



March 24, 2022

RE: Natural Resources Canada's Draft Policy on Radioactive Waste Management and Decommissioning

Moltex appreciates that Natural Resources Canada's draft policy incorporates many of the recommendations the company made during the initial call for input on waste minimization, waste storage facilities, decommissioning and waste disposal. The company also agrees with the Government of Canada's vision for radioactive waste management and the three policy principles intended to guide government commitments.

However, Moltex proposes that the final policy exclude draft commitment 1.5:

The federal government: ensures that the deployment of reprocessing technology in Canada, which allows for the extraction of fissile material from used nuclear fuel, is subject to policy approval by the Government of Canada to ensure that due consideration is given to all relevant factors, including ensuring the health, safety and security of people in Canada, as well as compliance with international safeguards and non-proliferation treaties, and respect for environmental considerations.

When Moltex assessed which country would be most suitable for developing its technology, Canada was a top choice, because it did not have any policies opposing reprocessing.

Draft commitment 1.5 requires a reprocessing policy; this would make it very difficult to attract investment until the reprocessing policy is finalized, which could take years. Moltex would likely not have come to Canada if a reprocessing policy had been mandated at the time.

Moltex believes that, before mandating a reprocessing policy, it would be beneficial to hear stakeholder views. Industry-government discussions on this topic are underway. Moltex is ready to support these discussions, and understands that they may eventually lead to a reprocessing policy. But mandating a reprocessing policy before discussions are complete is a barrier to funding – and consequently to advancing technologies that could lead to low-carbon power generation and a reduction in radioactive waste.

Uncertainty about the need for a reprocessing policy could also affect other companies pursuing innovation in minimizing nuclear waste, and may lead them to consider deployment of their technologies in other countries. For example, it could restrict companies that are evaluating ways of converting waste streams into more stable forms prior to storage and disposal.

Moltex values the opportunity to provide input on this matter, and looks forward to a final policy on radioactive waste management and decommissioning that considers the unique needs of companies pursuing waste reprocessing and minimization in Canada.

Sincerely,

Rory O'Sullivan
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