



May 31, 2021

To: Natural Resources Canada
Nrcan.radwastereview-examnendechetsradioactifs.rncan@canada.ca

From: National Council of Women of Canada

Re: Canada's Radioactive Waste Policy Review

The National Council of Women of Canada (NCWC) considers nuclear power to be extremely dangerous throughout its life cycle and for thousands of years after. And, using our strong precautionary policies, democratically developed over many years, we have often presented our grave concerns to the Prime Minister, relevant Government Ministries, other Members of the Legislative Assembly, Environmental Assessment Panels, and government-delegated Commissions.

The NCWC therefore appreciates this opportunity to have input to the Natural Resources Canada (NRC) Radioactive Waste Policy Review. It is to be hoped that this review and subsequent Government actions will ensure the development of a strong, precautionary policy to deal with the steadily increasing, multiple, interconnected, and alarming issues of nuclear waste.

For, at every stage of the nuclear life cycle i.e., mining, nuclear reactor operation, waste reduction, decommissioning, transportation, storage, and disposal, should there be a release of radiation due to human error, nefarious actions, or natural disaster, there is the potential for great harm to the environment, public and worker health and safety, and broad community social and commercial activities, both immediate and far into the future.

Therefore, the NCWC, along with multiple Canadian organizations, independent scientists, and many thousands of individuals, is opposed to:

- Government support and promotion of nuclear as a key clean and green way to meet Canada's climate carbon reduction targets, rather than solar, wind, geothermal technologies, energy conservation, and efficiencies, along with carbon retention practices.
- Government support and funding of hundreds of millions of dollars to Canadian Nuclear Laboratories (CNL) for a contracted private-sector Consortium to construct a mega nuclear waste dump on lands close to the Ottawa river, which is subject to earthquakes and tornados.
- The Canadian Nuclear Safety Commission (CNSC) facilitation of small modular nuclear reactor (SMRs) proposals for potential use in hundreds of remote rural communities across Canada.

- Natural Resources Canada's promotion of same, and the Federal and New Brunswick governments' recent financing of a "start-up" company to build an experimental modular nuclear reactor and a facility to extract deadly plutonium from used nuclear fuel on the north shore of the Bay of Fundy.
- The government's exemption of small modular nuclear reactors from Environmental Impact Assessments.
- Natural Resources Canada's delegation of leadership for a consultation on Canada's Waste Management Plan to the makers of this waste, the Nuclear Waste Management Organization.

The NCWC therefore requests that Natural Resources Canada recommend to the Government of Canada that:

- Canada's new waste management nuclear policy be underpinned by the precautionary principle and feature strong regulatory measures.
- Indigenous peoples be consulted more closely on the Nuclear Waste Policy and subsequent Plan, and that the Five Principles of the Anishinabek/Iroquois Alliance be used as a guide.
- as recommended by the 1989-1998 Seaborn Environmental Assessment Panel, radioactive waste management be overseen by an agency that includes experts on environment, health and safety, social science, and is at arms-length from the nuclear industry, CNSC and government Ministries.
- IAEA standards be met. For example, "in situ" burial of reactors only be used in emergencies e.g., Fukushima disaster.
- NWMO not be allowed to promise, and/or provide, substantive and ongoing funding to potential nuclear projects requiring "community acceptance", again as noted by the Seaborn Commission.
- Radioactive waste is not abandoned and that Perpetual Stewardship be adopted and practised.

Sincerely,

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National Council of Women of Canada

The National Council of Women of Canada (NCWC) works in the spirit of truth and reconciliation, acknowledging Canada is the traditional territory of Indigenous and Metis People. We are grateful to join with others in peace and hope, advocating for an improved quality of life for women, children, families, and society.

C: Prime Minister Trudeau
The Honourable Jonathan Wilkinson, Minister of the Environment
The Honourable Patty Hajdu, Minister of Health
The Honourable Erin O'Toole
The Honourable Jagmeet Singh

**Note: The draft of this letter was prepared by [REDACTED] NCWC Environment
Convenor, using these NCWC policies on nuclear power:**

- In 1985 the National Council of Women of Canada urged the Government of Canada to establish an independent commission to investigate the safety of nuclear power as an energy source; and in 1997 NCWC updated its nuclear policy asking the Government of Canada to:
 1. reject as unsafe, the AECL “concept” for the burial of high-level nuclear wastes in the Precambrian shield; and
 2. initiate a public policy debate, with broad public consultation, on the energy future of Canada, with specific focus on the nuclear issue; and
 3. expend research moneys on a search for a safe technology to treat nuclear wastes; upgrading current nuclear-site safety; and developing alternative sources of energy efficiencies and conservation and,
 4. bring Canadian radiation exposure standards into conformity with those adopted by the International Radiation Protection Association of 1991, while encouraging the Association to improve these standards even further to reflect the gender and age differences of women and children; and,
 5. do all that is in its power to prevent the expansion of the nuclear industry.
- In 2004 NCWC updated its nuclear policy and urged the Government of Canada to ensure that there will be a full Federal/Provincial/Territorial Environment Assessment of the Nuclear Waste Management Organization (NWMO) recommendations, with allowance for intervener funding; and a full parliamentary debate with a free vote, on the NWMO and the Environmental Assessment final recommendations.
- In 2019 NCWC updated its nuclear policy and urged the Government of Canada to ensure good stewardship of nuclear waste through its safe storage above ground and under human control.