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INITIAL COMMENTARY ON THE NUCLEAR WASTE MANAGEMENT  
ORGANIZATION DISCUSSION DOCUMENT "UNDERSTANDING THE CHOICES"

JIM SINCLAIR

PRESIDENT  
CONGRESS OF ABORIGINAL  
PEOPLES OF SASKATCHEWAN  
AND WITA DIRECTOR

PART I

ANALYSIS OF NWMO DISCUSSION DOCUMENT  
OF AUGUST, 2004- "UNDERSTANDING THE CHOICES"

THE NUCLEAR WASTE MANAGEMENT ORGANIZATION (NWMO) DISCUSSION DOCUMENT "UNDERSTANDING THE CHOICES", AFTER A SHORT "FOREWORD" FROM THE NWMO PRESIDENT, BEGINS WITH A 9 PAGE "EXECUTIVE SUMMARY". THIS IS FOLLOWED BY A MORE EXTENSIVE (3) PARTS ENTITLED:

- 1.) FOUNDATIONS OF THE ASSESSMENT
- 2.) A PRELIMINARY COMPARATIVE ASSESSMENT
- 3.) TOWARDS A MANAGEMENT APPROACH

"FIGURES AND TABLES", AND (5) APPENDICES. ROUND OFF THIS 110 PAGE DISCUSSION PAPER.

AS WE ARE TALKING ABOUT CANADA HERE, THIS NWMO PAPER BEGINS WITH AN EXAMINATION OF THE VALUES AND PRIORITIES OF CANADIANS, AS WELL, HOW NWMO HAS USED THIS UNDERSTANDING TO BUILD AN ASSESSMENT FRAMEWORK; AND ALSO TO COMPARE NUCLEAR WASTE MANAGEMENT APPROACHES.

IN PART I OF "UNDERSTANDING THE CHOICES", NWMO REPORTS BACK ON THE DIRECTION IT HAS RECEIVED FROM ITS' ENGAGEMENT AND RESEARCH ACTIVITIES TO DATE

THE NWMO APPROACH TO CANADIAN VALUES AND PRIORITIES IS REFLECTED IN ITS' (3) THREE "CORE AND PARALLEL ACTIVITIES". THAT IS,

- 1.) LAUNCHING OF A NATIONAL CITIZENS DIALOGUE, WORKING WITH THE CANADIAN POLICY RESEARCH NETWORK (CPRN), AND 462 UNAFFILIATED CANADIANS FROM ALL WALKS OF LIFE;
- 2.) WORKING WITH ABORIGINAL PEOPLE ON PLANNING FOR A VERY LONG TIMEFRAME, INVOLVING THE PRINCIPLES INHERENT IN ABORIGINAL TRADITIONAL KNOWLEDGE;
- 3.) CREATING A NWMO "ROUNDTABLE ON ETHICS" TO HELP DEVELOP NWMO ACTIVITIES WITHIN AN "ETHICAL AND SOCIAL FRAMEWORK". THIS ROUNDTABLE HELPS DIRECT NWMO ACTIVITIES, ASSESS MANAGEMENT APPROACHES, AND PROVIDES A CONSTANT REMINDER OF THE ETHICAL IMPERATIVE. SUCH AN ETHICAL IMPERATIVE IS ESSENTIAL, AS THE NWMO DISCUSSION DOCUMENT INDICATES:

"THROUGHOUT THE DIALOGUE WE HAVE HEARD AN EMERGING SENSE THAT THE ASSESSMENT OF MANAGEMENT APPROACHES WILL NECESSARILY INVOLVE DIFFICULT DECISIONS ABOUT PRIORITIES,

(2)

AND THE CONDITIONS UNDER WHICH TRADE-OFFS AMONG OBJECTIVES WOULD BE APPROPRIATE

TENSIONS DO, AND WILL CONTINUE, TO EXIST:

NWMO HAS BEEN TOLD TO CONSIDER SIX(6) ISSUES:

- 1.) A MORE PRECISE DESCRIPTION OF THE NATURE OF THE HAZARD POSED BY USED NUCLEAR FUEL TO HUMAN HEALTH AND THE ENVIRONMENT;
- 2.) A MORE PRECISE ACCOUNT OF THE NATURE OF THE RISK POSED BY TRANSPORTATION OF USED NUCLEAR FUEL;
- 3.) CLARIFICATION OF WHAT "SOCIAL ACCEPTABILITY" OR "PUBLIC CONFIDENCE" WILL ENTAIL;
- 4.) HOW THE ASSESSMENT IS AFFECTED BY THE VOLUME OF USED NUCLEAR FUEL, WHICH ULTIMATELY NEEDS TO BE MANAGED;
- 5.) OPPORTUNITIES TO REUSE OR RECYCLE NUCLEAR FUEL;
- 6.) OPPORTUNITIES TO SITE A DEEP DISPOSAL REPOSITORY IN GEOLOGIC MEDIA OTHER THAN THAT NOTED IN THE "NUCLEAR FUEL WASTE ACT";

IN PART II OF "UNDERSTANDING THE CHOICES", NWMO PROVIDES FULLER DESCRIPTIONS OF THE APPROACHES ON WHICH NWMO WILL FOCUS ITS STUDY. THIS INVOLVES HOW THE FRAMEWORK TO ASSESS THE APPROACHES HAS EVOLVED SINCE AN EARLIER NWMO DOCUMENT "ASKING THE RIGHT QUESTIONS". FINALLY, NWMO PRESENTS A PRACTICAL DEMONSTRATION OF THE FRAMEWORK THROUGH A PRELIMINARY ASSESSMENT OF THE MANAGEMENT APPROACHES.

NWMO, IN EARLY 2004, ASSEMBLED AN "ASSESSMENT TEAM", A MULTI-DISCIPLINED GROUP OF PEOPLE WHOSE PRELIMINARY FINDINGS ARE SET OUT IN THE NWMO DISCUSSION DOCUMENT. THESE FINDINGS INCLUDE THE STRENGTHS AND LIMITATIONS OF THE THREE METHODS OF STORAGE SET OUT IN THE "NUCLEAR FUEL WASTE ACT", THAT IS:

- 1.) AT REACTOR STORAGE
- 2.) CENTRALIZED STORAGE (EITHER ABOVE-GROUND OR SHALLOW BELOW GROUND);
- 3.) DEEP GEOLOGICAL REPOSITORY;

IN PART III OF "UNDERSTANDING THE CHOICES" NWMO TAKES STOCK OF WHAT THEY HAVE LEARNED TO DATE, AND IDENTIFY A PATH FORWARD

(3)

FOR THE NEXT PHASE OF THE NWMO STUDY.

THE PATH FORWARD- "WHAT NEEDS TO BE CONSIDERED? THE ASSESSMENT FRAMEWORK IS SET OUT IN TABLE E-2 OF THE NWMO DISCUSSION PAPER (ON PAGE 10). THE ORIGINAL 10 QUESTIONS FROM EARLIER NWMO WORK, HAVE BEEN SYNTHESIZED INTO (8) OBJECTIVES, AND ASSOCIATED GUIDING PRINCIPLES AND INFLUENCES-THIS CONSTITUTES THE ASSESSMENT FRAMEWORK.

NWMO NOW, WITH A NOVEMBER 15, 2005 DEADLINE TO PRESENT ITS RECOMMENDATIONS TO THE MINISTER OF NATURAL RESOURCES, IS ENGAGING CANADIANS ON THE MANY ELEMENTS OF THE ASSESSMENT OF MANAGEMENT OPTIONS. THIS INCLUDES THE PUBLIC, RESIDENTS OF NUCLEAR SITE COMMUNITIES, ABORIGINAL PEOPLE, AND INTERESTED ORGANIZATIONS AND INDIVIDUALS.

Congress of Aboriginal People of Saskatchewan  
Office of Jim Sinclair

Memo to: Richard Long

From: Jim Sinclair

**Re: Nuclear Waste Project**

I have had an opportunity to consider the engagement strategy agreed to at the WITA Executive meeting held in Winnipeg in November 2004. It was agreed that each affiliate of WITA would host a regional workshop which would provide a ~~forum~~ an opportunity to better inform our constituents on the vital issue of nuclear waste management, as well as to solicit their opinions regarding nuclear waste policies and processes currently employed by the Nuclear Waste Management Organization (NWMO). As you are aware, Saskatchewan will host its initial consultation on Wednesday, December 15, 2004, in Regina.

My immediate comments on the project and the process we have undertaken are as follows.

- Acknowledgement that consultations are required because of the potential impact on traditional lands, health and environment.
- The project is a valuable tool to assist in identifying the feelings of our Aboriginal constituents regarding nuclear waste.
- The process for the project outlines three phases:
  1. a public meeting before Christmas to introduce the project;
  2. the establishment of the consultation process with our communities, including the examination of existing nuclear management approaches taken by other Aboriginal people; and,
  3. the compilation of a final report which will include a process for ongoing consultations and information sharing.
- CAP Saskatchewan will utilize the survey process and public forums to capture the concerns and recommendations of our communities. The process utilized will be Fault Tree Analysis.
- There is an immediate need to design ongoing consultations.
- Information on nuclear waste must be understandable, transparent and presented in layman's terms, not based on technical language.
- Financial implications to facilitate this process need to be transparent in order to ensure its success.

I would also like to provide you with my initial commentary on the document, "Understanding the Choices". I have considered the ten questions you forwarded, however, find that they do not have "ready-made" answers and require a good deal of research in order to better understand methods currently employed for nuclear waste management. I am prepared to provide my personal responses if you require, however, I would like to provide you with a more generalized commentary.

Saskatchewan's interest is two-fold: firstly, approximately 30% of the uranium utilized comes from Northern Saskatchewan; and, secondly, there is extensive clean-up needed for the mines and communities which were utilized as the infrastructure to support the mining. This dialogue process is seen as a long-awaited opportunity by Saskatchewan's Aboriginal people to address their concerns regarding the historical lack of their involvement in decision-making regarding uranium mining (i.e., decisions to mine uranium on traditional lands).

There is a need for informational sessions to be available because of the technical nature of the material(s) being deliberated. Present use of nuclear energy as a source of energy and nuclear weapons development are not well-received initiatives. Protestations cannot be attributed strictly to fear of the subject of nuclear waste entirely but in many instances results from little or no consultation with Northern Saskatchewan stakeholders and the lack of readily-available information.

This memorandum and the ten questions you developed will be distributed to workshop participants for their consideration. They will have a better understanding of the serious nature of nuclear waste management and the decision processes utilized once they have had an opportunity to review their information kits and have heard your presentation. At the conclusion of the workshop and with your assistance, we will be in a better position to consider the participant dialogue and to answer the questions posed, thereby ensuring the input of our Aboriginal members.