

Comments on Draft Proposed Transparency Policy

by J.A.L. Robertson

In a submission earlier this month I commented on siting aspects of the NWMO's Draft Plan. This submission responds to Ken Nash's invitation to comment on the draft transparency policy.

I strongly support the Commitment and Rationale, as expressed in the draft, but I have reservations on the Implementation. I further strongly support the five values identified under Background. However, it is how these will be applied that I question. One may endorse motherhood without endorsing the offspring.

A criticism of NWMO's activities during its first phase related to communications. It preached Dialogue but failed to practice it. A statement followed by a response does not constitute a dialogue but two monologues. The NWMO published on its website many background papers. These resulted in many submissions, also published, but as far as I know there was never any follow-up. I never received any response to my submissions; there was never any debate published as the result of challenges of the papers in the submissions; and, with very minor exceptions, the submissions and their criticisms were not mentioned in the Final Report. The overall impression was that the solicitation for input was cosmetic.

By publishing on its website background papers and submissions that contain contradictory information the NWMO is lending its authority to erroneous or misleading information by at least one of them. This is not exhibiting responsibility to the public. Indeed, the criticism in this submission would result in the NWMO being in breach of all five of its values.

From personal contacts I believe that the NWMO is sincere in seeking input and so I offer three suggestions to improve the situation this time:

1. An obvious one is that the NWMO should respond to submissions, say within two weeks, indicating its reaction and how it intended resolving any disputes. This would enable the submitter to pursue the issue, i.e., it would initiate a dialogue.
2. If a submission comments on a Background Paper or another submission the NWMO should inform the original author, encouraging a response to initiate a dialogue.
3. At the time of publishing its draft Final Report the NWMO should publish a disposition document. This would categorize according to contents of the Final Report and summarize comments received; and provide the NWMO's response to each. This suggestion is not original: the Atomic Energy Control Board, the Canadian Nuclear Safety Commission's precursor, published such documents.

Should the NWMO wish, I would be pleased to explain or discuss this submission, i.e., to enter into a dialogue.

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