

February 28, 2021

Ms. Laurie Swami, President and CEO
Nuclear Waste Management Organization
22 St. Clair Avenue East, Sixth Floor
Toronto, Ontario M4T 2S3

Dear Ms. Swami:

We are writing to inform you directly of the reasons that environmental non-governmental organizations and other civil society groups are not engaging with the Nuclear Waste Management Organization in your process related to waste management strategies, per the Minister of Natural Resources announcement of November 2020. The Minister of Natural Resources has been similarly informed.

Our reasons for not participating in the NWMO "virtual summit" and other activities related to an NWMO-led development of radioactive waste management strategies include the following:

- 1. The radioactive waste policies should be developed before the radioactive waste management strategies are developed.** In November the federal government announced that they would review / develop radioactive waste management policy and strategies in response to an international peer review. Natural Resources Canada is leading the review of radioactive waste policy, and to date has launched a web site and posted four discussion papers. Public input continues until the spring (and we are urging an extension) and the policy review should be complete or at least the proposed policies released in draft before the strategy development begins.
- 2. The Nuclear Waste Management Organization's mandate is limited to nuclear fuel waste.** Established under the Nuclear Fuel Waste Act in 2002, the NWMO's mandate is limited to the development and delivery of a long term management option for high level nuclear fuel waste. The development of management strategies for non-fuel waste from activities such as uranium mining and processing, reactor decommissioning, and isotope production is outside the NWMO's legal mandate and scope of operations.
- 3. The nuclear industry should not be in charge of developing Canada's radioactive waste management strategies.** The NWMO is made up of Ontario Power Generation, Hydro Quebec and New Brunswick Power, the three provincial power companies that own nuclear reactors. Ontario Power Generation has majority control. A letter signed by over 100 public interest groups in [February 2021](#) outlined in more detail concerns with the current review of radioactive waste policy and radioactive waste management strategies, including the role of the nuclear industry.
- 4. The nuclear industry is already unilaterally developing an "integrated radioactive waste strategy".** This exercise began some years ago and is described in the Canadian 7th National Report for the Joint Convention on Spent Fuel Management which states that "*The first output of this industry-led exercise on preparing an integrated radioactive waste strategy is expected in 2020*", and there are many reports which make it clear that a group within the CANDU Owners have been working on this "Integrated Radioactive Waste Strategy" for a considerable time. We believe the NWMO process is simply a front for the industry-led exercise which has been underway for years.

5. The objective of the "virtual" summit the NWMO is planning for late March is to create a semblance of public engagement. The NWMO is planning a "virtual summit" from March 30th to April 1st, with day long banks of speakers and presentations. Some within our network have been invited as speakers, others as participants. Most if not all civil society organizations will refuse to participate in this online event for the reasons outlined above. But the NWMO's objective for the civil society sessions, as outlined in the draft agenda is to "*Demonstrate the active engagement of a multiplicity of voices early in the process.*" We will not assist the NWMO in making this claim. We are not at all persuaded that the NWMO is sincere in their efforts to engage the public or will be accountable in their disposition of public input.

We have communicated through our network that the invitation from the NWMO is for an exercise which is separate from the radioactive waste policy review that Natural Resources Canada launched in November. While we have been disappointed in some aspects of the NRCan review process, many of us are participating, and we will continue to do so. And while we are critical of the NWMO's "Adaptive Phased Management" program, including the NWMO's lack of transparency, many of us remain engaged in that process and interact regularly with NWMO staff and community liaison committees with respect to the siting process and the NWMO program related the long-term management of high level nuclear fuel waste.

Organizations and individuals will decide for themselves on their level and form of participation with the NWMO with respect to the development of draft radioactive waste management strategies. However, we think it appropriate to communicate to you that a low level of participation should in no way or manner be attributed to a low level of interest or expertise.

The undersigned represent major organizations in the Nuclear Waste Watch network. In the interest of openness and transparency we wished to communicate to you directly our decision and our reasons for not participating in the NWMO led exercise.

Thank you for your consideration.

Gordon Edwards, Canadian Coalition for Nuclear Responsibility
Theresa McClenaghan, Canadian Environmental Law Association
John Jackson, Citizens' Network on Waste Management
Susan O'Donnell, Coalition for Responsible Energy Development in New Brunswick (CRED-NB)
Ole Hendrickson, Concerned Citizens of Renfrew County and Area
Shawn-Patrick Stensil, Greenpeace Canada
Michael Poellet, Inter-Church Uranium Committee (ICUC)
Brennain Lloyd, Northwatch
Angela Bischoff, Ontario Clean Air Alliance
Ginette Charbonneau, Ralliement contre la pollution radioactive

Please direct reply correspondence to nuclearwastewatch@gmail.com for distribution to the signators listed above.

cc. Paul Lefebvre, Parliamentary Secretary to the Minister of Natural Resources
Shawn Tupper, Associate Deputy Minister, Natural Resources Canada
Mollie Johnson, Assistant Deputy Minister, Natural Resources Canada
Jim Delaney, Director, Uranium and Radioactive Waste Division, Natural Resources Canada
Members of Federal Cabinet

Greg McLean, Natural Resources Critic, Conservative Party
Richard Cannings, Natural Resources Critic, New Democratic Party
Mario Simard, Natural Resources Critic, Bloc Québécois
Elizabeth May, Parliamentary Leader, Green Party of Canada
Dan Albas, Environment Change and Climate Critic, Conservative Party
Laurel Collins, Environment Change and Climate Critic, New Democratic Party
Monique Pauzé, Environment Change and Climate Critic, Bloc Québécois