



NUCLEAR WASTE MANAGEMENT ORGANIZATION SOCIÉTÉ DE GESTION DES DÉCHETS NUCLÉAIRES

# Transparency Policy

JULY 2020



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## Policy Statement

We will be open and transparent in our process, communications and decision-making, so that the approach is clear to all Canadians. We will work to ensure our practices are aligned with the spirit of the NWMO Reconciliation Policy and all relevant freedom of information, access to information and privacy legislation.

## Rationale

Transparency is one of the NWMO's corporate values, underscoring our commitment to communicate openly and responsibly, providing information about our approach, processes and decision making.

Sharing information and encouraging an exchange of perspectives are fundamental to our mandate to implement Canada's plan for the long-term management of Canada's used nuclear fuel. In fulfilling our mandate, we have undertaken to carry out our work collaboratively with Canadians by:

- » seeking the participation of interested individuals and organizations and being responsive to a diversity of views and perspectives;
- » communicating actively, promoting thoughtful reflection and facilitating a constructive dialogue; and
- » pursuing the best knowledge, understanding and innovative thinking in our analysis, engagement processes and decision-making.

Transparency is a key component of our ability to carry out this work effectively. The NWMO is committed to open and transparent communication with the public and to fostering our partnership with communities. We endeavour to make material about our activities available, including information we create, receive or analyze in support of our work. We will also describe how we used this information when we document our decision-making.

## Requirements/decision criteria and sharing information

We will continue to engage Canadians in all aspects of our work through formal public engagement activities, round tables, public meetings and other forms of dialogue.

We also provide access to information through our website, social media and to members of the public upon request. Requests can be sent by email to [contactus@nwmoc.ca](mailto:contactus@nwmoc.ca) or through direct message on our social media accounts @NWMOCanada.

We endeavour to publish or provide information on a timely basis. Where consent is required for publication, we will not publish information without that consent.

We consider a variety of factors in determining what information we publish or provide. The following considerations reflect (i) the corresponding sections contained in federal and provincial freedom of information legislation applicable to public sector entities; and (ii) the NWMO's commitment to its Indigenous Knowledge Policy and its Reconciliation Policy. The factors include:




- a. whether the information could reveal positions, plans, procedures, projects, criteria or instructions that have not yet been put into operation or made public;
- b. whether disclosing the information could reasonably be expected to reveal information that is confidential to the NWMO or any other person;
- c. whether disclosing the information could reasonably be expected to:
  - » seriously threaten someone's life, health or safety or create an environmental, health or safety hazard to the public;
  - » harm the environment or an endangered species protected by law;
  - » affect security of particular buildings, other structures, vehicles, computer networks or systems, other communications networks or systems, or their protection systems;
  - » interfere with law enforcement matters including investigations or legal proceedings involving NWMO;
  - » affect relations with governments, including foreign, municipal, regional and Indigenous governments;
  - » affect the defence or national security of Canada;
  - » reveal consultations or deliberations involving management and/or Members and/or the Board of Directors (or any committees of the Board);
  - » reveal advice or recommendations of an NWMO employee or a consultant retained by the NWMO;
  - » seriously affect the economic or financial interests of the NWMO or any other person, or result in undue financial loss or gain to the NWMO or any other person;
  - » significantly interfere with any contractual or other negotiations;
  - » result in similar information no longer being supplied to the NWMO;
  - » deprive an NWMO employee or another individual of priority of publication

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- d. whether the information:
- » is personal information;
  - » is subject to copyright or other intellectual property rights, including the rights of knowledge-holders of Indigenous Knowledge;
  - » is interim work product (such as drafts);
  - » has been published, is available to the public from another source, or will be published within a reasonable period of time of the request;
  - » can be reasonably expected to reveal a trade secret or industrial, scientific, technical, commercial, financial or labour relations information with monetary value or potential monetary value belonging to the NWMO or any other person;
  - » relates to employment-related matters in which NWMO has an interest;
  - » relates to testing or auditing procedures or techniques;
  - » is subject to privilege, including solicitor-client privilege, litigation privilege and settlement privilege, or the professional secrecy of advocates and notaries;
- e. whether disclosure of the information is prohibited or restricted by law;
- f. whether the disclosure of the information is consistent with NWMO's Indigenous Knowledge Policy or Reconciliation Policy, or would negatively impact NWMO's relationship with Indigenous people;
- g. the age of the information;
- h. any compelling public interest in disclosure of the information:
- i. whether we are of the opinion, on reasonable grounds, that a request for information is in bad faith, frivolous, vexatious, for a purpose other than to obtain access to information, or is otherwise a misuse or abuse of our Transparency Policy; and
- j. the cost or time required to search for and prepare the information for disclosure.

NWMO may require a person requesting information to pay fees for the searching, preparing, copying and shipping of the information. In deciding on fees to be charged, Stakeholder Relations will reference the Fees, Fee Estimates and Fee Waivers guidelines published by the Information and Privacy Commissioner of Ontario to determine practices for claiming and calculating fees associated with freedom of information requests. A detailed statement of the fee calculation will be provided to the requestor. If the fee amount is expected to exceed \$25, the requestor will be provided with a fee estimate. If the fee is expected to exceed \$100, NWMO may require a fee deposit equal to 50% of the estimate.

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**For more information,  
please contact:**

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