

Citizens' Network on Waste Management
17 Major Street, Kitchener, Ontario N2H 4R1
519-744-7503

August 31, 2005

Ms Elizabeth Dowdeswell, President
Nuclear Waste Management Corporation
49 Jackes Avenue First Floor
Toronto M4T 1E2

RE: Choosing a Way Forward

Dear Ms Dowdeswell,

The Citizens' Network on Waste Management is a network of citizens' groups throughout Ontario working on radioactive waste, hazardous waste, and municipal waste issues. The organization has been in operation for 25 years.

We support your primary objectives: safety and fairness to this and future generations. However, we have serious concerns with the strategy outlined in "Choosing a Way Forward" because we do not believe that it will achieve those objectives.

Fairness to future generations requires that we take the first critical step of phasing out the generation of radioactive wastes. No matter what types of facilities are created to try to address the wastes, they will create serious risks for future generations. The only reasonable way to protect future generations is to stopping producing ever more wastes. NWMO should not ignore this critical requirement.

The Adaptive Phased Management approach that NWMO is proposing is portrayed as positive because it "would preserve flexibility during implementation in the coming years." Again this creates a fairness problem – especially when combined with the "willing host" approach that you are proposing for facility siting. A community cannot make rational decisions about the acceptability of a facility in their community when they cannot get clear answers to questions such as: how long will the facility be in active operation? how much waste will the facility receive? precisely what will the facility be like?

Chapter 13 "Description of Activities and Timetables" of your report highlights another fairness flaw in the process. Throughout this chapter, references are made to stakeholder consultation during the siting processes. All of this is focused on what would be a suitable site. What the people at proposed sites should be given the opportunity to discuss is whether the proposed facility is suitable - not whether the site is suitable.

NWMO should stop the process that it is currently involved in and take the first critical step of saying to the governments that, regardless of technology, the risks associated with long-term storage or disposal of high level radioactive wastes are substantial. On this basis, the NWMO should recommend to the government that they take the pollution prevention approach of phasing out the generation of radioactive wastes by power plants. Only when a plan for such a phase-out is committed to, should the NWMO consider what to do with the wastes that have already been created. Only then can NWMO fully understand the extent and nature of the problem that it will have to address.

Yours sincerely,

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