Deputation to Township of Council
April 23, 2024
by
Dodie LeGassick and Mary Veltri

on Behalf of

We the Nuclear Free North and Environment North

RE: Concerns About Nuclear Waste in Northwestern Ontario

Thank you for allowing us to speak to you this evening about a matter that could have serious negative impacts on your community – its residents and the surrounding environment - for generations to come. We represent WTNFN, an alliance of people and groups, including Environment North, who oppose a Deep Geological Repository for nuclear waste in Northern Ontario. We are also board members of Environment North, an NGO in operation since 1972, which conducts research, education and community advocacy to promote sustainability, protection of the environment and community engagement in decisions impacting the environment.

We, along with a growing number of communities and First Nations and most recently, the Council of Canadians, oppose the transport, burial and abandonment of radioactive nuclear waste in our northern watersheds, as proposed by NWMO. We continually challenge the NWMO to honestly address the risks associated with this proposal and to adopt a broader consultation process that would include all of the communities along the transportation route in their assessment of "willingness".

We are here today to address our concerns about the NWMO process to establish a deep geological repository (DGR) at Revell Lake located in the Wabigoon Lake Ojibway Nation- Ignace area in northwestern Ontario and the risks associated with transportation of used nuclear fuel waste through your community. We are asking you to consider passing a resolution that supports our campaign to stop the NWMO from proceeding with their northwestern Ontario option.

I would like to first address our concerns with the NWMO and its site selection process. Dodie will be addressing the transportation issues.

1. **The Nuclear Waste Management Organization Prioritizes Nuclear Industry Interests**

The Nuclear Waste Management Organization has been mandated to design, construct and operate a repository, as well as design and implement a site selection process. It was established in 2002 under the ***Nuclear Fuel Waste Act***. The Nuclear Industry founded the NWMO and the NWMO's Board members and advisory council are all appointed by the three

nuclear energy corporations (Ontario Power Generation Inc., Hydro-Quebec and New Brunswick Power Corporation).

Prior to the establishment of the NWMO, the federal government had established an expert panel to oversee an environmental assessment of the Geologic Disposal Concept for High Level Radioactive Waste. In 1998, after a 10-year review of evidence and submissions from public hearings, the Panel concluded that the Canadian public did not support the concept of burying nuclear waste and recommended that a neutral, nuclear fuel waste management agency be created, at arm's length from the utilities and AECL (Atomic Energy of Canada Ltd.)

The federal government ignored this key recommendation and instead tasked the industry-controlled Nuclear Waste Management Organization with the responsibility to design and implement a plan for the long-term storage of high-level radioactive waste.

Currently, Canada's active and decommissioned nuclear power plants, located in Ontario, New Brunswick, Quebec and Manitoba, have produced over the past 60 years a stockpile of approximately 3.3 million spent nuclear fuel bundles that increases at a rate of about 90,000 bundles per year (NWMO). If all the currently operating plants live out their licensed lifetimes, they will have to dispose over 6 million fuel bundles. With the NWMO's ever changing plans, it is expected that the high-level radioactive waste from Small Modular Reactors will also be added to the proposed DGR.

Naturally, the industry-led NWMO is keen to bury and abandon the nuclear waste in a remote place so that they can proceed with their plans for expansion of nuclear power despite all the negative impacts caused by the nuclear fuel chain.

Rather than holding wide public consultations, the NWMO's process has been fundamentally unfair and exceedingly partial to what the industry wants. Given the long- term health and environmental risks associated with nuclear waste, we believe broader more inclusive consultation must take place, one that respects the principles of free, prior and informed consent for Indigenous people and includes all potentially impacted people.

2. Inadequacy of Canadian Nuclear Safety Commission

The Canadian Nuclear Safety Commission is the licensing body that is ostensibly in place to regulate the nuclear industry and ensure public safety. Once the NWMO completes its site selection process, it will need to apply for a license from the CNSC. However, the CNSC has repeatedly come under criticism for allowing nuclear operators to violate safety standards and their licence requirements.

One might expect that the NWMO's plans concerning the transportation of nuclear fuel waste, the containers, the repository design are vetted and scientifically vetted and overseen. The Canadian Nuclear Safety Commission (CNSC) is the regulator, so one would think that it

carefully reviews the NWMO's technical plans, and uses its power to say yes or no to them. However, this is not the case.

The CNSC follows the nuclear industry's lead. Rather than setting safety standards, the Commission merely reviews whether the industry is following its own rules. And even when the industry breaks its own rules, as was on the news recently in the case of the Canadian Nuclear Laboratories buried reactor at Pinawa, CNSC will issue relatively small fines. CNSC has never withheld a licence to a nuclear facility. As a result, the CNSC is often referred to as a "captured regulator".

This unfettered delegation of power to the NWMO, without government oversight, has enabled the NWMO to design its own processes for consultations, determination of "willingness" and definition of "host community. We therefore suspect that the CNSC licensing process will simply be a rubber stamping of the NWMO decision

3. Lack of Consultation with Communities Directly Affected by the Proposal

Environmental justice requires that the people who are affected by a decision ought to be consulted. Despite living along the transportation route where Schreiber residents will have daily exposures of gamma radiation from the transports or train cars carrying nuclear waste, your community, has not been directly engaged in a consultation process. Your community will also be exposed to the risk of catastrophic harm resulting from an accident or military attack. It is not fair that residents along the route have been excluded from the willingness process, not informed of the risks, nor given a say in the process.

It is only Ignace and Wabigoon Lake Ojibway Nation who will decide for all of us in northwestern Ontario whether there is willingness to have the DGR sited in our region. Interestingly, the Revell Lake site is not even within the town boundaries of Ignace nor within its watershed. Communities closer to the proposed site and living downstream have also been excluded from the consultation process.

We believe a proposal with the potential for this magnitude of regional impacts should not proceed without regional input, particularly from communities along the transportation route and downstream from the proposed site.

4. Willingness Process

The NWMO has stated that they will only proceed in an area with "willing and informed hosts." Willingness suggests consent is freely given. However, the power imbalance between the nuclear industry and the small, regionally-isolated and economically-marginalized community of Ignace with a population of 1,200 is huge. This raises many ethical questions.

The NWMO has deep pockets (funded by utility ratepayers) and has been trying to buy consent by pouring cash into Ignace to engage and seek their support. In 2023 alone Ignace received

$1.7 million for local projects and infrastructure as part of their funding agreement. To date, they have received an estimated $10 million with millions more promised with the signing of the hosting agreement.

Similarly, “informed” implies that the community has received information about the risks and benefits of being a host community. However, the NWMO materials do not address any of the risks associated with their proposal or the harms associated with radioactive exposure and contamination. The NWMO plan to transport, process and bury high-level nuclear waste is not a complete plan. It includes a number of ‘concepts’ which are still being developed, and there are large gaps in the information**.** How can the residents be informed about a plan that lacks concrete details and material facts?

5. Environmental Justice

A fundamental principle of environmental justice is that environmental benefits and burdens should be equitably distributed among all persons, rather than allowing the majority of adverse impacts to be unfairly imposed upon visible minorities, Indigenous and/or marginalized communities. We oppose the imposition of a repository for all of Canada’s nuclear waste in northwestern Ontario because we do not rely on nuclear energy as a source of electricity. Northwestern Ontario’s energy supply comes from hydro, biomass, solar and wind. It is Southern Ontario and New Brunswick that have relied on and reaped the benefits from nuclear energy. In keeping with the proximity principle, and environmental justice, the nuclear waste ought to be stored as close to the site of generation as possible.

Finally, there are many uncertainties about the whether the repository will be able to prevent radioactive materials leaking out into the water and earth over the hundreds of thousands of years for which they will remain hazardous. There are many unanswered questions about the properties of the fuel over such immense time frames, the behaviour of the geological formations, the ability of human technology to withstand environmental pressures over decades, much less thousands and hundreds of thousands of years and the possibility of cataclysmic events. While our generation may not experience the negative consequences of this plan, it is an intergenerational injustice to burden people not yet born with the impacts caused by burying radioactive waste.