

What We Heard: Report on Engagement Activities

Issue No. 2, September 2008

Setting the Framework for Action: NWMO's Draft Implementation Plan

I. INTRODUCTION

The Nuclear Waste Management Organization (NWMO) was established in 2002 by Ontario Power Generation Inc., Hydro-Québec and New Brunswick Power Corporation in accordance with the Nuclear Fuel Waste Act (NFWA) to assume responsibility for the long-term management of Canada's used nuclear fuel. Used nuclear fuel is presently safely stored on an interim basis at licensed facilities at nuclear reactor sites in Ontario, Québec and New Brunswick, where it is generated, and at AECL's nuclear research facility in Manitoba.

NWMO's first mandate was to study options for the long-term management of used nuclear fuel. In 2005, NWMO completed its study and put forward its recommendation to Government. On June 14, 2007, the Government of Canada selected the NWMO's recommendation for Adaptive Phased Management (APM). With this decision, the NWMO now has the mandate to implement the Government's decision.

Technically, Adaptive Phased Management (APM) has as its end-point the isolation and containment of used nuclear fuel in a deep repository constructed in a suitable rock formation. Collaboration, continuous learning and adaptability will underpin the implementation of APM which will unfold over many decades, subject to extensive oversight and regulatory approvals. All aspects of NWMO's work will meet or exceed all applicable regulatory standards and requirements for protecting the health, safety and security of humans and the environment. APM moves towards a goal Canadians have themselves identified: safe and secure long-term containment and isolation of the used nuclear fuel that we produce with the flexibility for future generations to act in their own best interests.

One of the NWMO's first task as implementing organization was the development of a five year strategic plan or Draft Implementation Plan. In this document we outline what we heard about our Draft Implementation Plan – its overall appropriateness, concerns, suggestions, and needed additions and clarifications. This plan is intended to be a rolling five-year plan, reviewed and updated annually. As such, it is intended to be a living document. We invite your comment on this document as it is regularly assessed, strengthened and redirected in response to the comment of Canadians and as may be appropriate in the face of new information and shifts in the internal or external operating landscape.

Dialogue and Engagement – Our Goal

The work of the NWMO is premised on the understanding that citizens have the right to know about and participate in discussions and decisions that affect their quality of life, including the long-term management of used nuclear fuel. Citizens bring special insight and expertise which result in better decisions. Decisions about safety and risk are properly societal decisions and for this reason the priorities and concerns of a broad diversity of citizens, particularly those most affected, need to be taken into account throughout the process. A critical component of APM is the inclusive and collaborative process of dialogue and decision-making through the phases of implementation. We are in the early stage of our efforts and will report regularly on our activities.

II. RECENT ACTIVITIES - Setting the Framework for Action: NWMO's Draft Implementation Plan

The purpose of this document is to summarize and report out on the comment received on the NWMO's "Implementing Adaptive Phased Management 2008 to 2012 – Draft Plan" (Draft Implementation Plan). The Draft Implementation Plan sets out how NWMO intends to move forward over the next five years (2008-2012). The document was released for review and comment by Canadians with the intent of identifying adjustments and/or course corrections needed in order to better respond to the needs of Canadians at a very early stage in the planning of the organization. NWMO understands that the Implementation Plan needs to derive its strength and acceptance from a shared vision of where the NWMO is headed. NWMO intends to invite input on its five-year plan each year in order to help shape and direct the approach to implementation activities.

The Draft Implementation Plan was published on April 14, 2008 for public comment on or before the end of June. The NWMO sought the input of interested Canadians through:

- Posting of the Draft Implementation Plan on the NWMO web site: All visitors to the website were encouraged to make a submission or comment on the plan through a special tool on the website, or to complete a web-survey;
- Mailing of the Draft Plan to interested individuals: This included those who put their name on the subscribers list on the NWMO website as well as a list of individuals and organizations that NWMO had identified may have an interest. In all, more than 1700 copies of the draft plan were mailed out for review; in addition more than 1,200 e-mail invitations were sent seeking comment;
- Review during the third meeting of the NWMO Citizen Panels: Eight groups of randomly selected citizens who agreed to meet over the course of a year to consider and discuss issues related to the work of the NWMO had as the focus of their third meeting review of the Draft Implementation Plan. These panels were organized and conducted by the Navigator consulting firm;
- Convening an E-dialogue: Conducted by Royal Roads University which conducted an open e-forum soliciting comments; and
- Ongoing individual briefings and group presentations with:
 - Nuclear site communities including local, provincial and federally-elected representatives, Community liaison groups, advisory committees and the Canadian Association of Nuclear Host Communities (CANHC);
 - Municipal associations at the national and provincial levels;
 - Federal and provincial government representatives, with a focus on staff;
 - National and provincial Aboriginal Organizations, NWMO Elders' Forum and the Niigani working group;
 - Non-governmental organizations;
 - Nuclear industry representatives and organizations in Canada and abroad;
 - Conferences/ Networks/ Roundtables sponsored by others.

Three questions were included with the mail out and posted on the web site to guide review of the document:

- Have we identified the right strategic objectives, have we missed key areas?
- Have we identified appropriate activities?
- What else would you like to know about the implementation plan?

The submissions received by the NWMO, for which authors gave their permission, have been published on the NWMO website. The individual consultant reports of these activities, including the Citizens Panels' review of this document (Phase 3 as summarized by Navigator), as well as the report of findings from an e-dialogue conducted on the same topic (prepared by Royal Roads University) are also published on the NWMO website.

Note that the NWMO received only a modest level of interest in our Draft Implementation Plan. Of the approximately 1700 copies mailed to individuals and organizations who had previously expressed interest, only about 50 submissions/comments were received. Of the approximately 1,200 individuals and/or organizations notified by email, a smaller number returned comments. Interest in the e-dialogue was very low with only 7 comments received. The survey on the web site interested 51 people to participate with a smaller number providing detailed comment.

General awareness of the NWMO and its activities continues to be low, and this subject matter did not appear to invite new substantial interest although a diverse set of comments were received.

NWMO continues to seek ways in which it can build awareness, understanding and involvement in its plans and activities. A more widespread engagement and awareness building program is planned for 2009 when the NWMO expects to present an initial draft plan for the site selection process for public review. The release of the siting plan is expected to bring new interest to the work of the NWMO which the NWMO will attempt to build upon for review of the Implementation Plan in 2009 and years following.

Implementing Adaptive Phased Management: 2008 – 2012

In June 2007, the Nuclear Waste Management Organization (NWMO) was given responsibility for implementing Adaptive Phased Management (APM), Canada's long-term plan for used nuclear fuel. This draft Implementation Plan sets out our ideas about how to move forward over the next five years. The Plan has been developed with guidance received in our most recent phase of public engagement, initiated in Summer 2007.

This document begins with an overview of the NWMO, Adaptive Phased Management, and how we arrived at this point. The Plan is built upon our priorities and strategic planning objectives. With this Plan, the NWMO reconfirms and demonstrates its commitment to engaging and collaborating with interested Canadians in defining how we go forward. The NWMO invites all interested individuals and organization to get involved.

To guide our work the NWMO Board of Directors has embraced seven strategic planning objectives. These objectives flow from the NWMO's Vision, Mission and Values, and the objectives and expectations that Canadians said were important for APM. The Strategic Objectives provide the framework for developing work programs to assess and address the implications of the many issues related to the implementation of APM.

The Strategic Objectives are the foundation for our first five-year Implementation Plan. The initiatives described are intended to guide our work in a coordinated and systematic way over the period 2008 to 2012. The seven Strategic Objectives are:

- Seek to build long-term relationships with interested Canadians and Aboriginal people.
- Advance technical and social research.
- Develop and refine a funding formula and trust fund deposit schedules that address financial surety and long-term program funding.
- Continually review, adjust and validate plans.
- Continue to develop and maintain a governance structure.
- Build NWMO as an implementing organization.
- Proceed with the collaborative design of a process for site selection.

III. WHAT WE HEARD

i) Overview

Overall, comments received were generally supportive of the Plan. The draft plan tended to be received as a high quality document outlining a well thought out plan. There was support for the objectives and the activities set out in the plan for implementing Adaptive Phased Management over the next five years. There was also support for its design as a 'living' document which will continually be adjusted over time with knowledge and experience. The commitment to openness and transparency demonstrated in the plan was consistently applauded.

Among NWMO's citizen panelists in particular, the Draft Plan, more so than other documents which the panelists had reviewed earlier (the NWMO brochure and the Executive Summary from the Final Study report), communicates that NWMO has a concrete and well thought through plan, which contributes to their confidence. The more detail which is provided concerning how the NWMO will actually conduct the work it has planned the greater was panelists' confidence. The Draft Plan is also seen to include good discussion on important touchstones for panelists, including: technical research, use of international collaboration and benchmarking, transportation issues, siting, and involvement of youth.

Questions raised about the plan, and suggested adjustments, tended to centre on the following:

Sense of urgency: Some concern was expressed that the time frame for the work of the NWMO is longer than it needs to be. Some are concerned the NWMO may not be able to keep pace with the growth of nuclear power in Canada. Some would like to see greater urgency with respect to NWMO proceeding with the launch of the siting process, specifically. Among citizen panelists, the question of why APM 'takes so long' to implement has come up a number of times. For those who hold this concern, some of the detailed activities listed in the plan appeared to be too far removed from making progress in implementing APM and raised questions concerning whether NWMO is doing more than is needed, and if so why.

Allowing sufficient time: Some concern was expressed that NWMO was overly ambitious and that it may well take longer to achieve the milestones identified, particularly with respect to siting, than laid out in the plan.

Building awareness: Some concern was expressed that NWMO needs to be more aggressive in building awareness and knowledge among citizens and more attention should be given to this in the plan. Some concern was also expressed that NWMO maintain a broad scope to its engagement, reaching out to citizens across the country – both those interested as well as those uninterested and/or unaware – since some see the management of nuclear waste as an issue of concern to all citizens. Some suggested the NWMO has not allowed for sufficient time to build the required level of awareness.

There was some suggestion that the NWMO needs to rely less on its website for outreach and instead rely more on more proactive approaches. There was some suggestion that the NWMO Transparency

Policy also include details on proactive efforts which the NWMO will make to build awareness of its plans.

Demonstrating accountability: Questions were raised about how NWMO will monitor and assess its progress in completing the plan over time. Interest was expressed in how NWMO's progress against its commitments will be measured and how will this progress be independently verified.

Interest in more detailed plans: There is interest in learning more details concerning the various initiatives proposed in NWMO's work program with respect to Objectives 4, 5 and 7 - particularly among nuclear host communities.

The value of independent review: Some suggestions were made that independent review and oversight be given a strong role in the NWMO process. Some suggestions were made concerning the type of selection processes which might be used to select members to independent bodies.

Confusion over focus on nuclear provinces: Some do not understand why the NWMO would limit its focus to the existing nuclear provinces when there are plans exploring building nuclear reactors in Alberta, and other provinces may join the 'nuclear group' in the future.

Confusion concerning repeated reference to Aboriginal peoples: Some questions were raised about why Aboriginal peoples, as a specific group, receive the attention they do in the plan. There was speculation expressed, incorrectly, that the reason Aboriginal peoples are receiving this level of attention is because the NWMO has a site in mind which is on Aboriginal territory.

ii) Specific Individual Comments

The range of individual comment received is reflected in the discussion which follows.

a. Comment from Aboriginal Organizations

The Assembly of First Nations, underlined the importance of the following four points:

- Develop scenarios that focus on the long-term social, cultural and economic impact of hosting a facility and seek feedback on strategies for avoiding negative impacts;
- Develop a strategy for Aboriginal involvement in decision making and implementation;
- Establish a system and protocols for the best use of Aboriginal Traditional Knowledge in site selection and long-term monitoring and surveillance;
- Develop a strategy for insuring long-term community acceptance associated with hosting the long-term management facility or living in close proximity to the facility.

Other comments from the Assembly of First Nations include:

- Integration of ATK into environmental assessment activity of lands that may or may not be claimed or used by First Nations is a priority;

- Website communications is only as good as those that can use it. ...However, if a satellite link cannot be established, much of the information that would appear on the NWMO website can be put on CD-ROM for later download. This could be updated and distributed annually;
- It would be of interest to include on the NWMO website a list of frequently Asked Questions (FAQs) and update these as new questions are asked;
- Photos of focus groups and potential facility sites (when available) should be included on the website;
- Reports of progress made by other countries in locating and implementing nuclear waste disposal facilities would be of interest.

b. Comment from Communities in which nuclear plants are located

Overall, NWMO's draft documents were seen to represent reasonable steps in implementing APM over the next 5 years. Other individual comments addressed the following topics:

The need to build awareness and the time this will take:

- There was some suggestion that the NWMO has seriously under-estimated the amount of time and the extent of work required to make the Canadian public aware and sufficiently knowledgeable about their work. The NWMO's efforts to date are seen to have been generally focused on "interested Canadians" – people who are already aware or have made an effort to become involved in the nuclear waste management issue. It was suggested that the vast majority of Canadians are unaware of NWMO's work. Experience in siting waste facilities in Canada has consistently shown that, despite the best efforts of the proponent to create broad awareness of their plans, most people will not become involved in the siting process until it has the potential to directly affect them. It is at this point that public awareness (and opposition) is expected to increase exponentially. It was suggested this has the potential to derail the NWMO's process as these newly-involved residents and organizations will not feel bound by any previously developed siting process.
- The achievement of Objective 7 (concerning the siting of a waste management facility) within the next five years seems overly optimistic and perhaps unrealistic in this light. It was suggested that creating broader public awareness, knowledge and acceptance of the NWMO's work will require a monumental effort, especially given the complexity of the issues related to the management of used nuclear fuel.
- There was some comment that NWMO should focus on increasing awareness and knowledge of nuclear waste management prior to embarking on a siting process. In this regard, the communications strategy should address such activities as: national media coverage; the provision of appropriate internet resources in areas that are currently under-served; targeted communications in areas previously identified as being suitable for the repository; how technical and financial resources will be made available to interested Canadians; and, the criteria for determining how resources will be distributed.

Concern about sense of urgency:

- There was some suggestion that the five-year timeframe proposed, just to design a siting process, appears to be excessively long. If this timeframe were reduced, the search for a willing host community could commence sooner, and the removal of used nuclear fuel waste from large and growing urban centres could be expedited. It was suggested that Canada's nuclear fuel waste owners should also support shorter timelines for implementing APM, as they could potentially avoid the costs of constructing additional dry storage facilities, in the event that new nuclear reactors are built and refurbished.

The need for more detailed plans and continued involvement:

- Comment was made that, overall, the initiatives proposed in the Draft Implementation Plan appear to be logical steps in the process of implementing APM. The details on how these initiatives are to be achieved however, are either not included in the draft, or are proposed to be detailed through specific work programs within the next 5 years. As such, it is important that NWMO ensure communities continue to be consulted as the work programs are developed.
- Comment was made that the Draft Implementation Plan is quite conceptual at this point and many of the details will not be available until many of the activities identified in the Draft Plan have actually been carried out. The NWMO should release a more detailed Implementation Plan later in 2008, review the effectiveness of the plan annually and revise the Plan to respond to evolving needs and circumstances.

Thoughts on additional objectives:

- The suggestions was made that there should be an addition of an eighth objective to the Draft Plan focussed on increasing the level of understanding about the current successful interim management of used fuel which has been managed successfully for over 40 years.

The importance of accountability:

- The comment was made that the NWMO is guided by five fundamental values. One of which is Accountability. Although there is no mention to whom the organization is accountable or how this will be monitored and measured. NWMO is in the process of establishing governance and is subject to the Nuclear Safety Control Act and the Nuclear Fuel Waste Act. The Implementation Plan should consider more specific references to these Acts and how they help to provide guidance, governance and accountability in achieving the five fundamental values.
- It was noted that the Draft Plan details seven strategic planning objectives and actions to be completed during 2008-2012. However, monitoring the achievement of these objectives is not specifically identified nor is successful achievement defined – although an ongoing public consultation and feedback process is well defined. The NWMO should establish an annual report card identifying the level of success in each of the seven strategic objectives.

The value of independent advice and process:

- It was noted that an Advisory Council has been appointed by the NWMO, which has obligations identified within the Nuclear Fuel Waste Act. It was also noted that a Technical Review Group will be appointed by the NWMO to advise both the Board and the Advisory Council on scientific and technical approaches and methodology. Identifying a qualified third party to appoint qualified people to the Technical Review Group will improve the public's confidence in the Board's commitment to accountability, transparency and collaboration in its processes, communications and decision-making.

The importance of defining "informed willing host community":

- Interest was expressed in bringing clarity to the concept of "informed willing host": We are looking forward to a detailed definition of "informed willing host community". We feel this is crucial to the whole process. What boundaries are implied in "community"? For example, geographical, political, etc.

Suggested additions:

- Comment was made that it would be beneficial to include a work timeline/gantt chart to illustrate the various timelines and tasks associated with each initiative contained in the Implementation Plan.
- It was suggested that an organization chart of NWMO staff, together with areas of expertise, would be useful to gain an appreciation of how NWMO will be equipped to address the range of issues and subjects involved in APM implementation.

Other comments:

- It was noted that a number of the key initiatives listed in the Draft Plan have already commenced, and at least one initiative (funding formula) is near completion. It is therefore unclear, why NWMO is consulting on the initiatives contained in the Draft Implementation Plan, when many have already commenced.

c. Comment from NGOs, Individuals and other Organizations

Similar to earlier engagement, some comments were received about the future of nuclear power and a preference stated to end the use of this technology before implementing a long term management approach for used nuclear fuel.

Most of the comments received confirmed that NWMO has identified the right objectives, consistent with its earlier broad consultations and dialogues conducted. Other comments addressed the following topics:

Allow sufficient time:

- Concern was expressed that the objective "proceed with the collaborative design of a process for site selection" will not be able to be completed within the five year timeframe of the plan. There is

some expectation that this objective will take longer to achieve, 5-6 years in light of the NWMO's efforts for engagement, etc.

Build awareness among all Canadians:

- It was suggested that it is as important to build long-term relationships with disinterested Canadians as it is to build them with interested Canadians and Aboriginal peoples. The NWMO needs to include the identification and empowerment of those Canadians who may not yet be interested. The NWMO needs to target and reach out to a wider range of Canadians at the earliest stages to catch their attention and get them interested because nuclear waste management is a concern for all Canadians. Under the principal objective of the NWMO engagement program, the NWMO needs to proactively reach out to build those "trusting relationships with communities" NGO's and others not yet identified as interested parties.
- Concern was expressed that too much focus will be placed on the four nuclear provinces or communities and not enough on Canadians from the non nuclear provinces. It was suggested that the goal of the engagement program should be to build awareness, understanding and support among all Canadians, not just those in the four nuclear provinces. Although the four nuclear provinces is considered a good place to start, it was suggested that the NWMO also target all the Provincial and Canadian Environmental Networks as part of its efforts.
- It was suggested that the generic information package should contain, in language intelligible to the public, an illustrative description of a repository, essential and desirable geological criteria, an explanation of why it is believed to be safe, an unbiased list of the advantages and disadvantages to the host community including illustrations of mitigation and compensation, and how safe operation would be ensured. This should be available before any approach is made to specific communities and, ideally, before the siting process is announced publicly. While such a generic proposal would not be perfectly suited to any community, it would be better than the alternative - a vacuum.
- It was suggested that the public needs to be more informed and more general public need to become involved. The NWMO needs to take more action to make this happen. This includes greater action to inform the young generation, starting with learning about this issue at school – there is an urgent need for such action.

Stay the course in a number of areas:

- It was suggested that NWMO's use of the dialogue method, instead of the debating method when setting up multi party dialogues, is particularly appropriate.
- The Polluter Pay principle was named as particularly appropriate.
- NWMO's work to review, adjust and validate plans, it was suggested, is very important because we live in a changing world. This would include the role of nuclear energy.
- NWMO's efforts in the area of reporting on "developments in technology, societal expectations energy and environmental policy on an ongoing basis through many communication routes" was also applauded amongst the comments made.

- NWMO's plan for an annual report documenting alternative technologies for long term management of used fuel including reprocessing, partitioning and transmutation was also commended in the comments received.
- NWMO's efforts to ensure future generations will have the support and knowledge to continue to manage the nuclear waste produced was also commended.

NWMO governance, accountability and the value of independent review:

- Questions were received about the Board of Directors, Advisory Council, particularly who the members are, what are their qualifications and what was the selection process. Specifically, how are ENGOs, social justice and environmental public interest groups represented? It was suggested that NWMO governance needs to be strengthened and action items for Governance Structure need to be added.
- Comment was received that independent review, such as is referenced with the formation of a Standing Independent Technical Review Group, is a good step.
- It was suggested that external parties representing areas such as social science, community capacity, and development areas need to be included in NWMO governance.
- Questions were raised about who will be responsible for ensuring that NWMO meets or exceeds all regulatory requirements.
- Questions were raised concerning to whom NWMO is accountable. Is NWMO accountable to government, nuclear waste producers, Canadians at large or all of these?
- It was suggested that the NWMO's narrow position regarding involvement in energy policy (that it neither supports nor opposes the future expansion of nuclear power) is disingenuous. It was suggested this position can easily be seen as a way for the nuclear industry to advance their agenda without accountability.

Site selection:

- It was suggested that the question of what constitutes the affected community is a difficult one that deserves serious discussion before approaching the public.
- It was recommended that the NWMO incorporate the voluntarism principle whereby communities, having been provided with the information package and any desired follow-up, state the conditions under which they would be prepared to accept a repository. It was suggested that the NWMO would still be responsible for selection of the site but only after establishing what communities would require for them to accept a repository in a free market. The selection should be based not only on technical optimization but also on community acceptance.
- Questions were received about the identity of potential host sites. Are there a number of potential sites in Canada that meet the technical criteria required? What are the community/political objections to each site? Are there problems of transporting existing and future used nuclear fuel to the site chosen and are they serious enough to affect the choice of site? Given that the site will need to be monitored for a long period of time, should it be designed as a disposal site only or as a storage site from which used nuclear fuel could be retrieved for reprocessing should this prove itself

to be an attractive option in the future, and does this issue affect site selection? How is all this to be paid for now and into the future?

- It was suggested that the technical problems associated with selecting a site are not insurmountable. Instead, the substantial problem is considered to be how to secure public acceptance of the site choice. Concern was expressed that neither the NWMO, nor anyone else, can design a collaborative process for site selection that will materially assist in solving this problem.
- The suggestion was made that NWMO be more aggressive in site selection. It was suggested that 6 or 8 site locations be identified, rough plans be devised for each site and the NWMO start building long term relationships with interested Canadians including Aboriginal people in these locations. NWMO should consider a strategy of tentatively identifying several locations, roughing out a plan for each and beginning to gather in statements of support and statements of concern from stakeholders in the several locations. If too much concern emerges, all could be invited to become actors in the collaborative design process as it emerges.
- Concern was expressed that open discussion on the siting process needs to begin now. The NWMO needs to urgently prepare an information package before mention of any specific location. Any potential host community should have available to it a fair account of what is proposed before opposition arises.
- Concern was expressed that the NWMO needs to be clearer that it will only select a site with the support of the community.

Build trust and confidence:

- It was suggested that the NWMO can't emphasize too much the importance of building trust and confidence in the NWMO and its operations. It is essential that NWMO build long-term relationships with communities, Aboriginal people, NGOs, citizen etc. Without this, it was suggested, the rest will fail.
- Questions were raised concerning how the NWMO will develop and maintain trust. How will the NWMO develop its relationship with communities that have demonstrated that they do NOT trust the NWMO or other nuclear industry representatives? The NWMO has failed to mention how it will deal with the strong positive AND negative views that will inevitably be expressed and how it will design a process that is considered trusted and fair by all involved.

Importance of process:

- Comment was made that NWMO needs to make specific commitments with respect to the transparency of its process and decision-making. NWMO needs to make a clear statement addressing what steps the NWMO will take to make their processes and decision-making open and transparent and how/to what extent, interested stakeholders can participate and influence these proceedings. For instance, one issue that the NWMO should address is the necessity of providing a long enough comment period to allow for stakeholder feedback, as well as more open calls for participation in NWMO's various dialogue processes.
- Comment was also received that although the policy states that the NWMO will describe how it has gathered and used information, to date the NWMO has not always been clear regarding how it has

used stakeholder perspectives. For instance, the NWMO has not clearly articulated how it incorporates or deals with views that differ from the predominant perspectives, such as those of Canada's Aboriginal peoples and environmental groups who clearly stated during the study that geologic disposal was NOT their preferred option.

- Comment was received that the NWMO needs to be much clearer regarding the range of ways that information will be communicated and should take into consideration such factors as language barriers, lack of technology access or knowledge, types of information preferred by different communities, commitment to 'plain language' documents, etc.
- It was also suggested that criteria are required to evaluate the APM objectives, as is a clear policy regarding how conflicts amongst the APM objectives will be resolved.
- It was suggested that it will be important for the NWMO to obtain the respect of the international environmentalist movement.

New Inclusions, Gaps and Concerns:

- It was suggested that a more specific reference to universities in New Brunswick should be made in outlining the research program, as well as those in other nuclear Provinces. How are these universities and the consulting community which the NWMO works with selected? Will there be open competitions?
- Concern was expressed about the approach to ethics outlined in the document, both the application of the ethical framework developed for the study phase to guide implementation and report regularly on activities against this framework, and the use of the guidance of advisors including ethicists. It was suggested that the NWMO needs to identify precisely which ethical values they will operate with and standards of the ethicists used. What are the philosophical assumptions and value base of these ethicist advisors? It was suggested that this all needs to be determined by *public input*, before the NWMO starts engaging these advisors.
- Concern was expressed that the closing down of nuclear power is not included in the list of objectives but should be. In the words of one commenter, "One problem with the objectives is that we asked you to manage the waste already produced and to stop as soon as possible producing nuclear energy except for medical purpose. But you still haven't said anything about that. When will you cease producing nuclear energy? Even prominent physicists are opposed. You are playing with our planet's survival."
- Among the gaps in the Draft Implementation Plan, it was suggested that activities be included related to uncertainty analysis with respect to whether financial obligations can be met.
- Comment was made on the need to provide reports to provincial government in the four nuclear provinces.
- It was suggested that presentations before and comment by Legislatures form part of the formal means to confirm the social acceptability of the NWMO's plan. Formal venues, such as Standing Committees of the House of Commons and Provincial Legislative Committees, should be considered. City Council presentations for progress reports, it was suggested, are also essential.
- More information about how used fuel would be transported is needed.

- More specific details concerning how ATK (Aboriginal Traditional Knowledge) will be incorporated into technical research is needed.
- It was noted as a deficiency that the section about social research is far less complete and detailed than that for technical research. It is difficult to imagine how the success in meeting these objectives could be measured or evaluated. Although the work plan states that there will be an annual review, no details are provided. When will the review occur, who will undertake the review, how will it be evaluated, etc? And why is there a technical review committee but not a social science review committee? Leaving the social research so abstract and vague, without clearly stated objectives and measurement criteria means that stakeholders cannot ascertain exactly what the NWMO plans to do nor can they evaluate the outcomes of that work program.
- It was suggested that the multiple use of the term 'objectives' in the Draft Plan was confusing – there are APM objectives, strategic objectives and objectives for each strategy. This is further complicated by other frameworks that the NWMO has also outlined such as the ethical framework. Clarity regarding these various sets of criteria and their interaction and overall importance to the NWMO's decision-making process is required.
- The NWMO's offer for public involvement in the design and implementation of a siting process should be clearer. The fundamental tenets of a siting approach are already established. Certainly there remain crucial decisions to be made regarding siting. However, the NWMO continues to be reticent about the specificity of siting. Preferring instead to keep the repository "abstract and placeless" public contributions to the process are minimized or, at worse, trite. Its reticence to appear proactive, when in fact it is continually making important siting decisions, is disingenuous.
- It was suggested that NWMO extend research and organizational processes to consider a potential role for Canada as host of an international waste storage facility. Specifically, waste management and storage in consideration for uranium fuel sales, carbon credits or other international credits.
- It was suggested that NWMO has missed having a realistic assessment of the capabilities of fallible humans and our limitations in predicting events. It was suggested that in the time we need to properly store nuclear waste, there could be massive geological events such as an ice age.

d. Focus on Comments by NWMO Citizen Panels: Comments about Selected Strategic Objectives

Strategic Objective: Building Relationships

Noted as particularly appropriate:

- The NWMO is committed to involving citizens in its work.

Confusing concepts:

- Communication audit: Some don't know what this means and some concern this may be unnecessary and the cause of delay
- Corporate citizenship program: Some don't know what this means and concern this may inappropriately involve corporations
- Social responsibility: Some don't know what this means
- The focus on the nuclear provinces: Some questioned why NWMO would focus on the existing nuclear provinces when other provinces may join the nuclear group in the future.

Missing:

- Reference to inclusion of environmental groups and other groups/associations which ought to be involved
- Reference to increasing awareness among citizens
- Discussion of what NWMO has already accomplished since its inception in this area and that the organization has already made progress. What stage in the work are we at today? Tell us how it is going.
- Discussion of the specifics of the planned activities which moves beyond statement of intentions, for instance how specifically the NWMO will engage youth.

Desired Adjustments:

- Why the focus on First Nations? To what end are they being involved. The suspicion is that it is because the site will be located on Aboriginal land, which suggests that NWMO already has a site in mind
- More specifics about the nature of the 'relationship' which NWMO is seeking – information out, consultation, partnership?
- To some, progress looks too slow based on this discussion
- Restate which provinces are the four nuclear provinces.

Strategic Objective: Building Knowledge

Noted as particularly appropriate:

- The NWMO is drawing from a wide variety of sources
- The NWMO is working with experts outside of the organization
- The plan looks all encompassing
- The plan contains concrete activity which will yield rigorous data on which decisions can be based
- The plan contains concrete activity on transportation in particular
- International research projects
- The discussion of technical research builds confidence, even though panelists' understanding was limited.

Confusing concepts:

- Aboriginal Traditional Knowledge – Some don't know what this means
- Uranium dioxide dissolution rates – Flagged in each citizen panels session as activity which needs clarification
- 'Capacity building' – Some don't know what this means.
- Hydride cracking (*Note, it may be the word 'cracking' which causes concern*).

Missing:

- There is an expectation, by some, that NWMO will technically assess all regions of the country for their suitability as potential sites in advance of soliciting a willing host. Greater clarity desired by some. Some call for an inventory of sites to be conducted, both on Aboriginal land and outside Aboriginal land.
- More discussion of health and safety aspects – impact on people.
- In the discussion of international activities, US, UK appear to be noticeably absent without explanation. There is some feeling that these countries, because they are most like Canada, are the most appropriate countries for inclusion.

Desired Adjustments:

- Some found the reporting overdone, and indicative that NWMO was moving more slowly than necessary
- For some, it looks like several of the items on the social research list are already complete or well advanced (such as the citizen panels), should be acknowledged as such, and removed from the list. Contributes to sense that NWMO may be moving too slowly
- Specify how much work is planned, over what time, and at what point the work will be definitively completed. This would reduce among some the sense that planned activities continue without end.

Strategic Objective: Review, Adjust and Validate Plans

Noted as particularly appropriate:

- NWMO is proceeding “slow and sure” rather than “fast and unsure”.
- It is appropriate that work continues to be updated
- Periodic reporting out, for instance “publish on an annual basis”
- Posting research papers, making them public, general value of transparency
- Reference to ethicists
- Inventory of used fuel and forward planning which this signals.

Confusing concepts:

- “nuclear new build” – Some don’t know what this means
- “triennial” – Some don’t know what this means.

Missing:

- Discussion of whether there is any possibility in the future for the waste to be re-purposed
- Discussion of how NWMO will monitor itself in terms of doing what they said they would do.
Reporting is not the same as monitoring
- Discussion of how provinces which may become nuclear in the future will be taken into account.
Some do not understand why the NWMO would limit its focus to the existing nuclear provinces when there are plans developing for reactors in Alberta.

Desired adjustments:

- Some wondered whether the ‘checking and double checking’ was ‘overkill’ and/or whether NWMO was moving ‘too slowly and too surely’. For instance, is it necessary to publish both an annual and triennial report, and if so why?
- More detail about how the NWMO intends to actually do/complete the work which is proposed
- Need to state who will they be seeking input from, and will this include ordinary citizens as well as specialists (people at all levels) as it ought to do.
- Recognition that although flexibility is good, it also contains the risk that the program could be inappropriately cut back in the future, say by government. Any evolution of values may be in a bad or inappropriate direction. “Often bad things are done because of a change of values.”
- Need greater clarification on how a technological breakthrough would be taken into account.

Strategic Objective: Collaborative Siting Process

Noted as particularly appropriate:

- The NWMO will involve citizens
- The NWMO has concrete plans and work activities to advance siting.

Confusing concepts:

- The word “siting” sometimes read as “sitting”.

Desired Adjustments:

- Some argued that NWMO should be more aggressive in site selection by conducting a technical pre-screening of possible sites and only focus on developing relationships with communities and areas which satisfy the technical pre-screening requirements. In a letter from one individual, the following comment was made, “I think I would identify 6 or 8 possible locations and devise a rough plan for each site and start building long term relationships with interested Canadians including Aboriginal people...”
- A similar sentiment was expressed by individuals in each of the citizen panel sessions, although there was no consensus on this issue. A number of panelists in each session raised the expectation that the NWMO would be conducting some initial studies of possible sites in order to ensure that any willing host community which comes forward meets geological requirements. Citizen panelists wanted to see greater clarity on this matter in the plan.
- Some called for more discussion on who are the Canadians NWMO intends to involve, how will NWMO involve them, and who ultimately will make the decision on the site. Clarify that both experts and the public are important
- More discussion on how an education and awareness building program will be advanced.
- Clarification on how much emphasis will be placed on public opinion? What is more important: public opinion or suitability
- Include discussion of international experience – and the fact that progress has been made elsewhere. Would like to see included in this: what has been the local reaction; what was in it for the communities to make them interested
- Broader focus to specifically include transportation communities and issues.

Concern:

- “Preparing a discussion document” is too far away from actually implementing a siting process
- Few if any communities will come forward
- It will be difficult to get ordinary people involved
- That ‘fairness’ is not achievable.