

I respectfully submit my comments, concerns and questions, in reference to the Impact Assessment review process which began on January 5 and the NWMO's "initial project description".

I am a citizen of Northwestern Ontario. I do not live in the Township of Ignace or Wabigoon Lake Ojibway Nation but nonetheless, I and my family as well as all others in the surrounding land and waterways stand to be adversely impacted if this project as submitted was to proceed to fruition.

In the "initial project description" NWMO states:

- Canada's **nuclear power plants provide clean energy.**
- The reason this project is needed is because **nuclear fuel remains radioactive for a very long time** and therefore **requires careful, permanent management to avoid placing a burden on future generations.**
- This project, the installation of a **Deep Geological Repository (DGR)** located in the Revel Lake area, **will provide a safe, permanent and responsible solution that will ensure the used fuel is securely contained and isolated** from people and the environment for generations to come.
- The **DGR will eliminate the need for future generations to actively manage used nuclear fuel** and will reduce long-term environmental risks.
- The above bullet points are just a few of the statements in the initial project description that spark concern, however given the short window to comment, it is not possible to make specific reference to each statement that is of concern.

1. **The 30-day comment period is too short. Reserve right to make additional comments.** Many people concerned about this project including the transportation of the radio-active waste to the site, will not have heard about the comment period and for those of us who were alerted to the comment period it is a very short period of time to comment on the initial project description. This is a very important project that will have impacts far into the future. The review process must be thorough and allow public participation. A 30-day comment period works against all of that. I reserve the right to make additional comments given the 30-day comment period was insufficient for a full review.
2. **Project description was poorly done and leaves out important information.** The NWMO provides too little information about project activities, including those project activities that pose radiological risk for the workers and for residents in the area and downstream from the project site. There is not enough information about the Used Fuel Packaging Plant, how the wastes will be transferred into the underground and placed in the emplacement rooms, how the containers will be monitored after they are underground, and how they will be retrieved or repaired in the event of a container failing.
3. **Nuclear energy is not clean energy.** NWMO states nuclear energy is a clean energy. Nuclear energy is NOT a clean energy. In the process of creating nuclear energy, radioactive waste in the form of spent fuel is produced therefore nuclear energy can by no means be considered a clean energy. In addition, the waste remains radioactive for thousands of years expediently increasing the risk of harm to life and environment of exposer over this period of time.

4. **Burying radioactive nuclear fuel deep in the ground using a method that has yet to be put into practice anywhere in the world is not a safe, permanent, responsible, or a securely contained solution.** The only generation this solution removes the burden from is in this generation, more specifically Canada's nuclear power plants that currently produce the radioactive material, and places the burden directly on future generations, and the citizens and environment in the area the DGR is located, as well as the citizens and environment along the transportation path, 1800 km in distance from place of origin to burial site.
5. **This project proposes the plan will remove the burden from future generations and reduce long term environmental risks, yet it does not intend to permanently manage the waste.** How does not actively managing the buried radioactive waste remove the burden from future generations and thereby reduce long-term environmental risks? If anything, it would increase the burden and risk for future generations and the environment.
6. **The proposed DGR solution is not a proven method for safely storing radioactive nuclear waste.** Although NMWOs DGR is a decision of permanent consequences, it has not provided actual proof a DGR will provide safe, permanent, and responsible management of radioactive waste that is safe or sustainable.

NWMO has NOT demonstrated there is actual proof a DGR is a best practice.

NWMO states "a DGR is an internationally recognized best practice for the long-term management of used nuclear fuel". A DGR cannot be considered a best practice, or suitable solution, when it is only a concept that has not yet been put into practice nor has it been proven to have stood the test of time. Best practice is defined as a validated procedure, a method proven to work. **Given the catastrophic long-lasting fall-out if this DGR was to fail, more than unsubstantiated claims of it being a best practice is required before moving forward with a DGR.**

The research, site characterization, and modelling done by NWMO does not prove suitability to safely contain and isolate waste. To theorize or hypothesize through site characterization and modeling is not proof.

7. **The NWMO have made false statements (assurances) of the safety of what they are proposing.** NWMO purports that the **handling, transporting and burying** the spent fuel is safe. That is not a fact and yet they present it as such.
8. **NWMO has NOT been transparent with the general population, most specifically to the citizens of Northwestern Ontario (NWO).** The manner in which the NWMO went about selecting 'host' communities was not done in a manner that lent itself to informing the citizens of NWO as a whole as to what was being proposed, rather the 'extensive public engagement' was targeted to selective communities where NWMO sought approval through directing considerable funds to the community, with the promise of more to come.

9. **The decision on where the DGR is to be located was not made by the citizens who stand to be adversely impacted by it the most**, that being the citizens of Ontario along the transportation route (from the nuclear plants or current storage locations to the proposed site), the citizens of Northwestern Ontario (NWO), and others downstream from the headwaters of the Wabigoon Watershed.

10. **I did not give my voice to the Township of Ignace nor to the Wabigoon Lake Ojibway Nation to speak on my behalf regarding a decision that puts myself, my family, the environment, and future generations at risk by transporting and burying radioactive waste in Northwestern Ontario.** During the "14 year site selection process" that NWMO has undertaken to 'select' the host community", the general population was not aware of what was being proposed and that the 'host' community(ies) would be making a decision for a DGR that, for one, was not located within the host township itself, and two, a decision that would pose a serious risk of having a long lasting catastrophic impact on not just the host township, but on a majority of the people in NWO, and the environment of NWO. How is it possible these two communities can decide to bury radioactive waste in someone else's back yard? How can a select few people in a small community decide on an impactful and long lasting initiative such as what is being proposed? I did not give my voice to the Township of Ignace nor to the Wabigoon Lake Ojibway Nation to speak on my behalf and yet I along with many other citizens of Northwestern Ontario and others along the transportation route, or downstream from the Wabigoon Watershed (as far reaching as Manitoba?) will be put at risk by this decision.

11. **The transportation of the nuclear waste from its current locations to the proposed site in NWO is an integral part of this project and to exclude it from the Impact Assessment process is misleading as to the risks involved in this proposed solution.** To say that transportation of used fuel from the reactor and storage sites to the Project site is not required to be included in the process, is like saying nuclear fuel is a clean source of energy if you just ignore the highly contaminated waste it produces. The transportation of nuclear waste is an obvious key factor which brings into question the risk of the environment and people across thousands of highway miles.

12. **Long-distance transportation must be included in the project review.** NWMO is trying to persuade the Impact Assessment Agency that transportation can be left out of the review after describing transportation as part of their project for more than twenty years.

13. **Project focus and funding is misplaced.** I understand that a considerable portion of the NWMO budget has been spent on the communities it targeted to be a host community. First, buying someone's agreement to be a host community and thereby giving them the authority to make a decision that has a significant long-lasting impact on communities other than the host community is simply wrong and unethical. Second, I would argue that the funds could have been better spent on pursuing a solution that didn't involve greater risk to the environment and the citizens of Ontario, by developing better storage opportunities close to the sites in which the nuclear waste is being

produced, thereby eliminating the cost and risks involve for transportation, burial, and monitoring, or worse yet abandoning the waste, leaving future generations with an even bigger problem than what currently exists. **Long-distance transportation must be included in the project review.** NWMO is trying to persuade the Impact Assessment Agency that transportation can be left out of the review after describing transportation as part of their project for more than twenty years.

14. **NWMO and the host communities are in a Conflict-of-Interest.** The NWMO and the host communities are being paid considerable amounts of money (taxpayer funded) to bring the DGR to fruition rather than finding a solution with the best interest of the very peoples and environment this project is supposed to protect. In the relatively recent past companies dealt with unwanted harmful waste by putting it in barrels and paying employees or others to bury it, thinking the problem was solved. Did we not learn from the mistakes of the past? How well did that turn out for the people and the land where it was buried? Is the expectation of NWMO we forget about what the waste they want to bury and instead be thankful for money they are pouring into the host communities and the jobs they proport will be created to carry out the task of burying the waste now, and leave the problem of toxic waste for future generations to deal with when the full impact of burying toxic waste is realized.
15. **Request this project be the subject of a full impact assessment including a public hearing, and that the Impact Assessment Agency ensure that the public is able to participate in a meaningful way through each step of the process.** My comments and concerns in reference to the project itself and the NWMO's method of selecting the site and their site selection may not be in the scope of the 'initial project description' however it is their actions to date that have brought the project to this point. Actions that provide insight as to how they are managing and communicating this project, and based on how they have navigated their way to this point shows a carefully crafted means to and end. It is clear their actions lack transparency, lack inclusion of participation by those along the transport route and the people of Northwestern Ontario, use manipulative means to get the results they want, and in general lack integrity in how they are choosing to conduct business. Yet we are being asked to support them in a project from which we stand to bear the fall-out if what they propose fails to produce safe results. The initial project description continues in the same manner by not providing enough information on many aspects of the project, for example, by leaving out transportation, long-term safety, emergency response and evacuation plans, worker and occupation health, alternative means of carrying out the project, to name a few. Simply said I do not trust the unethical method in which they have managed this project to date and by all appearances will continue to manage it going forward.

Respectfully submitted,
Janice Winik