclear host communities in the discussions about options for long-term waste management, including transportation methods and routes;
- ix. A mechanism for licensing decisions to consider the need for social licence and assess socio-economic impacts on the host jurisdictions;
- x. Management of nuclear waste as a consideration throughout the facility life cycle of a nuclear project from the earliest stages, designing for minimization and reduction from the outset; and
- xi. A focus on development of nuclear waste expertise to position Canada as a global leader and capable of capturing the international economic opportunities and addressing climate change goals.

Durham Region staff would appreciate the opportunity to further discuss our submission, and how our recommendations informed the draft policy. [REDACTED] will contact your office soon to find an appropriate time to meet.

Best regards,

[REDACTED]

[REDACTED]
[REDACTED]

cc. [REDACTED]
[REDACTED]
[REDACTED]

Attachment: Response by the Regional Municipality of Durham to the Natural Resources Canada Canadian Radioactive Waste Policy Review, May 31, 2021