
From: Barry Stemshorn <personal information redacted>
Sent: December 20, 2019 5:41 PM
To: Seamus.OREgan@parl.gc.ca
Cc: Andrew.Hayes[personal information redacted]; Consultation (CNSC/CCSN);
ministre-minister.ec@canada.ca; Marilyn.Gladu@parl.gc.ca;
Luc.Berthold@parl.gc.ca;don.davies@parl.gc.ca; Alistair.MacGregor@parl.gc.ca;
Elizabeth.May@parl.gc.ca;Greg.Fergus@parl.gc.ca
Subject: On-site Disposal of Nuclear Wastes at Legacy Reactor Sites
Attachments: Minister O'Regan signed.pdf;

Dear Minister O'Regan

I enclose for your consideration a letter on the above mentioned subject. Two copies are provided, one signed and the second with live links to cited sources.

Thank you for your attention to this matter.

Yours sincerely,

Barry Stemshorn

1. signed copy:

[personal information redacted]

December 20, 2019

Dear Minister O'Regan,

Re: On-site Disposal of Nuclear Wastes at Legacy Reactor Sites

The Executive Director of the International Energy Agency has stated that "Alongside renewables, energy efficiency and other innovative technologies, nuclear can make a significant contribution to achieving sustainable energy goals and enhancing energy security"¹. This goal can only be achieved if the nuclear sector and its waste legacy is effectively managed in the public interest.

My confidence in the management of this sector in Canada has been undermined by questions about the adequacy of nuclear governance that were presented to your predecessor and his colleagues earlier this year through a petition to the Commissioner of Environment and Sustainable Development². Contrary to the picture set out in the Ministers' reply, the International Atomic Energy Agency (IAEA) subsequently reported weaknesses in policy and adherence to international standards³ that echo concerns raised in this petition.

As a case in point, the nuclear industry and the Canadian Nuclear Safety Commission (CNSC) are proposing to use legacy nuclear reactor sites for on-site disposal of nuclear wastes. Approving nuclear plants as waste sites would appear to ignore Canada's responsibilities as a signatory to the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management that requires Canada to pay "due regard to internationally endorsed criteria and standards". CNSCs draft "regulatory document" on decommissioning proposes on-site disposal of decommissioning wastes at nuclear reactor sites in violation of the IAEA's safety standards on decommissioning. I therefore urge you to halt this proposal.

As Minister of Natural Resources, I also encourage you to develop and ensure the implementation of nuclear waste policies in the best interests of Canadians and in accordance with IAEA international standards. This is a government responsibility and should not be

¹ <https://www.iaea.org/publications/nuclear/>

² see petition No. 427 at: [https://www.oag-bvg.gc.ca/internet/English/pet fs e 929.html](https://www.oag-bvg.gc.ca/internet/English/pet_fs_e_929.html)

³ <https://www.iaea.org/newscenter/pressreleases/iaea-mission-recognizes-canadas-commitment-to-safetv-sees-areas-for-enhancement>

delegated to an "independent" nuclear industry regulator described as "benign"⁴ and captive to industry interests⁵.

We need sound policies and a robust regulatory regime to deal with our toxic nuclear waste legacy. These policies must respect the rights of Indigenous peoples, incorporate the best-available scientific information, ensure responsible governance and uphold and respect Canada's international obligations.

Sincerely,

A handwritten signature in blue ink that reads "Barry Stemshorn". The signature is written in a cursive, flowing style.

Barry Stemshorn
Honorary Senior Fellow
University of Ottawa

⁴<https://docs.google.com/viewer?a=v&pid=sites&srcid=ZGVmYXVsdGRvbWFpbmVuc3JiYXxneDovNmVkNDUxOVRkNTkzY2Y5>

⁵ Expert Panel Report: Building Common Ground: A New Vision for Impact Assessment in Canada:
<https://www.canada.ca/en/services/environment/conservation/assessments/environmental-reviews/environmental-assessment-processes/building-common-ground.html>