

February 8, 2021

Hon. Justin Trudeau Prime Minister of Canada Hon. Seamus O'Regan Minister of Natural Resources

Dear Sirs:

Re. Expectations of Public Interest Groups Regarding Canada's Review of Radioactive Waste Policy and Waste Management Strategies

On November 16th 2020 Natural Resources Canada (NRCan) launched a review of Canada's Radioactive Waste Policy. We write now to inform you of our expectation that the Review will ensure that the public interest is fully considered.

To date, NRCan has populated a <u>web site</u>, posted <u>four discussion papers</u> and comment forums, and held one by-invitation "information session" and a number of bilateral conversations with civil society organizations and others in December 2020.

As public interest groups, many with considerable expertise in nuclear waste management, we consider this Review to be of utmost national importance. The outcomes of the Review process will impact not only the current generation of Canadians but also generations to come. As we have communicated with NRCan staff and in earlier letters to you as Prime Minister of Canada and as Minister of Natural Resources, we have <u>serious concerns</u> about the shape of the review as announced to date.

In particular, a timeline with March 31, 2021 for the end of public engagement is unreasonable and unacceptable. Most Canadians have not yet even been made aware of this review and its farranging implications. At the very least, Canadians must be given notice of the Review process and opportunities to participate.

Our expectations for the review of Canada's radioactive waste policies and the development of radioactive waste management strategies are as follows:

- 1. The process will be open and transparent and publicized to all Canadians, through a variety of media, from coast to coast to coast.
- 2. All Canadians will be given equal opportunities to participate in the Review process. To avoid conflict of interest, the nuclear industry will not be afforded privileged opportunities to affect process outcomes or to influence policy decision-makers.
- 3. The process will only move forward with the participation of Indigenous peoples, who are engaged in a manner and on a timeline determined by those Indigenous peoples who choose to participate.
- 4. The resulting policy will be the product of the engagement of Indigenous peoples, the Canadian public and civil society with the Government of Canada; the engagement

- practices for the review process must reflect this. For example, a reasonable timeline would not be expected to produce outcomes prior to 2022.
- 5. Resulting strategies will be the product of the engagement of Indigenous peoples, the Canadian public and civil society with the Government. Specifically, strategies will not be formulated by the Nuclear Waste Management Organization.
- 6. Protection of health and the environment will be at the forefront of and embedded in the Review process as well as the resulting radioactive waste policies and radioactive waste management strategies.
- 7. The review process will be iterative, and include comment on discussion papers, open comment opportunities, a feedback period on "What We Heard" reports, and a comment period on resulting draft policies and draft strategies.
- 8. The outcome strategies will address all categories of radioactive wastes and include timelines and budgets.
- 9. The process outcomes will be determined by the Government of Canada.
- 10. The establishment of the resulting policies and strategies must be the result of a multidepartmental process and not the sole domain of Natural Resources Canada.

As you are aware, the current review is responding to recommendations from the International Atomic Energy Agency's Integrated Regulatory Review Service peer review of Canada's radioactive waste policies in 2019. The IAEA found Canada's policies and strategies for the management of radioactive waste to be inadequate.

Canada's response to the IAEA findings is a litmus test of this Government's earlier commitments to restore Canadians' trust in our democracy and to ensure an open and transparent government.

Now is the moment to take action to correct the course of this review process. We remain available for further clarification or detailing of the above and would be pleased to meet at your convenience. We look forward to your response to our expectations.

Sincerely,

Action Climat Outaouais - Québec Réal Lalande Action Environnement Basses-Laurentides Lucie Massé Algonquin EcoWatch (formerly) Mke Wilton

Association québécoise de lutte contre la pollution Jocelyne Lachapelle

atmosphérique

Biigtigong Nishnaabeg

Bonnechere River Watershed Project Canadian Association of Physicians for the Environment

Canadian Association of Physicians for the Environment Canadian Coalition for Nuclear Responsibility

Canadian Council on Food Safety and Health Canadian Environmental Law Association

Canadian Peace Research Association

Canadian Voice of Women for Peace Centre de recherche en éducation et formation relatives Duncan M Michano Kathryn Lindsay Cathy Vakil

Gordon Edwards Ken Billings

Theresa McClenaghan

Anne Venton Vanessa Lanteigne Isabel Orellana à l'environnement et à l'écocitoyenneté, Université du Québec à Montréal

Citizens Against Radioactive Neighbourhoods

Citizens Environment Alliance of Southwestern Ontario

Citizens' Network on Waste Management

Clean North

Coalition Against Nuclear Dumps on the Ottawa River

Coalition for a Clean Green Saskatchewan

Coalition for a Nuclear Free Great Lakes

Coalition for Responsible Energy Development - New

Brunswick

Comité des Citoyens et Citoyennes pour la Protection de

l'Environnement Maskoutain

Committee for Future Generations Concerned Citizens of Hornepayne Concerned Citizens of Manitoba

Concerned Citizens of Renfrew County and Area

Concerned Citizens of Saint John

Provincial Council of Women of Quebec

Council of Canadians

Council of Canadians, Fredericton Chapter Council of Canadians, Ottawa Chapter

Council of Canadians, Peterborough and Kawarthas

Council of Canadians, Regina Chapter Council of Canadians, Saint John Chapter

Council for Public Health in Mining Communities

County Sustainability Group
Durham Nuclear Awareness

Eau Secours

Environment North Espace Humain

Extinction Rebellion New Brunswick

Fédération des travailleurs et des travailleuses du

Québec

Federation of Ontario Cottagers' Associations Friends of Peacebuilding and Conflict Prevention

Friends of the Earth Canada Green Coalition/Coalition Verte

Greenpeace Canada

Greenspace Alliance of Canada's Capital

Hiroshima Nagasaki Coalition

Indigenous Solidarity Working Group/UJPO-TO Inter-Church Uranium Committee Educational

Cooperative

International Physicians for the Prevention of Nuclear

War Canada

Jane Scott

Derek Coronado John Jackson

William G. Cole Eva Schacherl

David Geary

Michael J. Keegan

Ann McAllister

Annabelle T.Palardy

Candyce Paul Sandra Fraser

Dave Taylor

Ole Hendrickson

Paula Tippett

Elizabeth Hutchinson

Mark Calzavara Gail Wylie

Janet Graham

Roy Brady Jim Elliot

Leticia Adair

Sue Moodie Don Ross

Gail Cockburn

Rébecca Pétrin

Graham Saunders Helene Tremblay

Jessica Spencer

Denis Bolduc

Terry Rees

Richard Denton

Beatrice Olivastri

Gareth Richardson

Shawn-Patrick Stensil

J. P. Unger

Rosemary Keenan

Ann Pohl

Michael Poellet

Vinay Jindal

JustEarth

Lake Ontario Waterkeeper

Le regroupement des citoyens de Saraguay

Leap4wards Saint John MiningWatch Canada

National Council of Women of Canada

Nipissing Environmental Watch North Bay Peace Alliance

Northwatch

Old Fort William Cottagers' Association

Ontario Clean Air Alliance

Ontario Nature

Ottawa Raging Grannies Ottawa River Institute

Ottawa Water Study/Action Group

PEACE-NB

Petawawa Point Cottagers Association Pontiac Environment Protection

Port Hope Community Health Concerns Committee

Prevent Cancer now

Protect Our Waterways - No Nuclear Waste Provincial Council of Women of Ontario Ralliement contre la pollution radioactive

RAVEN project, University of New Brunswick Recherche Indépendante de Retraitée en Écologie Regroupement des organismes environnementaux en

énergie

Regroupement pour la surveillance du nucléaire Regroupement vigilance hydrocarbures Ouébec Réseau québécois des groupes écologistes Saskatchewan Provincial Council of Women

Saskatoon Peace Coalition

Science for Peace

Seventh Generation Initiative Sierra Club Canada Foundation

Sierra Club Canada Foundation, Atlantic Canada

Chapter

SOS Great Lakes

Sustainable Energy Group

Temiskaming Environmental Action Committee

The Inverhuron Committee UNIFOR 6001 Québec

United Jewish People's Order - Canada

Voices for Sustainable Environments and Communities

WaterCare Allies, First United Church Ottawa

Dorothy.Goldin Rosenberg

Mark Mattson Sylvia Oljemark David Thompson Jamie Kneen Patricia Leson John Patterson Deb Sullivan Brennain Lloyd Johanna Echlin Angela Bischoff Julee Boan Jo Wood

Maryanne MacDonald

Lynn Jones

Sharon Murphy Kirk Groover Deborah Powell Faye More Meg Sears Bill Noll **Edeltraud Neal**

Ginette Charbonneau

Gilles Provost Susan O'Donnell Jean-Paul Bourque Laurence Leduc-Primeau

Jacques Boucher Odette Sarrazin Chantal Levert Randi Arnot Anne Brander Robert Acheson Mike Nickerson

Gretchen Fitzgerald

Tony Reddin

Jill Taylor Sam Arnold **Ambrose Raftis** Marti McFadzean Raymond Thibert Rachel Epstein Rick Cheeseman Judith Miller

Watershed Sentinel Educational Society Women's Healthy Environments Network Anna Tillman Cassie Barker

This letter has been endorsed by:

Jenica Atwin, Member of Parliament, Fredericton Green Party of Canada

Richard Cannings, Member of Parliament, South Okanagan- New Democratic Party of

West Kootenay Canada

Monique Pauzé, Députée, Repentigny Bloc Québécois

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

cc. Paul Lefebvre, Parliamentary Secretary to the Minister of Natural Resources
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