



## Assembly of First Nations

# Memo

**TO:** Dr. Anda Kalvins  
Nuclear Waste Management Organization

**CC:** Pat Patton

**FROM:** Assembly of First Nations

**DATE:** May 23, 2008

**RE:** **Comments and ideas on implementing Adaptive Phased Management**

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Dear Dr. Kalvins;

This is in response to President Nash's letter of April 14, 2008 to National Chief Phil Fontaine. As requested, attached please find AFN's comments on "Implementing Adaptive Phased Management 2008-2012" and "Dialogue on Proposed Transparency Policy". We regret that we have missed the deadline of May 16, 2008. However, we are pleased to have this opportunity to offer comments and look forward to discussing options for further collaboration with NWMO in the near future.

Stuart Wuttke  
Acting Director, Environmental Stewardship  
Assembly of First Nations  
473 Albert Street, Suite 810  
Ottawa, ON, K1R 5B4  
(613) 241-6789 Ext 228



# AFN ENVIRONMENTAL STEWARDSHIP

RESPECTING AND PROTECTING MOTHER EARTH

## Implementing Adaptive Phased Management 2008 to 2012 Nuclear Waste Management Organization

### RESPONSE TO QUESTIONS:

- I. First, the draft Plan is built around objectives in seven key areas. Have we identified the right objectives? Have we missed key areas?

The seven key areas or strategic objectives are:

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

COMMENTS: We believe the right objectives have been identified. However, there may be missed objectives or additional clarifications that are needed. Also, it is difficult to determine if the suggestions (below) should be considered objectives or activities in response to an objective. Nevertheless, our comments are as follows:

1. 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.

Discussion: In order to build confidence, we believe that all possible scenarios (both positive and negative) concerning the long-term impact of nuclear fuel waste management, including its transportation and storage (current and future), should be examined. This should be done through focus groups or other gatherings of a cross-section of civil society, and the results published. The outcome of such focus groups would lead to the design of safeguards, which would increase confidence among those that may still harbor negative views towards implementation.

2. Develop a strategy for Aboriginal involvement in decision making and implementation.

Discussion: We believe that this is an important objective to consider as it is likely that the facility will be located on land that is under the jurisdiction of First Nations or is used or claimed by First Nations. Even if this is not the case, Aboriginal knowledge of the land, its fauna and flora, or the location of traditional sacred sites, makes Aboriginal participation in site selection an important consideration.

3. Establish a system and protocols for the best use of Aboriginal Traditional Knowledge in site selection and long-term monitoring and surveillance.

Discussion: The use of Aboriginal Traditional Knowledge (ATK), coupled with western scientific knowledge is important for establishing a long-term monitoring and surveillance program. A system where the two sets of knowledge complement one another and are on an equal footing has rarely been done effectively. However, it is an opportunity for NWMO to establish a program that demonstrates how this relationship can work and how Aboriginals can play an important role in its implementation. Not only is ATK important for site selection, environmental monitoring and surveillance purposes, it is an important element in assuring the public that the facility is operating safely. In addition, this system of protocols will have a significant spin-off in terms of other activities such as monitoring the effects of the potential adverse environmental impacts of global warming, migration of invasive species, chemicals in the environment and emergency response services. Also these protocol can be adapted for use as an early warning system for newly emerging plant and animal diseases and blights, or even a forest fire warning system – all important security issues.

4. 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.

Discussion: There will be several pros and cons to hosting the facility. However, for security reasons it is important that the host community and the

communities surrounding the host be politically and economically stable now and well into the future. The government or nuclear power industry is likely to promise financial gain and employment to the community that is selected to host the facility. However, this in itself does not guarantee long-term community acceptance as the “willing host” of such a facility. It should be understood that although a community is suitable today, that may not be the case in the future. To insure that security does not become an issue, options need to be discussed and plans developed. For example, effective decision making requires an educated public. Thus an NWMO scholarship trust fund could be developed. People need to be gainfully employed, thus a placement service should be developed – but one that focuses on developing local jobs perhaps in connection with the monitoring and surveillance program mentioned above, or in conjunction with ecotourism. A community needs to be healthy; thus quality medical services (both preventive and curative) need to be accessible to all. They need to be well informed, thus the community needs the best means possible to connect to the outside world via radio broadcasts, newspapers or newsletters and high speed internet. Other infrastructure such as access to nutritious food, safe drinking water and adequate wastewater treatment facilities, etc. should be part of the plan. In other words, the community that hosts the facility should be a model community, which is self-sufficient. Special training like the use of GIS and other useful technologies should be explored.

Other options might be assistance with developing ecotourism, implementation of green technologies (off-grid power and renewable energy) and the establishment of a disaster management program.

- II. Second, the draft Plan identifies work and activities we propose to undertake to accomplish these objectives. Have we set out appropriate activities?

COMMENTS: Integration of ATK into environmental assessment activity of lands that may or may not be claimed or used by First Nations is a priority. See above suggestions.

Website communications is only as good as those that can use it. For remote rural communities, high speed internet is almost out of the question and dial-up can be expensive. 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.

III. Third, what more would you like to know about the NWMO's draft Implementation Plan?

COMMENTS: 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.

IV. Please provide us with any comments on our draft transparency policy.

COMMENTS: Where information has been collected which has not previously been written down or copyrighted, care must be taken to obtain permission for its use. Where permission is required, such permission will be sought, even if the knowledge acquired is considered to be community property. In other words, give credit where credit is due. Any attempt to secure permission to publish or use the information collected, must be respectful of existing protocols and intellectual property rights. In the case of Aboriginal Traditional Knowledge, if permission is given to publish or use this information, the NWMO should secure a copyright or other protection and assist in securing remuneration (if applicable) on behalf of the knowledge holder(s).

As mentioned above, photographs or videos of NWMO activities would also help develop an atmosphere of transparency while sharing knowledge.

There is no such thing as over communicating.