

The Métis National Council

Response to the Nuclear Waste Management Organization's Report

“Choosing a Way Forward: The Future Management of Canada's Used Nuclear Fuel”

As an addition to the consultative process with the Métis National Council (MNC), the Nuclear Waste Management Organization (NWMO) has asked the Métis Nation to provide feedback on their draft report: *“Choosing a Way Forward...”*, and answer the following three questions concerning their recommended approach; i.e. Adaptive Phased Management:

- Is the recommended approach appropriate for Canada?
- What are the conditions required to successfully implement the approach?
- What special Aboriginal insights and/or concerns should be kept in mind by NWMO as implementation proceeds?

Before providing feedback there are a few areas that the Métis Nation would like to address concerning NWMO's report, or more specifically, what is not in the report.

First we believe that the mandate of the NWMO should have been broader to take into account such issues as: whether to continue the use of *nuclear fuel*; *discuss alternatives to nuclear energy and the role NWMO could play in supporting alternatives*; *the full nuclear fuel cycle*; and, *the disposal of nuclear waste other than from power plants*. Also, the report does not clearly identify mechanisms for involving stakeholders in the decision making process. We believe that engagement is more than just consultation, it is active involvement. It is important that representatives from the Métis Nation, as well as the other Aboriginal Nations, are represented on decision making boards and have a say in decisions that shape the way forward.

- Across the Metis Nation we very clearly heard that we should not be using Nuclear Energy as a source of energy. According to our questionnaire results, 74% of Métis participants felt that Canada should not use the nuclear option. They suggested halting production at current nuclear energy sites and not building any new reactors. One participant stated, “Just stop producing it, and those provinces/ areas that are participating in the production of nuclear energy should store the waste on site and not ship it to another community. Leave it where it's produced.” However, we realize that this is not possible as the current investment in nuclear technology is too high, and the electricity produced by current power plants

cannot be substituted by another source if production were to immediately cease. Nevertheless, this does not prevent exploration of other alternative sources of energy to eventually replace the nuclear option. We believe that it would be to the advantage of all stakeholders for NWMO to support research on alternative energy sources and facilitate their adoption. What this would show is a nuclear industry that is aware and willing to take steps to reduce the waste problem.

- Conservation and alternative energy were both suggested as possible options to meeting escalating energy demands. Participants commented that current energy consumption rates are not sustainable. Instead of creating new nuclear power plants to meet the demand, which is likely to occur, we should strive to reduce our energy consumption. In addition to conservation, further research needs to be conducted on alternative, non-polluting, sustainable energy sources like wind and solar power.
- Participants questioned why Canada allowed the construction of nuclear power plants in the first place without a plan for the disposal of used nuclear fuel? According to one participant, “Why start something and not think it through from the beginning to the end. Now look at what they have created - a virtual walking time bomb.” Provinces, and especially marginalized communities, that do not use nuclear energy should not be asked to bare the burden of disposing used nuclear fuel unless acceptable consultation, mitigation and accommodation occur. This does not mean accepting short-term gain at the expense of long-term safety. A decision on who hosts a disposal facility should not be left to a willing community alone, but all those that might be impacted by its operation and maintenance, including those communities along the route that the waste must pass to get to that facility.
- Concerns raised included the intent of the consultation process and other issues involving the importation of nuclear fuel waste not mentioned in the report. For example, possibilities of an increased demand for the disposal of “nuclear” byproducts, as well as the state of affairs in countries where Canada has sold CANDU reactors. In addition, a major concern, especially in this era of terrorism, is the exportation of nuclear fuel to countries where there is no appropriate security in place for the safe storage of the waste. Might Canada be requested by the international community to take back nuclear fuel waste, especially if we have the means to do so? Will obtaining public acceptance of a method of disposal justify the expansion of the nuclear option rather than accelerate its phase out? Also, how will the waste be transported and what safeguards are in place to prevent an accident?

With all this considered, we realize that we have to deal with the current nuclear waste reality, understanding that nuclear energy is not a source of energy Métis are familiar with nor comfortable about. In the past, during the early days of uranium mining, damage was done, and the memory of unfortunate events has not gone away. All things considered, deep geological disposal is nothing more than sophisticated burial. We don't

want to unknowingly submit to similar mistakes in the future. We therefore advocate going slowly, continually investigating new energy options and disposal methods, realizing that there is the fear that after a few centuries, after governments have come and gone, and after a whole host of social and economic changes have occurred, the resources needed to properly manage a disposal facility and the knowledge required to understand the dangers involved in handling this waste, might be lost forever.

Responding to the questions below does not mean that we endorse this option.

Adaptive Phased Management

1. Is the recommended approach appropriate for Canada?

Yes, it best reflects the Metis world view. If properly managed, and if all recommendations are complied with, it identifies and addresses concerns about environmental insurances; it looks at and takes into consideration community consultations, looks at site issues, is not driven by time nor money, but rather by results.

For example: Métis participants were asked to rank issues they are “...most concerned with in relation to nuclear fuel waste once a concept and potential site are chosen.” In order of importance, the issues were:

1. Human health;
2. Environmental security;
3. Security at the site;
4. Responsibility for the site;
5. Transportation; and,
6. Cost efficiency of concept

We emphasize that the project should be result driven not timeline driven. As for example it may not take 30 years to achieve a desired result. It could be less or it could be more depending on many factors. It needs to be made clear that timelines may not fit the situation and are only to be used as estimated targets.

2. What are the conditions required to successfully implement the approach?

If money and time are not the drivers, the environment and people’s health should be the priority.

Conditions:

- Research issues: Research needs should drive the funding, not visa versa. There should be an independent body to examine all possible environmental and cultural effects. Research needs to be of the highest quality, and needs to be repeated to verify results. Métis people should be appointed to research committees that determine research needs and

monitor progress. Research topics should focus on social, cultural, health, technology, and climate issues, etc. However, we still maintain that extra effort should go into the search for an alternative to nuclear power and methods to reuse and/or detoxify (neutralize) nuclear fuel waste.

- Environmental and cultural differences: Aboriginal people need to be involved from the beginning. It must be understood that Aboriginal culture is different, that Aboriginals live for the most part off the land. Like many cultures, Aboriginals do not want to lose their traditions, which are linked to the environment. Land and treaty rights must be respected. The capacity for respecting aboriginal rights and treaty rights must be incorporated in the overall management plan.
- Monitoring schemes: There must be a system put in place that addresses Aboriginal concerns, like the fear expressed by Métis hunters and fishermen that their sources of food will become contaminated. Routine sampling and testing would help reduce these fears. The psychological impact of knowing that living near a source of invisible radioactivity that could pose a threat to health 10-20 years from now, is very real and must be taken into account. Surveys to assess social, cultural, and economic impacts should be carried out routinely, as these conditions will change over time.
- Education and job creation: Culturally specific education about nuclear energy needs to take place to allay the fears of all people. Educational programs need to be repeated and evolve along with people's knowledge of the issues. Also, as power transmission companies can be a source of revenue in terms of employment, Aboriginals should be given first choice when it comes to training and job opportunities. The focus of an investment should not be the community that hosts a disposal facility, but all Aboriginals.
- Waste transport questions: Options for transporting the waste must be discussed in the same manner as this consultation. The pros and cons of each option should be presented as well as security en route and emergency measures to be taken in the event of an accident or a terrorist attack. It is important that preparations are made for the worst case scenario.
- Decision making: Before a site is selected, all communities surrounding the community that has agreed to host a disposal facility should be consulted. Also, all the communities' en route to the facility should be involved in the selection process. Métis people should be appointed to decision making boards so that they are truly involved in the process as implementation proceeds. Ownership of a decision is important and cannot be accomplished just by asking for an opinion.

3. What special Aboriginal insights and/or concerns should be kept in mind by NWMO as implementation proceeds?

We need to define “community.”. For Aboriginals the community is different; Aboriginal citizens are citizens plus – we have the rights of the average citizen, and then as aboriginals we have special rights and treaty rights. The question of “what is a community” needs to be answered in every instance. For example, there may be a community within a community, or within a small town there is a Métis community and a First Nations community, etc., how do we insure that the interests of the minorities are protected? In addition, cultural boundaries need to be considered. When plans are developed, (or agreements drafted) it is necessary to insure that there is capacity on both sides, i.e. the Aboriginal side and Government side, to insure that the views of the Aboriginal peoples do not go unnoticed, and are understood. This said, it must be noted that the three Aboriginal Nations of Canada are distinctly different cultures and these cultural differences must be recognized and respected.

Aboriginal Tradition Knowledge is an aspect of culture that needs to be recognized as unique. It is knowledge that is handed down from generation to generation. A way must be found to incorporate this knowledge into plans and procedures in a manner that is relevant and complimentary to the process.

Transparency is probably the most important aspect of this initiative, one that deserves mentioning over and over. Transparency does not mean just truthfully answering questions when they are asked, but involves presenting all sides to an issue as well as possible worse case scenarios and how they would be handled. There should be no surprises.

We appreciate the opportunity to share our opinions with NWMO and the Government of Canada. We anticipate that as the process proceeds, we will continue to be consulted and steps will be taken to involve Métis people in the decision making process and management planning as they proceed. We look forward to seeing NWMO’s revised final report, rewritten to include Métis opinions and concerns as presented in the final report of our consultations, and this paper.