

Decommissioning Question 1: What do you feel are important policy considerations that should influence the choice of decommissioning strategies by nuclear operators and should be considered as part of Canada's radioactive waste policy?

1. The public needs to be involved for any new policy considerations during the decommissioning phase for the safety of all Canadians and our environment.
2. Decommissioning strategies must be a transparency process and needs to be conveyed without any fear of reprisals from the private sector industries or government as a participant in this process.
3. It is not sufficient alone to publish our public comments, it must be put to action as mitigation measures.

Decommissioning Question 2: In what ways should Canada's policy address the setting of end-state objectives for decommissioning?

1. We must consider the basic fundamentals of environmental sciences and stewardship. What is the real adaptation strategy for nuclear waste decommissioning? What does it mean to be a good nuclear waste steward? Answer: It is only a public and democratic government that can assume this stewardship with due-diligence, oversight, etc. and should never be in the hands of the private sector industry.
2. Can we really say that nuclear waste stewardship is possible in the private sector? I believe it cannot. Why? We currently have these nuclear wastes and need to act now and yet it took citizens across the country to make this point. The private sector is not rushing in any way to address citizens' concerns on nuclear waste decommissioning in the public domain.

- 3a. Decommissioning shall be inclusive of the following components and fundamentals:
 - 3a1. Transparency with the general public (in Canada and international).
 - 3a2. Nuclear waste risk assessments, surveillance and monitoring over time (permanently) must be permanent actions by the Government of Canada.
 - 3a3. Environmental impact and health and safety risk assessments need to be completed diligently for the decommissioning phase for long periods (thousands of years) by the government including maintaining permanent records of all decommissioning phases.

As a general comment, and as published on the Natural Resources Canada's website, the following reflection is made on the 3Rs (Reduce, Reuse, Recycle) -

Link: <https://nuclearsafety.gc.ca/eng/resources/fact-sheets/oversight-canada-framework-radioactive-waste-management.cfm>

The three Rs apply to the management of radioactive waste: reduce, reuse and recycle.

However, I ask myself this very question: **Is this manufactured ignorance? (willingly or unwillingly) but I do not know.**

There are actually 5Rs to consider and for all waste streams (e.g. Fundamentals of Environmental Stewardship) for waste in general and includes nuclear waste decommissioning and activities:

- A. **R1 - Reduce:** This step should be considered at stopping using nuclear fuel at its source (reduce meaning elimination at its source as a first step).
- B. **R2 - Reuse:** This concept of nuclear waste (reuse) is not viable economically, and would put considerable risks on the environment, citizens, aboriginal people, and workers).
- C. **R3 - Recycle:** It is not possible to recycle nuclear spent fuel as it will be here for thousands of years. Developing SMR technologies from nuclear waste is not viable economically or environmentally.
- D. **R4 - Repair:** Nuclear facilities maintenance are costly. For example, the accumulation of 5 billion dollars with the New Brunswick Power (Gov. of New Brunswick, Canada) was accumulated over the years to maintain its operation of its nuclear power plant, e.g. repair and maintenance. This is unacceptable to the taxpayer. New Brunswick is one of the poorest Province in Canada and this is an unacceptable burden to put on citizens in this province as well as Canadians anywhere, and globally, when decommissioning will be fostered and implemented as many nuclear power plant facilities will be impacted by decommissioning activities.
- E. **R5 - Refuse:** (e.g. Decommissioning – permanent repository, etc...) If we eliminate over time the need on nuclear energy and technologies, the end result is lower costs for Canadians and for decommissioning. It is not really comparable to a grave site or landfill, but can we really say a grave site (figuratively for nuclear waste)? Absolutely not and because it will stay ALIVE and its radioactive risks for thousands of years. The nuclear waste site risks will cause undue hardship on the environment, citizens, aboriginal people and internationally for generations.

My Final comments:

1. We need to look at a new model for waste minimization, and seriously look at waste elimination at the source.
2. This scope of waste elimination must be at the forefront of these discussions at the elimination phase at the extraction nuclear resource point in which it should have been done for decades now. Nuclear waste decommissioning needs hindsight, oversight, & transparency by a public body and not the private sector.

