

1. (p.4) It is indicated that this document begins a process of dialogue with Canadians re the long term management of used nuclear fuel. My response to this, is why has this consultation started so late, when 1.7 million used fuel bundles have already been created?
2. (p.4) You say that there are disagreements on how to achieve shared goals of peace, freedom, human well-being...and you list a broad range of important questions (e.g. how heavily should we rely on emerging technologies?). You say that these questions are “fundamental to meeting the challenge of managing used nuclear fuel in an appropriate and acceptable manner”. Then, on p.20 you basically rule these questions out of order, and say that your focus is only on the storage of nuclear waste. You say again and again that you want full consultation, but you define the issues that can and can’t be discussed in advance. I do not see how you can have a full discussion about dealing safely with radioactive waste without also having a discussion of whether it is necessary, ethical and socially acceptable to be producing such waste in the first place.
3. (p.6) You say that “Canada is now on a path to carefully consider a long-term management approach”. I find this horrendous and unacceptable that we have allowed 1.7 million fuel bundles and counting to be produced without such a plan. It is something one might expect in a dictatorship; in a democracy it is a embarrassment.
4. (p. 9). Yes, the immediate problem is how to deal with the waste we have produced. But the real problem is how to meet our electricity needs in a way that does not potentially compromise the future health and viability of our planet. You indicate on p. 44 that “scientific and technical experts cannot predict with complete certainty how any management approach will perform over the many thousands of years required to contain and manage potential releases...”. There is your answer: there is NO completely safe way to deal with the production of radioactive waste that will last thousands of years, therefore the ONLY viable solution is to stop producing such waste (and you have ruled the option off the discussion table). I find this totally unacceptable.
5. (p. 45) You talk about the merits of a precautionary approach, which holds that “prevention is better than cure” and that “irreversible effects should be avoided”, and “the interests of future generations”, and you say there is a need for “full participation” of the affected public, yet you rule out of consideration the obvious precautionary approach of ceasing to produce radioactive waste that you yourselves admit we cannot be sure will not harm future generations. Also, your discussions cannot pretend to involve “the affected public” because you are only including people who are alive today, not the hundreds of future generations that are being affected too.
6. (p.47) You speak of the ethical importance of “disclosing uncertainty, clearly and humbly” yet on p. 31 you make the sweeping and arrogant claim that “in Canada,

used nuclear fuel is safely stored”, even though you admit elsewhere this is only a temporary storage means, and you speak again and again that nothing is certain on this issue.

7. (p. 52) No this is not full public engagement because you are not allowing the public to speak on the full range of relevant issues to the topic, as discussed above.
8. (p.53) Q4. No this is not a fair and equitable process, because you are overweighting the voices of today’s generation, and not hearing the voices of future generations, and not hearing the voices of non-human beings.
9. (p.54) Q6. No, the management approach will not ensure people’s health and safety, because, as you indicate on p.44, there is not such thing as certainty when the time frame of destructive capability of waste in tens of thousands of years.
10. I am very saddened that you appear to be aiming to legitimize continued nuclear energy use rather than seizing this opportunity to have an open and frank public discussion of the issue.