

CNSC Table: Consolidated Public and Indigenous Groups' Comments on the Near Surface Disposal Facility Project Draft EIS

Tableau pour la CCSN: Commentaires consolidés du public et des groupes autochtones sur l'ébauche de l'EIE du Projet d'installation de gestion des déchets près de la surface

No.	Source	<p align="center">Comment Summary (all original submissions can be found on the Canadian Environmental Assessment Registry, reference #80122)</p> <p align="center">Synthèse des commentaires (toutes les soumissions originales se trouvent sur le Registre canadien d'évaluation environnementale, référence #80122)</p>	<p align="center">Response (to be completed by CNSC) Réponse (à remplir par la CCSN)</p>
<p align="center"><i>Note: The following comments and questions have been summarized, and in some cases, consolidated. The CNSC will respond in the same language chosen by the commenter.</i></p> <p align="center"><i>Note: Les commentaires et questions suivant ont été résumés, et dans certain cas, consolidés. La CCSN répondra dans la même langue que l'intervenant.</i></p>			
<p align="center">Alternative Means of Carrying Out the Project</p>			
1.	Denise Anne Walker (May 8, 2017)	Canadian Nuclear Laboratories (CNL) describes the Nuclear Surface Disposal Facility (NSDF) (engineered containment mound, ECM) as being similar to the Port Hope storage project. <ul style="list-style-type: none"> a) Does the CNSC recognize that a long term managed storage facility is different from a disposal facility? b) How does this difference impact the EA process? 	
2.	Craig Robinson (August 15, 2017)	There is a huge controversy regarding the construction of a Deep Geological Repository in the Kincardine Ontario area near Lake Huron to dispose of reactor waste. If this does not go through will Chalk River become a candidate for this too? AECL/CNL has already quietly, with no public input done a \$30 million feasibility study on the Chalk River property for a Deep Geological Repository.	
3.	Patrick Galligan (August 15, 2017)	Choosing this site will create tremendous discord within communities along the Ottawa River and litigation in the courts for years to come. I ask that you make a wise choice that will benefit us all, and not approve the proposal.	
<p align="center">EA Process</p>			
<p align="center">EA Process - General</p>			
4.	Michael McBane (August 16, 2017)	Assumptions about what level of risk is "acceptable" must not be the basis of the environmental assessment of this project. The risk assessment process commonly used to assess nuclear safety has been developed by and for industry and the "experts" it employs and finances. It is fatally flawed because it claims to establish something not supported by scientific evidence - an acceptable level of risk for nuclear radiation.	

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		<p>Any proposal to fix the serious problem of current storage of radioactive materials at the Chalk River site needs to be founded on the assumption that there is no such thing as an acceptable level of radiation in drinking water.</p> <p>The commenter requests that the CNSC base the environmental assessment of this proposal on the criterion of safety and not the assumption of "acceptable level of risk." The risk assessment method is inappropriate, especially for nuclear technology, because the level of risk is unknown, potentially uncontrollable and catastrophic. Also, radiation in drinking water is an example of involuntary risk.</p>	
5.	<p>John Almstedt (August 16, 2017)</p> <p>Martine Ouellet (Bloc Québécois) (August 14, 2017)</p> <p>Durham Nuclear Awareness (August 16, 2017)</p> <p>Dr Éric Notebaert, Association canadienne des médecins pour l'environnement (ACME) (August 11, 2017)</p> <p>Provincial Council of Women of Ontario (PCWO) (August 16, 2017)</p>	<p><i>Concerns on this topic were expressed by more than one commenter and comments have either been summarized, or included as excerpts from commenter submissions. Given that there were comments on this topic submitted in both English and French, the comment summary below is provided in both official languages, and a response in both official languages will also be provided.</i></p> <p><i>Des préoccupations à ce sujet ont été exprimées par plus qu'un intervenant et les commentaires ont été résumés ou inclus sous forme d'extraits de commentaires. Étant donné que les commentaires sur ce sujet ont été soumis en anglais et en français, le synthèse des commentaires ci-dessous est fourni dans les deux langues officielles et une réponse dans les deux langues officielles sera également fournie.</i></p> <p>[English] Several commenters express the view that the EA process under which this project has been put forward is deeply flawed, and indeed the federal government is currently engaged in reforming it. A few commenters raise the following questions:</p> <ul style="list-style-type: none"> • Why was the EA process not revisited once there was a change of government? • Why wasn't this project held off on until the EA process was modernized to ensure a process for this project that is more respectful of the necessity of social acceptance? • Why wasn't the EA directed to an independent arms-length panel? <p>Some commenters request a new EA process for the following reasons:</p>	

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		<ul style="list-style-type: none"> • Leaving the decision for the location, design and use of the Chalk River dump in the hands of a multi-national private profit oriented consortium with no political oversight is most inappropriate for a health and safety decision that will affect people and perhaps the environment over the next 1000 years. • The ongoing environmental assessments of the three radioactive projects lack legitimacy: they are hampered by serious flaws in CEAA 2012 identified in the April 2017 report of the Expert Panel to review federal environmental assessment processes. <p>Canadian Environmental Assessment Act (CEAA) 2012 does not provide early and ongoing public participation opportunities that are open to all, does not ensure that information is easily accessible and permanently and publicly available and gives the Canadian Nuclear Safety Commission sole authority to decide if a nuclear project will cause significant adverse environmental effects. This is not appropriate for a democratic country where a decision on nuclear waste will have such a long term impact and could affect the drinking water of millions of people.</p> <p>[Français] Plusieurs commentateurs estiment que le processus d'évaluation environnementale en vertu duquel ce projet a été présenté comprend beaucoup de lacunes – en fait, le gouvernement fédéral s'emploie actuellement à le réformer.</p> <p>Quelques commentateurs posent les questions suivantes:</p> <ul style="list-style-type: none"> • Pourquoi le processus d'ÉE n'a-t-il pas été revu encore à l'occasion du changement de gouvernement et des promesses que le premier ministre a fait? • Pourquoi ce projet n'attend-il pas la modernisation des ÉE, tel que promis par le premier ministre, mais toujours pas réalisé pour assurer un processus plus respectueux des nécessités de l'acceptation sociale ? • Pourquoi le processus d'ÉE n'a-t-il pas été référé à un comité indépendant? <p>Certains commentateurs demandent qu'un nouveau processus d'évaluation environnementale soit créé, invoquant les raisons suivantes :</p>	

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		<ul style="list-style-type: none"> • Laisser la décision concernant l'emplacement, la conception et l'utilisation de la décharge de Chalk River entre les mains d'un consortium multinational à but lucratif sans contrôle politique est tout à fait inapproprié pour prendre une décision en matière de santé et de sécurité qui touchera les personnes, voire l'environnement, pour les 1 000 prochaines années. • Les évaluations environnementales en cours des trois projets radioactifs manquent de légitimité : elles sont entravées par de graves lacunes dans la LCEE 2012 identifiées dans le rapport d'avril 2017 du groupe d'experts chargé d'examiner les processus d'évaluation environnementale fédéraux. • La LCEE 2012 ne permet pas une participation du public précoce et continue ouverte à tous, ne garantit pas d'accès permanent de l'information au public et délègue à la Commission canadienne de sûreté nucléaire (CCSN) le pouvoir exclusif de décider si un projet nucléaire aura de graves répercussions environnementales. Cela n'est pas approprié pour un pays démocratique où une décision sur les déchets nucléaires aura un impact à long terme et pourrait contaminer l'eau potable de millions de personnes. 	
6.	Metis Nation of Ontario (August 16, 2017)	<p>It is unclear from this draft Environment Impact Statement (EIS) who is responsible for ensuring that all requirements of a Canadian Environment Assessment Agency are met. Will this be confirmed through review by CEAA or will this be completed by CNSC?</p> <p>Further, the requirements for a CNSC, EA are unclear. For example, the Project did not seem to have EIS Guidelines prepared, a key component of a CEAA 2012 assessment and instead relied on a Project Description which is a typical component of the National Energy Board process.</p> <p>Please clarify the regulatory approvals process for this Project.</p>	
Facility Design			
Facility Design – General			
7.	Cody Cuthill (August 4, 2017)	<p>The CNSC should define its interpretation of what are considered low concentrations. Other member countries have defined this as 10 Bq/g as noted in item 3 below. (Please see the submission for more information and</p>	

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		references to the IAEA documentation, p.3).	
8.	Emma March (August 15, 2017)	The Canadian legal system operates on a basis in which you are innocent until proven guilty beyond a shadow of a doubt. This is because it is seen as far worse to convict and punish an innocent man than to not punish a guilty one. Applying that same reasoning to waste decommissioning projects, should it not be evaluated on a basis in which you must prove beyond a shadow of a doubt that the facility is safe and robust? Is it not seen as worse to have a design that has the possibility for problems affecting public and environmental safety rather than a more expensive but safer design?	
Facility Design – Engineered Containment Mound			
9.	Canadian Coalition for Nuclear Responsibility (CCNR) (August 16, 2017)	For the CNSC to approve such a proposal will send a terrible signal to the rest of the world. Imagine if everyone starts abandoning their radioactive wastes and other toxic wastes in large mounds right beside major bodies of water, all over the world. A viable, more responsible alternative approach would require more modular packaging with painstaking documentation listing the radioactive inventory of each package. When a package starts leaking, our descendants will be able to identify the offending package, ascertain its contents, and repackage the contents in a more secure fashion. It must be considered as an intergenerational responsibility, not a “one-shot deal”. And the planning must include the principle of “Rolling Stewardship” as an active and essential aspect of the long-term management of radioactive wastes.	
Facility Design – Base Liner			
10.	Cody Cuthill (August 4, 2017) Emma March (August 15, 2017)	<p><i>Concerns on this topic were expressed by more than one commenter, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p> <p>The EIS outlines the NSDF to be an EMC, no more robust or different than other hazardous waste landfills as outlined in 2.2(3) of the GSG-1 for very low level waste only.</p> <p>Other facilities licensed to accept Naturally Occurring Radioactive Materials are built to a more robust nature, such as the Silverberry Landfill near fort St. John BC. This facility has two .6 m compacted clay liners and in the middle of these is a leachate detection system. The Ontario Ministry of Environment landfill design</p>	

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		<p>criteria also allows for hazardous waste into a two liner system (See Diagram in Cody Cuthill's submission from August 4, p. 5).</p> <p>The NSDF is planned with only a 0.75 m clay liner; the minimum requirements for landfill design in Ontario. To accept low level waste the CNSC should consider ensuring several liner systems including the double composite liner as described above in the Ontario landfill design guideline. This minimum clay thickness should be increased to ensure public confidence. In addition the CNSC should ensure each liner system has a leachate detection system below it to verify its integrity and future performance.</p>	
Integrated Waste Management			
Integrated Waste Management - General			
11.	Greenpeace (August 16, 2017)	<p>The CNSC has failed to establish a clear and credible categorization system for radioactive waste. This prevents open and trustworthy public discussions related to the hazard posed by proposed radioactive waste facilities. This, in turn, prevents drawing any credible conclusions as to whether such a proposed facility may have a social licence to operate.</p> <p>In 2006, Greenpeace filed a petition through the Office of the Auditor General of Canada to highlight the absence of a categorization system for non-fuel radioactive waste in Canada. The CNSC's response was evasive.</p> <p>As highlighted by the submission of Concerned Citizens of Renfrew County (CCRC), the CNSC still lacks a credible categorization system for radioactive waste. Comparing the radioactive wastes CRL hopes to dump in the NSDF with the classification system recommended by the IAEA, CCRC observes an acceptance of the NSDF by the CNSC would likely violate international safety standards. Greenpeace agrees.</p> <p>The root issue is the CNSC's failure to establish a clear classification system, aligned with IAEA standards, for non-fuel radioactive wastes. This hampers the ability of the public – as well as the CNSC – to objectively and fairly assess the acceptability of projects like the NSDF.</p>	

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Integrated Waste Management – NPD Site			
12.	Evelyn Gigantes (May 17, 2017)	The NRU/NPD site is a major contamination source. Why is there no effort to focus on the particular waste problems raised by the site of the old reactor? And what might be alternative methods or alternative locations for dealing with: 1) The contaminated remains and surrounds of the reactor, and/or 2) Other radiological waste for which CNL has undertaken a contractual responsibility?	Out of scope of this EA.
International Standards and Guidance			
13.	PCWO (August 16, 2017)	Why has CNSC staff not flagged CNL's flouting of the International Atomic Energy Agency (IAEA) Safety Standard SSR-5 Disposal of Radioactive Waste on Nuclear Waste management, which disallows this type of "mound" as containment for intermediate radioactive waste, with long-lasting radioactive elements?	
Aboriginal Consultation			
14.	Kitigan Zibi Anishinabeg (May 11, 2017) Grand Council Chief Madahbee (Anishinabek Nation) (August 16, 2017)	Kitigan Zibi never gave up nor sold traditional ancestral territory. Their territory has never been under treaty and is subject to Algonquin Aboriginal Title. This implies the need for our consent for all development projects on our lands.	
15.	Evelyn Gigantes (May 17, 2017)	The approach that has been made to Indigenous groups with an interest in whether the project proceeds is painful to examine. The Indigenous community with the most immediate concern is that of the Algonquins of Pikwakanagan First Nation. Chief Whiteduck's letter to Patrick Quinn in 2016 is moving testimony to the struggles of the Indigenous community with the closest interest in the project(s), and the need for the CNSC to correct a process which attempts to force Indigenous peoples in the area into a fast-paced approval of the current CNL proposal.	

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16.	Grand Chief, Algonquin Anishinabeg Nation Tribal Council (AANTC) (May 12, 2017)	<p>The potential impacts on our traditional territory are severe, and it would affect our people for many generations to come. As stewards of the land, we cannot accept the inherent risk associated with the storage of radioactive waste within our traditional territory.</p>	
17.	Hiawatha First Nation (April 18, 2017)	<p>This project by its very nature has the potential to bring about momentous and long-lasting impacts on the natural environment. Any infringement on Treaty rights must be justified by the Crown.</p>	
18.	Joan Lougheed and Town of Deep River (August 16, 2017)	<p>The draft EIS confirms that the NSDF project occurs within the general area of the Algonquin land claim (see pg. 5-596). The Supreme Court of Canada held in <i>Haida Nation v. British Columbia (Minister of Forests)</i> [2004] 3 S.C.R. 511 [<i>Haida</i>] that there may be a duty to consult and accommodate Aboriginal communities.</p> <p>One of the Algonquin communities, the Algonquins of Pikwakanagan, have written to CNL objecting to the NSDF (see Appendix 4.0-31), and have been identified for engagement activities because they have a comprehensive land claim (see pg. 4-13, Table 4.3.2-1). The duty to consult is automatically triggered when government has knowledge of real or asserted Aboriginal or treaty rights and is making a decision that may adversely impact the exercise of those rights.</p> <p>While the project proponent (CNL), as a third party, is not legally responsible for fulfilling the duty to consult, government often directs the proponent to take on procedural aspects of the process. Proponents are also expected to develop accommodation mechanisms in cases where the original design of a project would cause severe or irreversible harm to Aboriginals' rights. The regulator (CNSC) will then be responsible to determine if consultation and accommodation has been appropriate, in the circumstances.</p> <p>It is unknown whether CNL has responded to the Algonquins of Pikwakanagan's letter or if CNL intends to engage with the Algonquins of Pikwakanagan in any meaningful consultation, or to provide them accommodation regarding the NSDF in accordance with Canadian law. Table 4.3.2-2 details emails, letters, voicemails, telephone calls and meetings that CNL has had with several First Nation communities; however, it is unclear from the chart whether the correspondence has been meaningful.</p> <p>The Town of Deep River urges the CNSC to strongly examine whether local Aboriginal groups and First Nation communities have been appropriately consulted and accommodated with respect to the NSDF project,</p>	

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		and if so, does the draft EIS correctly represent the outcome of those consultations and accommodations.	
19.	Grand Council Chief Madahbee (Anishinabek Nation) (August 16, 2017)	The Anishinabek Nation vehemently object to the proposed NSDF. The Anishinabek Nation has not been consulted regarding this project which is located within our territory. We demand that free, prior and informed consent is required to ensure that no storage or disposal of hazardous materials shall take place in First Nations lands and territories.	
20.	Angela Bischoff (August 16, 2017)	<p>In a Joint Declaration by the Anishinabek Nation and the Iroquois Caucus on May 2, 2017, five principles were laid down as guidelines for the long-term management of radioactive wastes. I endorse these principles and expect our government institutions to do likewise.</p> <p>1. No Abandonment: Radioactive waste materials are damaging to living things. Many of these materials remain dangerous for tens of thousands of years or even longer. They must be kept out of the food we eat, the water we drink, the air we breathe, and the land we live on for many generations to come. The forces of Mother Earth are powerful and unpredictable and no human-made structures can be counted on to resist those forces forever. Such dangerous materials cannot be abandoned and forgotten.</p> <p>2. Monitored and Retrievable Storage: Continuous guardianship of nuclear waste material is needed. This means long-term monitoring and retrievable storage. Information and resources must be passed on from one generation to the next so that our grandchildren's grandchildren will be able to detect any signs of leakage of radioactive waste materials and protect themselves. They need to know how to fix such leaks as soon as they happen.</p> <p>3. Better Containment, More Packaging: Cost and profit must never be the basis for long-term radioactive waste management. Paying a higher price for better containment today will help prevent much greater costs in the future when containment fails. Such failure will include irreparable environmental damage and radiation-induced diseases. The right kinds of packaging should be designed to make it easier to monitor, retrieve, and repackage insecure portions of the waste inventory as needed, for centuries to come.</p> <p>4. Away from Major Water Bodies: Rivers and lakes are the blood and the lungs of Mother Earth. When we contaminate our waterways, we are poisoning life itself. That is why radioactive waste must not be stored</p>	

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		<p>beside major water bodies for the long-term. Yet this is exactly what is being planned at five locations in Canada: Kincardine on Lake Huron, Port Hope near Lake Ontario, Pinawa beside the Winnipeg River, and Chalk River and Rolphton beside the Ottawa River.</p> <p>5. No Imports or Exports: The import and export of nuclear wastes over public roads and bridges should be forbidden except in truly exceptional cases after full consultation with all whose lands and waters are being put at risk. In particular, the planned shipment of highly radioactive liquid from Chalk River to South Carolina should not be allowed because it can be down-blended and solidified on site at Chalk River. Transport of nuclear waste should be strictly limited and decided on a case-by-case basis with full consultation with all those affected. "</p>	
Public and Aboriginal Engagement			
Public and Aboriginal Engagement - General			
21.	Valerie Needham (August 15, 2017) Patrick Galligan (August 15, 2017) Irene Boland and Mark Barnes (August 15, 2017) Sylvie Pilon-Tiden (August 15, 2017) Denise Roberge (August 15, 2017) Louise Labrosse (August 15, 2017) Angela Solar (August 14, 2017) JoAnne Hungate	<p><i>Concerns on this topic were expressed by more than one commenter, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p> <p>Take the grave concerns regarding this proposed facility seriously. Careful and considered objections have been submitted by worried lay people and credible scientists. Their questions and legitimate concerns are well articulated in the many submissions posted on the Canadian Environmental Assessment Agency website, and should be taken into consideration.</p>	

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	(August 14, 2017) Robert M. Daisley (August 14, 2017) Dennis Higgison (August 14, 2017) Catherine Galligan (August 14, 2017) Natalie Robinson (August 14, 2017) Marilee DeLombard & Robert Wills (August 16, 2017) Sheila Allwright and Ellen Cameron (August 16, 2017) Mike Schreiner (August 16, 2017) Sharon Thorne (August 16, 2017) PCWO (August 16, 2017)		
22.	William Turner (May 31, 2017)	CNSC should remind CNL of the requirement to address all comments received and include the dispositions to those comments in the EIS	
23.	Joan Lougheed and Town of Deep River (August 16, 2017)	Further to our previous discussions at the CNSC 101 presentation in Deep River, I respectfully request that the Public Hearing be held in the Town of Deep River. We would be pleased to work with you to select a suitable venue.	
Public Engagement - Transparency			
24.	PCWO (August 16, 2017)	The commenter recommends that CNSC be more inclusive, transparent and thorough as it initiates its first independent Environmental Assessment under the 2012 Canadian Environmental Assessment Act (CEAA), and the Canadian Nuclear Safety and Control Act, as a "prerequisite" of the CNL "licencing process 6.	

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		<p>PCWO has been an intervenor at several comprehensive, intervenor –friendly hearings of independent Commissions, Boards and Environmental Assessment Panels over many years 7. Regrettably, the CNSC has not ensured that many of the public who might be most affected would hear about the project, and others received incomplete, shifting, conflicting, and hence, confusing CNL plan reports.</p>	
Participant Funding			
25.	<p>Grand Chief, AANTC (May 12, 2017)</p> <p>Algonquin Anishinabeg Nation Tribal Council (August 14, 2017)</p> <p>R. Donald Maracle (Mohawks of the Bay of Quinte) (August 16, 2017)</p>	<p><i>Concerns on this topic were expressed by more than one indigenous group, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p> <p>The AANTC have expressed issues with the funding being provided and the timelines to review the material.</p> <p>The AANTC had estimated that a proper consultation would cost at least \$70,000, in order to properly meet, have the documents received and translated, to hire experts to provide advice. Only \$20,000 was provided – this is not close to what is needed to cover the cost of a proper consultation. With this amount they are only able to meet once, cannot translate documentation and must use research being provided to other organizations. This does not allow them to meet with the experts, to have our questions / concerns raised or answered. Also cannot afford a study for how this could affect their aboriginal rights (protected by the laws of this country).</p> <p>Without proper funding the Mohawks of the Bay of Quinte were unable to retain the services of relevant experts and so meetings with CNL and CNSC representatives providing broad information and assurances could not be relied on to address community concerns in any meaningful or comprehensive way.</p>	
Public Participation			
26.	<p>Heather Sanderson (May 12, 2017)</p>	<p><i>Concerns on this topic were expressed by more than one commenter, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p>	

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	<p>Jake Deacon (Petawawa Point Cottagers Association) (May 16, 2017)</p> <p>Simon Bullivant (May 13, 2017)</p> <p>Ronald and Michele Kaulbach (May 8, 2017)</p>	<p>We should not be rushed into making a catastrophic decision based on economics and convenience.</p> <p>Timing of the announcement and deadline for public input suggest an effort to rush a program into place without intention of fully disclosing the risks involved to the community.</p> <p>There are absolutely no comparable forerunners in this field. You will be making decisions under a great deal of uncertainty. You have an obligation to tell people what you do not know and cannot predict: climate changes; forces of nature; the power of water; the reaction of such mixtures of nuclear wastes; unforeseen human error or intervention, increased seismic action.</p>	
27.	<p>Denise Anne Walker (May 8, 2017)</p>	<p>Does the CNSC recognize that it has responsibility in ensuring that any disposal site has the willing consent of the host community?</p>	
28.	<p>Simon Bullivant (May 13, 2017)</p>	<p>In light of the incredibly long term consequences of this proposal, decision should be based on:</p> <p>Consultation with all stakeholders: For such a big decision with long term consequences, there should be detailed public consultation. This should be at several stages of the process, not just a time limited invitation to submit views which may or may not be taken into account. For example, there should be consultations which (i) give the public a chance to express concerns, (ii) permit input into how those concerns might be addressed, and (iii) present the findings of independent reports that might be commissioned</p>	
29.	<p>Denise Anne Walker (May 8, 2017)</p>	<p>Is the CNSC aware of the importance of ensuring the process to establish a disposal site is done so that it a) engenders public trust, b) has community buy-in, and c) meets or exceeds internationally-recognized standards?</p>	
30.	<p>Evelyn Gigantes (May 17, 2017)</p> <p>David Herbert (May 2, 2017)</p>	<p>Several commenters have expressed the view that CNSC's public participation process has been inadequate with respect to providing adequate time for the review of the EIS given its length and complexity.</p>	

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31.	<p>Jake Deacon (Petawawa Point Cottagers Association) (May 16, 2017)</p> <p>Laurie Wagner (August 15, 2016)</p> <p>Angela Bischoff (August 16, 2017)</p>	<p><i>Concerns on this topic were expressed by more than one commenter, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p> <p>We are asking for an immediate delay of the proposal timeline and an extension on the time period for the public to make inquires and provide feedback on the proposal. If the proposal is sound and the intentions of the corporate entity behind the proposal are true then there is no long term threat to the proposal by allowing additional time for the public to become comfortable with it.</p> <p>Changes made to the <i>Canadian Environmental Assessment Act</i> removed the Ministry of the Environment and gave sole decision-making power to the Canadian Nuclear Safety Commission (CNSC) for this project. Canadian taxpayers are footing the bill for cleaning up nuclear waste. Therefore, proper responsibility, assessments and timetables need to be part of the process. I don't feel adequate time has been allowed for proper public consultation.</p> <p>The Canadian Nuclear Safety Commission (CNSC), an unelected body, has sole responsibility for project approval. It has never to date refused a licence application.</p>	
32.	<p>Denise Anne Walker (May 8, 2017)</p>	<p>a) Will the CNSC require another round of public consultations following the issuance of the final EIS? b) Will there be an opportunity for public comment once the environmental assessment (EA) is complete? c) Will the CNSC ensure that there is adequate time for public review in light of CNL's aggressively short timelines? d) Is there an appeal process if the CNSC's final decision is not reflective of the CNSC's policies and procedures, or applicable acts and regulations? e) Per the requirements of Section 3.3.4 of the Generic Guidelines for the Preparation of an Environmental Impact Statement, when will the CNSC be posting all the documents that are referenced in the EIS and its supporting documents? f) How will the CNSC evaluate whether the proponent has met the requirements of Section 3.2 of the CNSC's Generic Guidelines for the Preparation of an Environmental Impact Statement? Particularly with respect to:</p> <p align="center"><i>The EIS will document how scientific, engineering, traditional and local knowledge were used to</i></p>	

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		<p><i>reach conclusions. Assumptions will be clearly identified and justified. All data, models and studies will be documented such that the analyses are transparent and reproducible. All data collection methods will be specified. The uncertainty, reliability and sensitivity of models used to reach conclusions must be indicated. The sections in the EIS regarding the existing environment and the potential adverse environmental effects predictions and assessment must be prepared, using best available information and methods, to the highest standards in the relevant subject area. All conclusions must be substantiated.</i></p> <p>g) If it is determined that the requirements of Section 3.2 of the Generic Guidelines for the Preparation of an Environmental Impact Statement have not been met, what actions will the CNSC take?</p>	
33.	Jennifer Jimmo (August 16, 2017)	There was no guidance or FAQs provided to assist the public in preparing their submissions. Some valuable information could have been: who to direct said comments to, what to include and what not to, what to focus on and what not to, where to start and where to end, what to do when it is finished. For further example, it may have been beneficial for the public to have been guided to focus their review on the Valued Components section and whether all VCs had been adequately identified. Also include a clear purpose for why the public is being asked to participate in this EA and what will come of our efforts.	
Environmental Effects			
Environmental Effects - General			
34.	John Jackson (Nuclear Waste Watch and Old Fort Williams Cottagers' Association (OFWCA)) (August 11, 2017)	From the very beginning of its operating life in the mid-1940s, Chalk River Laboratories has generated, and/or received from other nuclear facilities, large quantities of radioactive wastes of a wide variety of types and activities. Furthermore, for many years these wastes were not handled or disposed of in ways that would meet modern-day standards of safety or environmental protection. Indeed, many highly radioactive liquid wastes were simply poured into unlined excavated trenches and capped with sand or soil – a practice that continued well into the 1960s. Infiltration of radioactive species such as H-3, Sr-90, Cs-137, Pu-239, etc, into the groundwater at these disposal sites has created contaminated plumes that currently extend over a surface area greater than 1 km ² and continue to spread.	

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		<p>Inspection of the layout of the CNL site shows that many of these highly contaminated disposal areas will be within 2 kilometers of the proposed location of the NSDF project site, and include waste management areas (WMAs) A, B, D, E, G and H, as well as other designated disposal areas such as Reactor Pits 1 & 2, the Chemical and Laundry Pits and the so-called Tank Farm. Without a full mapping of the extent and level of contamination of these pre-existing radioactive plumes, the amount of leakage from a newly-built NSDF will be impossible to quantify. I am therefore, urging that a complete and comprehensive site contamination survey be conducted, and the results made available to the public, before any decision is made to proceed with the proposed NSDF Project.</p>	
Monitoring and Follow-up Programs			
35.	Martin Flood (May 31, 2017)	These operations have the potential to create airborne contaminated dust. CNSC staff must establish, dictate and monitor how these operations are to be carried out in order to prevent this from happening.	
EIS Deficiencies			
36.	Northwatch (August 16, 2017)	We make three requests of the Canadian Nuclear Safety Commission: <ul style="list-style-type: none"> - require CNL to respond to information gaps and deficiencies and questions raised by public intervenors and review participants before the review proceeds - require CNL to resubmit a revised draft EIS after the above step has been completed, and make it subject to a public review and review by the federal departments in a manner similar to the review closing August 16th - review the protocol between CNSC and CNL in an open and transparent manner, engaging the public and Indigenous peoples in a process that leads to a revision of the protocol, including and particularly the timeline, to improve the review process and better accommodate the level of public and Indigenous interest and better reflect lessons learned in this process to date 	

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37.	Regroupement national des conseils régionaux de l'environnement du Québec, de la Fondation David Suzuki et d'Équiterre (August 16, 2017)	<p><i>Please note that this comment was submitted in French, and therefore a response in French will be provided.</i></p> <p><i>Veillez noter que ce commentaire a été soumis en français, et une réponse sera donc fournie en français.</i></p> <p>La CCSN devra refuser le projet d'IGDPS parce que l'importance de la rivière des Outaouais n'a pas été considérée à sa juste valeur.</p>	
38.	Jennifer Jimmo (August 16, 2017)	<p><u>On Designated Projects:</u> The term suggests that it is already a known and given this project's activities will likely cause significant adverse effects on the environment within a federal jurisdiction. This has never been in doubt or question, just as stopping or slowing this project in <i>any way</i> as a result of any significant adverse effects pointed out in the public comment submissions looks to have never been an option.</p>	
39.	Jennifer Jimmo (August 16, 2017)	<p><u>On the Generic Guidelines for Preparing an EIS:</u> No supporting documentation or external links provided such as a Glossary of Terms or suggestions to see "Frequency Asked Questions" to assist the public in understanding the complex terms or the technical requirements in this document. No helpful "For Example" scenarios provided to help clarify complex technical requirements being conveyed. Most other complex documents have such, especially guides and guidelines. Bibliography provided doesn't provide a complete list of all documents and records or related links to external websites mentioned in this document for cross-referencing purposes.</p> <p>The Guidelines fail to adequately guide the public reader or reviewer towards a clear understanding of the requirements being asked of in the proponent EIS.</p>	
40.	Jennifer Jimmo (August 16, 2017)	<p>Were the CNSC, at this point, to assist the proponent to address deficiencies, it would be a waste of taxpayers' money and the time and energy of citizens and elected representatives who will then have to step in to the policy and regulator void to stop this project from going forward. CNSC would thereby cement the perception that it is incapable of carrying out its mandate and that nuclear governance is in dire need of reform in Canada.</p>	

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EIS Terminology and Definitions			
41.	Cody Cuthill (August 4, 2017)	<p>The Classification of Radioactive Wastes GSG-1 outline Low Level waste as noted above to contain only long lived radioactive concentrations at relatively low level of concentrations. The assessment does not comply with this. A symposium for naturally occurring radioactive materials - NORM addresses long lived radionuclides that are acceptable for landfilling into facilities typical of the robustness as described in the impact statement. This outlines other IAEA member countries are limiting these radionuclides to 10 times the exemption value of the country as noted below.</p> <p>The CNSC formally excluded NORM from its mandate in October 2000 without first ensuring provincial waste management regulators were familiar with radioactive materials. These regulators will follow the CNSC's decision to accept high level waste into its hazardous waste landfills. This will result in high levels of long lived radionuclides in hazardous waste landfills throughout Canada. The CNSC should formally set values as to what the IAEA recommends are relatively low concentrations to prevent this from occurring.</p> <p>[See Cody Cuthill's submission from August 4, p.4 - 5 for the full reference].</p>	
Credibility			
42.	Ronald and Michele Kaulbach (May 8, 2017)	<p>As Carl Sagan said "Science is a way of thinking, much more than it is a body of knowledge." Science should not be a list of facts, arrogantly put forth by scientific researchers, funded by, and overseen by the Government.</p> <p>We were also very disturbed last week by the little rubber "nuclear watchdog" and the container of pills (candy, I found out later, not the potassium pills we heard about!) that were distributed at the CNL meeting in Sheenboro. We found this to be in very bad taste.</p>	
43.	PCWO (August 16, 2017)	Why did CNSC staff not recognize and flag the significant risks of intermediate nuclear wastes?	

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44.	<p>Jutta Spiettstoesser (August 13, 2017)</p> <p>STOP Oléoduc Outaouais (August 15, 2017)</p> <p>Mario Gervais (August 16, 2017)</p> <p>Dr Éric Notebaert (ACME) (August 11, 2017)</p> <p>Martine Ouellet (Bloc Québécois) (August 14, 2017)</p> <p>Regroupement national des conseils régionaux de l'environnement du Québec, de la Fondation David Suzuki et d'Équiterre (August 16, 2017)</p> <p>Jennifer Jimmo (August 16, 2017)</p> <p>Judith Lacroix (August 16, 2017)</p> <p>Lynn Jones (August 16, 2017)</p>	<p><i>Concerns on this topic were expressed by more than one commenter and comments have either been summarized, or included as excerpts from commenter submissions. Given that there were comments on this topic submitted in both English and French, the comment summary below is provided in both official languages, and a response in both official languages will also be provided.</i></p> <p><i>Des préoccupations à ce sujet ont été exprimées par plus qu'un intervenant et les commentaires ont été résumés ou inclus sous forme d'extraits de commentaires. Étant donné que les commentaires sur ce sujet ont été soumis en anglais et en français, le synthèse des commentaires ci-dessous est fourni dans les deux langues officielles et une réponse dans les deux langues officielles sera également fournie.</i></p> <p>[English] CNSC works hand in hand with the nuclear industry, and has even extended a PFP deadline of an industry supportive scientist without making it known to the general public.</p> <p>The EIS does not discuss the potential for conflicts of interest between the proponent and institutions responsible for applying the monitoring and the maintenance of the NSDF. Also, since the Chalk River site operations were transferred from Atomic Energy of Canada Limited (AECL) to CNL under the last government, it has become clear that the economics of the project have guided its development and design. Accidents and malfunctions should be the primary focus but are instead seemingly excluded. Any final decision should belong to elected representatives and not private interests. The CNSC should have limited decision making for nuclear projects and instead involve the minister of the environment.</p> <p>Why is the CNSC, made up of non-elected members, the only authority able to approve nuclear projects? This effectively eliminates any intervention from the Minister of the Environment. It seems as though this project was already completely decided upon and then announced.</p> <p>CNL's VP of decommissioning projects stated that the proponent is aware that the CNSC never declines a licence application, it simply rubber stamps the proponents projects as it has been proposed/designed. This project should be an opportunity for the CNSC to put its foot down and demand a better engineered solution to deal with the waste.</p>	

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		<p>This project should be postponed until the new EA legislation is enacted as it was recommended that the sole decision-making authority on nuclear projects be taken away from the CNSC and be given to an independent impact assessment authority. CNSC has also shown that it suffers from “regulatory capture” in which a regulator favours the industry it is meant to regulate over the public that it is meant to protect. Another issue is that the CNSC reports to the same minister that is responsible for promoting the nuclear industry.</p> <p>[Français] La CCSN travaille main dans la main avec l'industrie nucléaire et a même repoussé la date limite du PFP d'un scientifique soutenant l'industrie sans la faire connaître au grand public.</p> <p>L'EIE ne traite pas des conflits d'intérêts potentiels entre le promoteur et les institutions responsables de l'application de la surveillance et du suivi de l'IGDPS. De plus, depuis que les activités du site de Chalk River ont été transférées d'EACL aux LNC sous le dernier gouvernement, il est devenu évident que les aspects économiques du projet ont guidé son élaboration et sa conception. Les accidents et les défaillances devraient être au centre des préoccupations, mais ils semblent plutôt ne pas en faire partie. Toute décision finale devrait appartenir à des représentants élus et non à des intérêts privés. La CCSN devrait avoir une prise de décision limitée pour les projets nucléaires et impliquer plutôt la ministre de l'Environnement.</p> <p>Quelles raisons expliquent que la CCSN, composée de membres non élus, soit la seule autorité apte à approuver les projets concernant le nucléaire, éliminant de facto toute intervention du Ministre de l'Environnement? Ce projet semble avoir déjà été décidé et, puis annoncé.</p> <p>Le vice-président des projets de déclasserement des LNC a déclaré que le promoteur est conscient du fait que la CCSN ne refuse jamais une demande de permis; qu'elle approuve simplement les projets des promoteurs tels qu'ils ont été proposés ou conçus. Ce projet devrait être l'occasion pour la CCSN de se tenir debout et de demander une solution mieux conçue pour traiter les déchets.</p> <p>Ce projet devrait être reporté jusqu'à l'adoption de la nouvelle loi sur l'évaluation environnementale, car il a été recommandé de retirer à la CCSN le pouvoir décisionnel exclusif sur les projets nucléaires et de le confier à une autorité indépendante d'évaluation des impacts. La CCSN a également démontré qu'elle souffre d'une « capture réglementaire », dans laquelle un organisme de réglementation favorise l'industrie qu'elle est censée</p>	

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		réglementer plutôt que le public qu'elle est censée protéger. En outre, la CCSN relève du même ministre responsable de la promotion de l'industrie nucléaire.	
45.	Judith Lacroix (August 16, 2017)	There is a long history of denial and obstruction at the Chalk River site. Denial of tritium contamination or underreporting the migration of sub grade Cesium and Strontium 90 plumes. Is the CNSC aware of vials of Plutonium that were found before restructuring by a military contingent reclaiming World War 2 era mustard gas and other materials. Legacy waste and contamination issues will pose a large hurdle for the buildings on site to be demolished. CNL will attempt to store as much intermediate waste as they can in the NSDF and the CNSC does not stand over the corporations shoulder to make sure they don't exceed the 1% limit. Do they?	
CNSC Regulatory Framework			
46.	Jeff and Mary Margaret Johnson (May 10, 2017) OFWCA (Johanna Echlin) (May 8, 2017) Karen Keon (May 7, 2017) Jeff and Mary Margaret Johnson (May 10, 2017) Laurie Wagner (August 15, 2016) OFWCA (August 15, 2017)	<p><i>Concerns on this topic were expressed by more than one commenter, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p> <p>The ECM is projected to contain one million cubic metres of radioactive waste by the year 2070. This will be the first disposal facility for radioactive waste in Canada, which has never licensed such a facility. The CNSC has never established regulations for a permanent disposal facility.</p> <p>Currently there are no laws in Canada regulating the disposal of radioactive waste. CNL's project would be the first disposal site in Canada for radioactive waste. And the current Environmental Assessments laws are incredibly lacking. How can Canada and the CNSC even consider moving forward with this proposal (and the one at Rolphton) under these pitiful circumstances?</p> <p>This proposal (and the one for Rolphton) should be placed on hold until Canada has established the best regulations that conform to International Atomic Energy Agency standards for the disposal of radioactive waste and until Canada has adopted a new stringent environmental assessment law.</p>	
47.	Evelyn Gigantes	<i>Concerns on this topic were expressed by more than one commenter, and comments have either been</i>	

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	(May 17, 2017) Catherine Galligan (August 14, 2017) Mike Schreiner (August 16, 2017) PCWO (August 16, 2017)	<p><i>summarized, or included as excerpts from commenter submissions.</i></p> <p>The Canadian Nuclear Safety Commission (CNSC) has a legal obligation to ensure that the current process reflects the <i>Canadian Environmental Assessment Act</i>, (2012). In the commenter's view, that is not happening here.</p>	
48.	The Canadian Association of Physicians for the Environment (April 18, 2017)	<p>The non-elected Canadian Nuclear Safety Commission is solely responsible for approving projects. The Commission has demonstrated an inability to protect the environment and a tendency to favor the interests of the nuclear industry in relation to public safety.</p>	
49.	Janey Bullivant (May 13, 2017) Brian Ahearn (May 15, 2017)	<p><i>Concerns on this topic were expressed by more than one commenter, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p> <p>What is the decision making process for the NSDF? It gets cursory mention in CNL's most recently published Long Term Strategy (April 18 2017) and I can find no evidence of pro-active community engagement. It is though they are trying to sneak this through without the world noticing, which seems absolutely extraordinary for a country with such a reputation for integrity and so much to lose in terms of its reputation for its outstanding natural beauty.</p>	
50.	Simon Bullivant (May 13, 2017)	<p>In light of the incredibly long term consequences of this proposal, decision should be based on:</p> <ol style="list-style-type: none"> 1. Due process and accountability: A full explanation of who made what decisions, representing what interests, should be set out and made public. Were all those who will potentially be affected in actual fact represented? This decision potentially affects a huge number of people for a very long time, and if they are not represented in some way, and able to validate for themselves that due process was followed, the decision carries no legitimacy. It cannot be a legitimate decision unless the interests of those affected by 	

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		<p>the site are represented, and the chain of accountability is clear and made public.</p> <p>2. Full knowledge: Evidence should be made available that a proper and independent study was (or is being) carried out as to what all the potential risks of the proposal are, and how those have been eradicated. The same should apply to all the criteria, but health and safety risks are clearly paramount.</p> <p>3. Transparency on the basis of decision: The criteria for the decision to site the dump at Chalk River should be published (e.g. safety, the environment, economic benefits to the area, etc.) with a full explanation of the reasons why each criteria was selected, their relative weightings, and how the site choice fulfils those criteria.</p>	
51.	Paulette Demmons (May 9, 2017)	Will the Canadian Nuclear Safety Commission decision expected in January 2018 put public and environment concerns first? Those of us who spend time along the Ottawa River have to hope that they will.	
52.	Ralliement contre la pollution radioactive (August 3, 2017)	<p><i>Please note that this comment was submitted in French, and therefore a response in French will be provided.</i></p> <p><i>Veillez noter que ce commentaire a été soumis en français, et une réponse sera donc fournie en français.</i></p> <p>La CCSN doit démontrer son indépendance à l'égard des coûts et de l'urgence, dont l'étude d'impact ne démontre ni la nécessité, ni l'utilité pour réduire l'impact écologique des déchets radioactifs « historiques ».</p> <p>La CCSN doit demander que le promoteur démontre que l'impact environnemental négatif des déchets de moyenne activité sera bien moindre s'il en cache immédiatement une « petite portion » non quantifiée dans ce dépotoir plutôt que de les éliminer tous en même temps dans le site d'enfouissement géologique qu'il prévoit encore aménager à une date ultérieure.</p>	
53.	CCNR (August 16, 2017)	The NSDF project is presented not as a temporary, interim storage facility but as a permanent repository that will ultimately be abandoned. We are dealing with a potentially infinite time horizon. The proponent seeks approval not just for a few decades, but forever. Such permission has never before been granted for post-fission radioactive wastes in Canada, nor should it be granted. Long-lived radioactive waste should not be abandoned, especially not on the surface beside a major body of water. That is the considered opinion of the	

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		<p>CCNR.</p> <p>The CNSC describes itself as an agency that is “science-based”. As such, CNSC must be aware that there are no principals of science that can be invoked to guarantee that a gigantic mound of radioactive waste and radioactively contaminated materials, located on the surface in a marshy area close to Perch Lake, less than a kilometre from the Ottawa River, in a seismically active region, can be counted on to remain intact forever. There is no scientific justification for accepting this misleadingly named NSDF as a permanent repository for long-lived radioactive waste.</p>	
54.	<p>J. P. Unger (August 15, 2017)</p>	<p>The CNSC appears to be rushing to approve this project and provide a fortune from our taxpayer-provided money to a business group just before new EIA rules take effect, and before tenures of CNSC heads expire, which makes it highly suspicious on many levels.</p> <p>The CNSC's apparent hurry to green-light this dangerous project assigning a fortune in taxpayer money to a group that includes a private business widely reported to be facing multiple criminal charges and globally blacklisted for corrupt practices by the World Bank makes it highly suspicious, and should be in itself enough reason to halt this project.</p> <p>I ask of you that this radioactive landfill project be stopped, and also take this opportunity to ask that a thorough investigation of the dealings of the CNSC with SNC Lavalin and its partners and a deep reform of the CNSC and its authorities be undertaken at the earliest opportunity.</p> <p>Canada is severely lacking in adequate and independent environmental review for its nuclear industry. There doesn't seem to be a coherent, centralized plan that goes beyond privatization and industry self-regulation. Canada continues to sell nuclear technology and reactors around the world. It needs to be a leader in radioactive waste disposal if it wants to maintain any credibility. CNLs low budget plan is an embarrassment to international standards. It must be stopped until there is an adequate review process in place.</p>	
55.	<p>Greenpeace (August 16, 2017)</p>	<p>The second aspect of our concern is the lack of a federal policy framework for determining both the technical and social acceptability of proposals to store, manage or dispose non-fuel radioactive waste in Canada. The federal government's 1996 Radioactive Waste Policy Framework does not explicitly address issues such as</p>	

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		<p>social acceptability or ethical considerations. Greenpeace has opposed Ontario Power Generation's (OPG) proposal to build a Deep Geological Repository (DGR) due to this lack of a clear federal policy framework.</p> <p>The CNSC's environmental assessment process is no a substitute for such a policy framework. CNSC staff admitted during environmental assessment hearings on OPG's DGR proposal that the Commission lacks the institutional knowledge and capacity needed to assess whether a project contributes or undermines Canada's shift to sustainable development. Sustainability assessments assess the ethics of project (impacts on future generations) and alternatives to a project. This has not happened in the assessment of the NSDF.</p>	
56.	<p>Ralliement contre la pollution radioactive (August 3, 2017)</p>	<p><i>Please note that this comment was submitted in French, and therefore a response in French will be provided.</i></p> <p><i>Veillez noter que ce commentaire a été soumis en français, et une réponse sera donc fournie en français.</i></p> <p>Le problème, c'est que le dépotoir proposé constitue un projet très particulier; malheureusement, la CCSN a omis d'adapter en conséquence ses lignes directrices génériques pour la confection de l'ÉIE d'un projet aussi spécifique.</p> <p>La <i>Loi canadienne sur les évaluations environnementales</i> et les règles génériques de la CCSN sont conçus pour des projets industriels rentables (une mine d'uranium ou une centrale nucléaire par exemple) qui veulent s'établir dans un environnement pollué et qui doivent s'efforcer de ne pas le dégrader davantage. On leur demande donc de bien mesurer l'état initial des lieux et de réduire autant que possible l'impact négatif de leurs activités sur le voisinage. Quand ils ont fini d'exploiter leur industrie, ils doivent aussi remettre l'environnement dans son état initial.</p> <p>Dans le cas présent, nous sommes déjà à la fin du processus: Les laboratoires du Gouvernement du Canada se sont établis sur le site de Chalk River en 1944, alors que l'endroit était sauvage et à peu près vierge. Le même gouvernement y a mené depuis lors des activités industrielles intensives qui ont considérablement dégradé les lieux, au point qu'il peut difficilement poursuivre ses activités sans d'abord nettoyer les millions de tonnes de déchets dangereux ou radioactifs qu'il y a créés ou accumulés. Nous sommes donc à l'étape où il faut remettre le milieu dans son état originel de 1944, mais l'étude d'impact ne tient aucun compte de cet objectif.</p>	

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		<p>Le projet de dépotoir n'est pas un projet rentable d'exploitation des ressources naturelles, mais plutôt un effort de dépollution et d'isolation des radiations pour diminuer l'impact environnemental du passé. Certes, il faut réduire les nuisances liées à la construction du dépotoir, mais surtout démontrer qu'il va atteindre son objectif principal : réduire l'impact environnemental des déchets radioactifs qui résulte des négligences historiques des militaires et des scientifiques gouvernementaux. C'est quelque chose que la Commission de sûreté nucléaire n'a même pas demandé au promoteur. Cela ne figure pas aux « lignes directrices génériques ».</p> <p>En omettant d'adapter ses lignes directrices, la CCSN a permis au promoteur gouvernemental de simplement plaider que son nouveau projet n'aggraverait pas trop la pollution ambiante et qu'il ne créera pas de nouveaux dangers environnementaux inacceptables. Elle lui a permis de ne pas avoir à démontrer que le nouveau dépotoir de déchets radioactifs est la meilleure solution pour disposer définitivement des déchets qui l'encombrent et dont il veut faire oublier les effets à tout prix.</p> <p>Le Ralliement contre la pollution radioactive demande que la CCSN adapte sérieusement ses lignes directrices en fonction des conditions particulières de la présente situation afin d'en resserrer les exigences et de mieux expliciter le fardeau de preuve du promoteur.</p>	
57.	Valerie Needham (August 15, 2017)	<p>I implore the Canadian Nuclear Safety Commission to:</p> <ol style="list-style-type: none"> 1. act wisely and responsibly for the protection of millions of Canadians and cancel this project as it is currently conceived 2. require CNL to take steps to PREVENT a disaster rather than merely informing municipalities and the populace when a disaster has occurred 3. honour the motions passed by the OFWCA on July 22, 2017 	
Roles and Responsibilities			
58.	Denise Anne Walker (May 8, 2017)	<p><i>Concerns on this topic were expressed by more than one commenter and comments have either been summarized, or included as excerpts from commenter submissions. Given that there were comments on this topic submitted in both English and French, the comment summary below is provided in both official</i></p>	

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	<p>Mario Gervais (August 16, 2017)</p>	<p><i>languages, and a response in both official languages will also be provided.</i></p> <p><i>Des préoccupations à ce sujet ont été exprimées par plus qu'un intervenant et les commentaires ont été résumés ou inclus sous forme d'extraits de commentaires. Étant donné que les commentaires sur ce sujet ont été soumis en anglais et en français, le synthèse des commentaires ci-dessous est fourni dans les deux langues officielles et une réponse dans les deux langues officielles sera également fournie.</i></p> <p>[English]</p> <p>CNL describes AECL as the long-term steward of the site. CNL's activities are funded and approved by AECL. Why is AECL not the proponent?</p> <p>[Français]</p> <p>Les LNC décrivent l'EACL comme le responsable à long terme du site. Les activités des LNC sont financées et approuvées par l'EACL. Pourquoi l'EACL n'est-elle pas le promoteur?</p>	
59.	<p>Denise Anne Walker (May 8, 2017)</p>	<p>AECL is a Canadian crown corporation, and AECL funds and approves CNL's work on the ECM. Has the CNSC been given any directive, guidance, or other direction by Natural Resources Canada concerning this project?</p>	
60.	<p>Great Lakes and St. Lawrence Cities Initiative (August 15, 2017)</p> <p>Patrick Galligan (August 15, 2017)</p> <p>Irene Boland and Mark Barnes (August 15, 2017)</p>	<p><i>Concerns on this topic were expressed by more than one commenter, and comments have either been summarized, or included as excerpts from commenter submissions.</i></p> <p>Should the company come in severe financial difficulties, the taxpayer must not have to take responsibility and support the financial burden of this facility.</p> <p>The EIS needs to evaluate the complete operations and maintenance cost of the facility. We ask that, following this evaluation and considering the risk that the proponent may not be capable of maintaining its financial capacity over the long-term, the CNSC require the creation of a long-term operations & maintenance contingency fund. Different scenarios to finance and ensure a sound and transparent management of the fund</p>	

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	<p>Catherine Galligan (August 14, 2017)</p> <p>Owen Gleason (August 16, 2017)</p>	<p>should be identified so that the regulation agency, and possibly the responsible federal department, can contemplate possible avenues to secure its sustainability over time. The contingency fund maintained by companies operating in the oil transportation sector on the St. Lawrence may serve as a model for such a contingency fund.</p>	
61.	<p>CCNR (August 16, 2017)</p>	<p>The EIS provides no explanation whatsoever about what radioactivity is or how it can cause biological harm. In response to questions from the Algonquins of Pikwakanagan CCNR prepared a document to try to explain some of these basic concepts [see http://ccnr.org/Pikwakanagan-3.pdf]. Unfortunately CNSC does not provide such information, nor does it require its licensees to provide such information, even though knowledge of this kind is of fundamental importance to understanding the importance of proper containment of radionuclides.</p>	