



May 31, 2021

Cc The Honourable Seamus O'Regan, Minister of Natural Resources
The Rt. Honourable Justin Trudeau, Prime Minister
The Honourable Jonathan Wilkinson, Minister of Environment and Climate Change
The Honourable Maryam Monsef, Minister of Rural Economic Development

By email to Natural Resources Canada

Re: modernized Radioactive Waste Policy

Dear Natural Resources Canada,

We write today on behalf of Ontario's waterfront property owners, and to express our support for the responsible long-term management of our nuclear waste and co-products.

Our members have a long-term commitment to stewarding our freshwaters for future generations. We look to our government to deliver this same commitment to safeguard our families, and our precious waters, and our future, through the responsible management of all radioactive materials.

In summary, FOCA agrees that a path forward must at a minimum incorporate the following principles:

- Canada needs an independent agency, arms-length from government and industry, to oversee radioactive waste management and decommissioning
- Radioactive waste should NOT be abandoned; policy should direct perpetual care and monitoring
- Government and industry must be open and transparent in the management of radioactive waste and its transportation; Canadians have a right to access information, to engage in decision-making, and to know the risks
- There should be no importing of radioactive waste from other countries

In terms of specific policy topics listed by NRCAN, FOCA provides the following specific input:

WASTE MINIMIZATION

- Waste characterizations and inventories must be detailed, current, and peer / public reviewed and accessible
- Detailed tracking of all radioactive materials, including (very) low level radioactive wastes

WASTE DISPOSAL

- The notion of “disposal” should be replaced by an approach of long-term care and stewardship
- Independence and transparency should be integrated throughout the radioactive waste policy
- Agencies responsible for radioactive waste research and oversight should be independent of the nuclear industry
- Canada’s nuclear regulator should report directly to parliament
- The public should be engaged in policy and project development and review, with funded access to legal and technical advisors and all relevant documentation

WASTE STORAGE

- Design, operations and monitoring for fuel waste storage systems should be open and transparent, and include public access to information
- Storage systems should be designed to minimize risk and maximize protection of human health and the environment
- Waste storage systems should be passively safe, and should be “hardened” against extreme weather and malevolent acts

DECOMMISSIONING

- Decommissioning approaches must at minimum conform to international safety standards.
- Decommissioning planning and implementation should be information based, including all required information about the condition of the site (such as contamination of soil, ground or surface water) and a full inventory of radioactive wastes
- Information must be publicly available and peer reviewed
- All decommissioning projects must include a comprehensive strategy for the transmission of information and knowledge to future generations
- End-state objectives should be based on ecological and human health and the decommissioning work must show that the site has been fully remediated and is fully safe

We appreciate all your efforts to keep us safe, and trust you will find this input of value as you work towards a more robust and comprehensive approach to the management of these materials.

Many thanks for your consideration, and we look forward to your response at your earliest convenience.

Sincerely,



Terry Rees, Executive Director
On behalf of
Federation of Ontario Cottagers’ Associations, Inc.

FOCA is an Ontario association of over 500 community groups and represent the interests of the 250,000+ waterfront landowners who collectively contribute over \$800 million each year in property taxes, and who collectively own 15,000 kilometres of freshwater shorelines and 50,000 hectares of environmentally important lands.