

Minister Jonathan Wilkinson
House of Commons,
Ottawa, Ontario, Canada K1A 0A6

July 9, 2021

To Minister Wilkinson,

We are writing to you to indicate Ottawa Riverkeeper's support for the City of Ottawa's request for a regional assessment of radioactive disposal projects in the Ottawa Valley through the *Impact Assessment Act*.

Ottawa Riverkeeper has been a long time stakeholder in the projects at the Chalk River Laboratories (CRL) due to our mandate of ensuring the health of the Ottawa River watershed. Ottawa Riverkeeper is a member of the Chalk River Nuclear Laboratories' Environmental Stewardship Council. We have hired experts to review the Environmental Impact Statement and submitted our major concerns at different times regarding the activities at the CRL site including: participating as an intervenor the first time the Near Surface Disposal Facility (NSDF) was proposed, submitting our concerns during the the licensing renewal hearing for the Chalk River site in 2017, and participating in the regulatory overview process in 2019.

We are also concerned with the issue of nuclear waste policy more broadly, and submitted a detailed list of recommendations to the recent review of Canada's Radioactive Waste Policy performed by NRCAN. These recommendations are based on our work over the years regarding the CRL site specifically, but also apply to how radioactive waste is regulated in this country and our ongoing concerns by the policy gaps which currently exist.

Ottawa Riverkeeper would like to indicate our support for a regional assessment of radioactive disposal projects in the Ottawa Valley for several reasons. First, in light of the ongoing review for the NSDF proposal, a regional assessment would contextualise this project in relation to other projects occurring at Chalk River Laboratories located along the shores of the Ottawa River. These include the development of the Cask Facility, the Small Modular Above Ground Storage (SMAGS), and the proposal to include a Micro Modular Reactor at CRL. A regional assessment process would also provide a stronger understanding of how future projects are to be managed at this site and how Canada's current lack of regulations regarding non-fuel waste level will impact it.

Given the combination of a lack of adequate regulations to manage non-fuel nuclear waste in Canada, and the spate of rapid new developments and changes at the CRL site, we believe a regional assessment would provide a much needed comprehensive picture of the potential threats to our watershed that could emerge from these projects. We strongly urge you to implement such an assessment, as requested by the City of Ottawa.

Regards,

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Larissa Holman
Director of Science and Policy

Dave Rayner
Interim Executive Director