

April 1, 2021

The Honourable Seamus O'Regan
Minister of Natural Resources
House of Commons
Ottawa, Ontario K1A 0A6

Sent by email

Dear Minister O'Regan:

Re: Engagement of Public Interest Groups in Canada's Review of Radioactive Waste Policy and Development of Radioactive Waste Management Strategies

Thank you for your letter of March 22nd, in response to the letter signed by over 100 civil society organizations and sent to you and the Prime Minister on February 8th outlining for you our expectation that the Review will ensure that the public interest is fully considered.

We wish to continue by this correspondence our discussion with you in two important areas: our engagement in the radioactive waste policy review, and our strong objections to the role that has been assigned to the Nuclear Waste Management Organization (NWMO) in the development of radioactive waste management strategies.

First, we want to thank you and your department for the adjustments you have made to the engagement process, as outlined in your letter. The extension to May 31st for this phase of public engagement is very welcome, and we are in discussion with your staff about the scheduling of the remaining two (of four) environmental / civil society sector roundtables based on this revised timeline. We also wanted to share with you that your staff responded very positively to participant feedback on the first roundtable, and for the second roundtable there were important changes in place, including the provision of simultaneous translation, an improved online platform, an extended time allocation, and greatly improved facilitation.

Thank you for confirming that there will be an opportunity for public comment on a "What We Heard" report at the end of this phase of your engagement process, and that a draft policy will then be released for public comment. These are important steps in this review and will help build confidence in the review outcomes.

Your confirmation that information you receive through public discussion forums, online forms, and formal submissions will be made available on the virtual engagement hub website is also appreciated, and we look forward to those additions being made to the engagement web site.

As you will be aware, currently only comments made through the online “virtual forum” function are available, and we are very pleased to hear from you of the addition of a registry through which all submissions and engagement reports will be available. This is an important step towards process transparency.

We were also very pleased to receive your assurance in your letter of March 22nd that protecting the health and safety of Canadians and the environment is the Government’s top priority when it comes to nuclear energy, and we truly look forward to seeing this commitment reflected in the review outcomes.

With respect to your response to our comments to you of February 8th that radioactive waste management strategies should be the product of the engagement of Indigenous peoples, the Canadian public and civil society with the Government and that - specifically - strategies should not be formulated by the Nuclear Waste Management Organization, you write that “the Nuclear Waste Management Organization (NWMO)... has been asked to work with waste owners and engage Canadians to develop a comprehensive integrated strategy to address all categories of radioactive waste. As Minister of Natural Resources, I asked the NWMO to lead the dialogue and develop an integrated strategy for radioactive waste, which would then be submitted to me for consideration” and indicate that you consider this to be “complementing the Government of Canada’s process”. You then encourage us to participate in the NWMO process.

On February 28th we wrote to Laurie Swami, President and CEO of the NWMO, to inform her directly of the reasons that environmental non-governmental organizations and other civil society groups are not engaging with the Nuclear Waste Management Organization in their process related to waste management strategies, per the Minister of Natural Resources announcement of November 2020. We copied you on that letter and have attached it again as reference. In summary of our concerns, we wish to impress upon you that an exercise carried out by the Nuclear Waste Management Organization is not a legitimate means for your government to develop strategies for the management of radioactive waste, and the NWMO is not a credible body to carry out such consultations.

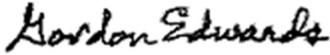
In brief, our reasons include: the development of an integrated radioactive waste strategy is outside the Nuclear Waste Management Organization's mandate; the nuclear industry should not be in charge of developing Canada's radioactive waste management strategies; and the nuclear industry is already unilaterally developing an "integrated radioactive waste strategy", and the NWMO presentation of their March 30th-April 1st summit as a starting point for the development of strategy is wholly disingenuous.

Finally, and perhaps most importantly, it is the Government of Canada that committed to the development of radioactive waste management strategy, as you expressed it in February 2020. It is not the role of the nuclear industry. Your government has repeatedly stated that it wants to regain the trust and confidence of Canadians in regulatory processes; delegation of radioactive waste strategy development to the companies that produce and own the waste will have the opposite effect.

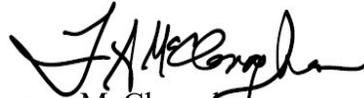
We are willing partners and participants in not just the current review of radioactive waste policy but also in the development of radioactive waste management strategies. We look forward to engaging with the Government of Canada in this important strategy development.

In closing, we wish to thank you for taking the time to meet with us and engage in discussion of this important review on February 25, 2021. We also found it to be a productive session, and we remain available and would welcome the opportunity to meet with you again in the near future.

Sincerely,



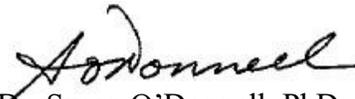
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Canadian Coalition for Nuclear Responsibility



Theresa McClenaghan
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Brennain Lloyd
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Ginette Charbonneau, Physicist
Ralliement contre la pollution radioactive

Chief Duncan Michano
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cc. Prime Minister Justin Trudeau
Mollie Johnson, Assistant Deputy Minister, Natural Resources Canada
Shawn Tupper, Associate Deputy Minister of Natural Resources Canada
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Members of Federal Cabinet
Greg McLean, Natural Resources Critic, Conservative Party
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