

Mr. Yukiya Amano, Director General  
International Atomic Energy Agency (IAEA)  
Vienna International Centre  
PO Box 100, 1400 Vienna, Austria

Dear Mr. Amano

We are writing to express our deep concern about Canada's failure to meet its commitments under the *Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management*. Canada is failing to manage its radioactive wastes in a responsible manner that would protect its citizens and avoid placing excessive burdens on future generations. We would like to bring to your attention the following:

- Canada has not developed policies and strategies for radioactive waste management as recommended by the IAEA (1). A recent petition to the Auditor General of Canada notes that Canada is grossly deficient in policies and strategies to guide the disposal of the federal government's 600,000 cubic meters of non-fuel, non-tailings radioactive waste, much of it a byproduct of plutonium production during the Cold War. (2)
- Canada has not developed a national classification system applicable to radioactive waste disposal despite having been asked about this several times during the IAEA peer review process (2). Canada's classification system allows long-lived radionuclides such as plutonium to be classified as "low level" and makes no mention of keeping these substances contained and isolated from the biosphere.

The Canadian Nuclear Safety Commission (CNSC) is currently conducting environmental assessments of three project proposals for permanent disposal of the federal government's own radioactive wastes that are completely out of alignment with IAEA guidance.

A giant, above-ground landfill for one million cubic meters of "low level" radioactive waste, including significant quantities of long-lived alpha and beta/gamma emitters, is proposed to be built beside the Ottawa River at Chalk River, Ontario. IAEA guidance states that near-surface disposal is not suitable for waste with long-lived radionuclides, because a "disposal facility at or near the surface makes it susceptible to processes and events that will degrade its containment and isolation capacity over much shorter periods of time" (3).

Nuclear reactor "entombment" projects are proposed for the Whiteshell-1 reactor beside the Winnipeg River in Pinawa Manitoba; and for the Nuclear Power Demonstration reactor beside the Ottawa River at Rolphton, Ontario. The IAEA does not recommend reactor entombment except in emergencies (4).

The federal government, which has responsibility for radioactive waste policy, has only ever released a "framework" composed of three bullets. (5) This "framework", developed with no public discussion or consultation, is now more than 20 years old. It states that waste owners must meet their responsibilities "in accordance with approved waste disposal plans," but the Government of Canada, as "owner" of the vast majority of Canada's non-fuel radioactive wastes, has never released an approved plan for long-term management of its own wastes.

If Canada had radioactive waste policies and plans, the three current proposals would not be undergoing environmental assessments. Canada is proposing to abandon long-lived radionuclides at or near the surface, at sites chosen for convenience rather than for long-term safety. Canada has never conducted a proper siting process for non-fuel radioactive wastes, either for a near-surface disposal facility or for a geological facility.

CNSC – far from intervening to address these problems – is compounding them. It dismissed warnings from scientific experts about serious flaws in the three proposals during the project description phase, and provided incomplete and misleading information about them in its recent report to the Joint Convention. CNSC is widely perceived to be subject to "regulatory capture." As a regulatory body, not a policy-making body, its so-called "regulatory policy" guides are no substitute for government policy. Canada lacks checks and balances and involvement of multiple agencies and departments in its nuclear governance system.

We believe that an IAEA investigation and report on Canada's radioactive waste management policies and practices is urgently needed. We also would like to request that IAEA review Canada's nuclear governance with a view to providing recommendations that would address serious current deficiencies.

We look forward very much to receiving your assistance in these very important matters.

Yours sincerely,

## References

- (1) IAEA 2009c. Policies and Strategies for Radioactive Waste Management. International Atomic Energy Agency. Nuclear Energy Series Guide No. NW-G-1.1. [https://wwwpub.iaea.org/MTCD/Publications/PDF/Pub1093\\_scr.pdf](https://wwwpub.iaea.org/MTCD/Publications/PDF/Pub1093_scr.pdf).
- (2) "Policies and strategies for managing non-fuel radioactive waste", petition number 411 to the Auditor General of Canada, September 21, 2017, summary and response at [http://www.oag-bvg.gc.ca/internet/English/pet\\_411\\_e\\_42850.html](http://www.oag-bvg.gc.ca/internet/English/pet_411_e_42850.html), full text of petition at <https://tinyurl.com/AG-petition-411>
- (3) IAEA 2014. [\*Near Surface Disposal Facilities for Radioactive Waste\*](#). Specific Safety

Guide No. SSG-29. International Atomic Energy Agency, Vienna.

(4) IAEA 2014. [Decommissioning of Facilities](#). General Safety Requirements Part

6. International Atomic Energy Agency, Vienna.

(5) Natural Resources Canada 1996. Radioactive Waste Policy

Framework. <https://www.nrcan.gc.ca/energy/uranium-nuclear/7725>