

Elizabeth Dowdswell
President, Nuclear Waste Management Organization
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Toronto, ON
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October 21, 2005

Dear Ms. Dowdswell,

On behalf of Inuit Tapiriit Kanatami (ITK), I am pleased to submit the July – September, 2005 Quarterly Report regarding the National Inuit Specific Dialogues on the Long-Term Management of Nuclear Fuel Waste in Canada.

The status of the National Inuit-Specific Dialogues on the Long-Term Management of Nuclear Fuel Waste in Canada and the subsequent production of reports on this matter are outlined in the attached document.

Should you have any questions or comments regarding the materials in this package, please do not hesitate to contact me at any time.

Sincerely,

Soha Kneen, M.A.
Coordinator of the National Inuit Specific Dialogue on the
Long-Term Management of Nuclear Fuel Waste
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ITK Quarterly Report on the Inuit-Specific Dialogues on the Long-Term Management of Nuclear Fuel Waste in Canada (July – September 2005)



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INUIT TAPIIRIT KANATAMI

Submitted to:
Elizabeth Dowdswell
President
Nuclear Waste Management Organization (NWMO)

By:
Soha Kneen, M.A.
Senior Researcher/Operations Manager
Environment Department, Inuit Tapiriit Kanatami

October 2005

Ottawa, Canada

OUTLINE OF JULY - SEPTEMBER 2005 ACTIVITIES **4**

1. **FINALIZED REVIEW OF INUIT PERSPECTIVES ON THE NWMO DRAFT STUDY REPORT TITLED 'CHOOSING A WAY FORWARD – THE FUTURE MANAGEMENT OF CANADA'S USED NUCLEAR FUEL'** **4**
2. **FEEDBACK FROM THE RETURN OF RESULTS TOUR ON THE LONG-TERM MANAGEMENT OF NUCLEAR FUEL WASTE IN CANADA** **4**
3. **NEXT STEPS** **5**

APPENDIX A: **6**

Outline of July - September 2005 Activities

Throughout the past three months, ITK staff members, with the help of the National Task Force Members of the Inuit Land Claim Organizations, have been actively engaged in the coordination of the Return of Results Tour regarding the Inuit-Specific Dialogues on the Long-Term Management of Nuclear Fuel Waste in Canada.

The particulars of ITK's recent activities in the wrap-up of these dialogues will be addressed as follows:

1. Finalized Review of Inuit Perspectives on the NWMO Draft Study Report titled 'Choosing a Way Forward – The Future Management of Canada's Used Nuclear Fuel';
2. Feedback from the Return of Results Tour on the Long-Term Management of Nuclear Fuel Waste in Canada;
3. Next Steps.

1. Finalized Review of Inuit Perspectives on the NWMO Draft Study Report titled 'Choosing A Way Forward – The Future Management of Canada's Used Nuclear Fuel'

ITK staff members, in coordination with an external consultant have initiated and completed the review of the NWMO Draft Study Report titled 'Choosing A Way Forward – The Future Management of Canada's Used Nuclear Fuel' (hereafter referred to as Discussion Document #3). This review has been completed and was submitted to the NWMO in late July 2005. A copy of this review has been attached to this report (please see appendix A) for reference purposes. The reviews of Discussion Documents # 1, 2, and 3 have also been circulated within the four Inuit Land Claims Regions.

2. Feedback from the Return of Results Tour on the Long-Term Management of Nuclear Fuel Waste in Canada

The feedback that ITK staff members have to date collected from the NRCan funded Return of Results Meetings on the Inuit-Specific Dialogues on the Long-Term Management of Nuclear Fuel Waste in Canada has included the following information.

1. Information with regards to the possible health and environmental effects of nuclear fuel waste should be included in school curricula (from junior levels all the way through the highschool system);
2. Information distribution should generally be increased and should also include visual aids such as posters that could be placed on the walls of health centers for example;

3. Information distribution should also take place via the Land Claims Organizations, who in turn should be kept informed with regard to the issue of Nuclear Fuel Waste by both the Federal Government, as well as the Nuclear Waste Management Organization (NWMO);
4. It was expressed that the use of the terminology 'half life' with regards to the length of time that Nuclear Fuel Waste remains radioactive, is not appropriate. The length of time these materials remain dangerous to human and environmental health should be stated in actual terms and not in a manner that indicates the time in which these materials lose half of their radioactivity.

3. Next Steps

Until November 15, 2005, the activities of ITK staff members will include, but will not be limited to the following items.

- Continue the development, production and distribution of Inuit perspectives on the NWMO Draft Study Report;
- Finalize and submit the collected feedback from the Return of Results Tour on the Inuit-Specific Dialogues on the Long-Term Management of Nuclear Fuel Waste in Canada;
- Meet with Tony Hodge of the NWMO with regards to the updates to Discussion Document #3, which will be submitted to the Minister on November 15, 2005;
- Continue communications activities on the issue of the Long-Term Management of Nuclear Fuel Waste in Canada;ic Dialogues on the Long-Term Management of Nuclear Fuel Waste in Canada.

Appendix A:

Review of Inuit Perspectives on the NWMO Draft Study Report titled
'Choosing A Way Forward – The Future Management of Canada's
Used Nuclear Fuel'

ITK Review of the NWMO Discussion Document #3: Choosing a Way Forward



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INUIT TAPIIRIT KANATAMI

August 2005

Ottawa, Canada

Introduction

Inuit Tapiriit Kanatami (ITK) represents the Inuit of Canada on matters of national concern. There are approximately 50,000 Inuit living in 53 communities. The Inuit territory of Canada is divided into four main regions: The Nunavut region (further divided into the Kitikmeot, Kivalliq and Qikiqtaaluk regions), the Inuvialuit region (the western Arctic), Nunavik (northern Québec) and Nunatsiavut (Labrador).

ITK is the national voice of the Inuit of Canada and addresses issues of vital importance to the preservation of Inuit identity, culture and way of life. One of the most important responsibilities of ITK is to promote Inuit rights and to ensure that Inuit are properly informed about issues and events that affect their lives, and that processes purporting to address Inuit interests are properly informed by Inuit knowledge, perspectives and vision.

The ITK Department of Environment has the responsibility of protecting and advancing the place of Canadian Inuit in the use and management of the Arctic environment. It acts on this responsibility in close cooperation with Inuit regional organizations.

ITK's comments on the latest NWMO report, "Choosing a Way Forward" are intended to complement our *Final Report on the National Inuit-specific Dialogues on the Long-term Management of Nuclear Waste in Canada* submitted to the NWMO on June 30, 2005.

Further, ITK Resolution B05/06/09-09 adopted unanimously by the ITK Board of Directors on June 9, 2005, continues to state the Inuit's "complete opposition to the storage/disposal and transport of Nuclear Fuel Waste in areas adjacent to Inuit owned lands, on Inuit co-management managed lands and land governed by Inuit Land Claims Agreements". It is important in this regard to note that the Labrador Inuit Land Claims Agreement received Royal Assent on June 23, 2005. With the exception of the offshore area of Nunavik, this completes comprehensive land claims for the Inuit Canada. The Resolution goes on to select what was essentially Option 2 from the Discussion Documents - that is, storing waste at the existing sites "until a way is found to safely dispose of this waste without endangering the environment, human health and safety of all Canadians".

ITK's Response to "Choosing a Way Forward"

The NWMO is seeking input and opinion on a new option that emerged as thinking progressed through the evaluation of the original three options presented in earlier Discussion Documents. This new option is called Adaptive Phased Management and is based on a phased approach to eventual centralized containment of nuclear fuel waste and isolation deep underground.

From ITK's perspective, this option has value as its premise is that used fuel would continue to be stored at nuclear reactor sites until results from Phase I and Phase 2 research, analysis and consultation were obtained. This carries with it the assumption that there would be no Phase 2 - interim shallow underground storage, or a Phase 3 - long-term deep centralized storage unless this was proven technically feasible and socially acceptable. Generally, this conforms to the position adopted by our Board of Directors.

Having said that, the siting criteria established for this option is also of interest to ITK. Choosing a Way Forward states..."we believe that fairness would best be achieved if the site selection process is focused within the provinces that are directly involved in the nuclear fuel cycle - namely Ontario, New Brunswick, Québec and Saskatchewan". With the exception of Québec, this effectively excludes the Inuit regions.¹

The Report then further sets out another important criteria, that a willing host community is found. In this regard, it is clear that Inuit communities, including those in Nunavik (northern Québec) would not satisfy this criteria.

A further consideration, which serves to diminish interest in the Inuit regions, is the limit on transportation options. The operation of a centralized facility requires that fuel from existing reactor sites be transported and that an emergency response plan is developed. The lack of road or rail infrastructure in most Inuit regions and the degree of risk associated with sea or air transport combine to further discount the North as a suitable region. These same factors would make the development of satisfactory emergency response plans very unlikely.

ITK in no way wishes to appear to be advocating that the challenges be simply shifted to other regions and withdraw from the discussions. That would not be responsible. Rather, having read the report with care, we have noted that the NWMO process itself is coming to a conclusion that the North is not a suitable location for long-term storage. We also refer to the map on page 161 of the Report where the siting criteria associated with the Adaptive Phased Management Approach have been applied. Here too, with the exception of Nunavik, the Inuit regions have been totally excluded.

That being said, it is important to remind NWMO of one of the conclusions stated in the *Final Report on the National Inuit -Specific Dialogues on the Long-Term Management of Nuclear Waste in Canada*, namely:

"As Aboriginal Canadians, Inuit are also in opposition to the storage/disposal of Nuclear Fuel Waste anywhere else within Canada and insist that Nuclear Fuel Waste should remain on site of existing nuclear reactors....Inuit as Canadians do not advocate that Nuclear Fuel Waste should be stored on any new sites".

Questions and Observations Concerning the Adaptive Phased Management Approach²

ITK is making the assumption that unless the 30-year Phase I period comprehensively addresses all of the technical considerations implicit in moving to Phase 2 and is considered socially acceptable to Canadians at large, used fuel will continue to be stored at reactor sites.

What is not clear is in the case where there is no Phase 2 (interim storage), what would have to take place over the following 20-year period (to year 50) to address all the technical and policy issues necessary to make Phase 3 acceptable. We turn to Section 13.1 of the Report

¹ Note: The geological characteristics of the Labrador Trough, which extends through a large portion of Nunavik (northern Québec) make this part of Québec an unlikely candidate for technical reasons.

² Posing questions on the Adaptive Phased Management Approach, which contemplates transport and storage at new sites, should not be understood by NWMO to imply any interest in this option beyond Phase I - maintaining the waste at existing sites.

for guidance. Here we find a commitment to developing an Engagement Process which will lead to a final site selection and a technical description of a proposed project encompassing all surface and underground facilities, access and infrastructure requirements and a long-term monitoring program. An application for site preparation is made or intent to apply is then given. This triggers the environmental assessment process.

The Report further states:

"The implementing agency would be required to demonstrate, during the Environmental Assessment process, that there would be no significant adverse impact on the environment resulting from the construction, operation, decommissioning and closure of the deep geologic repository."

While not explicit, ITK is assuming that environment in the context is used broadly to include all social, economic and cultural considerations. In Chapter 14 of the Report, we find more detail. "The intention is to avoid or minimize significant socio-economic effects on a community's way of life or on its social, cultural or economic aspirations." (page 202). The Report then takes a comprehensive view, stating that "socio-economic effects management involves the coordinated application of mitigation, enhancement, compensation, monitoring and contingency measures and community liaison measures." (page 202).

We note in Section 14 the attention paid to exploring innovative ways to address the socio-economic effects and encourages NWMO to work direction with Aboriginal organizations to benefit from their experiences and on-going analyses of processes established to address Aboriginal concerns in other contexts. In northern Canada, Inuit have treaty-based environmental assessment regimes in which they participate equally with government officials in making decisions. The decision-making processes set out in these treaties also require consideration and accommodation of Inuit knowledge, perspectives and values.

Implicit in the environmental assessment processes established in our land claims agreements (as is the case generally in EIS processes) is the option that the project does not receive approval to proceed. We find no reference that this possibility is being entertained by NWMO. Nor do we find any reference to the possibility that all of the research, technical studies, etc. discussed in Chapter 16 could lead to a conclusion that there is insufficient confidence in safety aspects to support a decision to proceed. Rather, the underlying presumption of the Adaptive Phased Management option is that centralized, isolated containment will go forward. The timeframe may shift according to accepted science, but as stated on page 67 of the Report, "we can recommend the end point that we believe is the most desirable end state".

The Engagement Process will also need to pay particular attention to the views of Aboriginal Peoples, most often a minority voice in the larger debate. This could be even more acute in southern regions where Aboriginal Peoples are often demographically in a minority and politically marginalized. On behalf of other Aboriginal groups, ITK is concerned that their positions may be subsumed by the larger population if the process gets to the stage of searching for a host community. ITK urges the NWMO to be sensitive and alert to this possibility. This likelihood would further increase in a situation where there is an active lobby mounted in support of a site and a local Aboriginal group or community was opposed.

Finally, when reading this Report, we are left with the uneasy feeling that this huge and expensive effort is leading to a conclusion that collectively, as a society, we just don't yet know enough about how to safely manage nuclear fuel waste and yet, at the same time, will continue to produce it. The responsibility for decision-making is being pushed forward to future generations with the hope that science will have advanced to a point where more precise solutions are conceivable.

In our *Final Report on the National Inuit-specific Dialogues on the Long-term Management of Nuclear Waste in Canada* ITK advocates for a non-nuclear society in Canada where nuclear materials are neither mined, produced or transformed. We understand that this was not the mandate given to the NWMO. However, from the Inuit perspective, the long-term management of nuclear fuel waste is simply a component of the much larger issue of meeting Canada's energy needs into the future. Looking at the issue holistically requires consideration of broader questions of the role of hydrocarbons, nuclear fuel and renewables in the overall energy production picture. It is for this reason that Inuit brought forward recommendations related to alternative sources of energy that could eliminate the need to continue reliance on nuclear fuel.

ITK strongly encourages the Government of Canada to provide policy support and resources towards the development of alternative energy sources and energy conservation as the foundation for a truly sustainable "way forward".