



The Society of High Prairie

Regional Environmental Action Committee

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Business Number: 135227387 RR0001

REAC Comments on:
**Impact Assessment Agency of
Canada's
Public Participation Plan
For Canada's first
Deep Geological Repository
for Canada's Used Nuclear
Fuel Project**

<https://iaac-aeic.gc.ca/050/documents/p88774/166006E.pdf>

Thank you for this opportunity to provide comment.

Section 1: Introduction

The Government of Canada is committed to providing the public with the opportunity and information needed to participate in an informed and meaningful way throughout the integrated assessment process.

Although our region in Northern Alberta is proposed to send nuclear waste to the proposed DGR, no one around here has heard of this project. People in Alberta have not been engaged with on this proposed facility, and in fact, the project proponent of the proposed Peace River Nuclear Power project has conflicting statements about the management of nuclear waste in their initial project description. After saying nuclear waste from that project would be shipped to Ontario, they state further in their initial project description:

in Section 4.6.6, on page 68, the proponent (Energy Alberta) states: Since Alberta does not currently operate any dedicated nuclear waste management (i.e., processing and storage) facilities and shipping wastes to Ontario where such facilities exist is considered to introduce undue risk and cost to the Project, this alternative was not chosen. (underlining is ours)

Of the people engaging with the nuclear file in Alberta, we know of no-one who is preparing to submit comment on the Public Participation Plan, as we do here. This observation is to note that zero engagement has taken place, and the issue is far from peoples' minds.

Section 2: Description of the proposed project

The project is expected to span approximately 160 years, encompassing site preparation, construction, operation and closure monitoring.

*The **Draft Integrated Tailored Impact Statement Guidelines** for the DGR project state that the project will span an estimated one million years. In our comments on that document, we congratulated the IAAC about how appropriate that timeline was. Now in the public participation plan, we see this timeline of 160 years. While more manageable in terms of human imagination and planning capabilities, the 160 years timeline is not realistic for the management of nuclear waste. This fact should be reflected in any public participation information, including your powerpoint presentation.*

Section 3: Objectives of public participation

- participation is meaningful...
- The public is engaged early and often ...
- The selection of participation opportunities and mechanisms at each key phase in the process is based on the needs, interests, and values of the public ...
- Public views heard throughout the process are tracked, meaningfully considered, and inform decision making...

We are extremely disappointed to observe that the Impact Assessment Agency of Canada, the Canadian Nuclear Safety Commission, and the project proponent have completely failed in these stated objectives when it comes to the public in Alberta, and likely Saskatchewan and Manitoba, through which our proposed future nuclear waste would transit. Other provinces that are proposed to be included through contributing nuclear waste to the DGR project are Quebec and New Brunswick, and possibly the Yukon.

With the proposed ‘ramping up’ of nuclear energy around Canada, including the suggestion of many potential future SM(N)Rs in remote regions, we hope that the Impact Agency of Canada and the Canadian Nuclear Safety Commission are not attempting to minimize the importance of transport of nuclear waste to this proposed centralized DGR. Nuclear power has unique and very long-lived issues with radioactive waste that have not been solved anywhere in the world. A famous DGR in Germany is now ‘resurfacing’ their nuclear waste because of the potential for radioactive pollution to reach groundwater¹. Canadians all over our country are concerned, and we deserve to be identified as ‘the public’ for the purposes of meaningfully engaging in a selection of opportunities for comment. The issues attached

¹ https://en.wikipedia.org/wiki/Asse_II_mine

to long term transport and the storage on nuclear waste affect all of us for many many generations into the future (one million years). The public of Canada affected by nuclear power generation, transport of nuclear waste and the long term storage of nuclear waste includes more than the public in Ontario.

Section 4: Identification of participants

IAAC and the CNSC invite all individuals, groups and organizations with an interest in the integrated assessment of the project to participate in the process and related engagement activities.

Where and when did you issue this invite? The only reason we are aware of the impact assessment process currently underway with Canada's first deep geological repository for the long term storage of nuclear waste is because we participate in a national group that discusses such projects. As noted in the previous section, large areas of Canada where nuclear waste is produced, or proposed to be produced, and/or through which nuclear waste is proposed to be transported have not yet been included in outreach by the IAAC and the CNSC.

Section 5: Public participation tools

- Public notice(s) and key documents in plain language published on the registry, in public viewing centres (see Appendix), newspapers, news websites, television and radio broadcasts, and mailouts;

We have zero public viewing centres in Alberta, there has been little coverage of the project in newspapers, and therefor on local news websites. We have seen not advertisements for public participation in the DGR process in local newspapers, television, radio broadcasts, or in fact anywhere. Certainly we have not received any mailouts.

- Where appropriate, meetings, focus groups, presentations, and workshops;

*As project manager for our group, with direct interest in the proposed Peace River Nuclear Power project, I requested the powerpoint from a recent IAAC on-line presentation about the DGR and received it. This document, while providing some important information in a user-friendly format, I found to be somewhat superficial for anyone seeking detailed information. For example, the powerpoint provided by the IAAC on this project states the project timeline is 160 years, however in the detailed **Draft Integrated Tailored Impact Statement Guidelines**, the more reasonable 1 million years estimate is utilized. On the other hand,*

*reading through the details of the project proponent's Initial Project Description, or even the **Draft Integrated Tailored Impact Statement Guidelines** for this project is an onerous task, unlikely to be undertaken by many people.*

6. Activities and public participation approach

We note that according to the table provided, we are still in Phase 1 of the public participation plan for Canada's first deep geological repository for nuclear waste. For All Future Phases of public participation for this project, please carefully consider greatly expanding the reach of public engagement in the public participation plan to include locations beyond Ontario, as most of Canada may be affected by the transport of nuclear waste to this proposed DGR. At a minimum, please include outreach to the public in Alberta, Saskatchewan, Manitoba, Quebec, and New Brunswick.

Those of our members who are most concerned about the potential negative effects of nuclear power generation, the transportation of radioactive nuclear waste, and the long-term storage of this highly dangerous waste, are quite distressed when attempting to read the intricate details (project descriptions, etc.) of how these projects are proposed to be accomplished. The burden falls to me, our project coordinator, and I am doing my best. I must note the depression and anxiety about this in a large group, perhaps even a majority, of the general public in our region, which has already overcome one nuclear proposal² only to face another, fifteen years later. It feels to us as though the proponents of nuclear power are human parasites feeding on the public purse while side stepping our health concerns about radioactive pollution with 'thresholds'³.

This current IAAC and CNSC process seems to be minimizing the incredibly long-lasting effects of managing nuclear waste by vastly understated timelines for the general public (one million years in the detailed impact statement guidelines, with 160 years stated in the 'public facing' materials). Our health concerns are born out in recent studies showing increased cancer mortality for those living in the vicinity of nuclear reactors⁴.

I have been subjected to patronizing and mean-spirited social media comments from nuclear cheerleaders whom our local governments have brought in to present for 'public education' meetings. Even nuclear scientists who raise the alarm have been vilified,

² <https://www.cbc.ca/news/canada/edmonton/bruce-power-dropping-alberta-nuclear-plant-proposal-1.1046668>

³ <https://we.riseup.net/assets/857041/Pollution+Is+Colonialism+%28Max+Liboiron%29.pdf>

⁴ <https://www.nature.com/articles/s41467-026-69285-4>, <https://hsph.harvard.edu/news/proximity-to-nuclear-power-plants-associated-with-increased-cancer-mortality/>

persecuted, and worse,⁵ not only be others in the science community, but by governments working to implement nuclear power. In developing future public participation in the impact assessment process for nuclear facilities, including the current DGR, it is vital that respect for all perspectives be maintained. We don't yet know what we don't know, and only careful listening can guide us to find those potential threats to us and to our future generations.

⁵ <http://segcarleton.ca/book-review-the-scientists-who-alerted-us-to-the-dangers-of-radiation/>