



The Right Honourable Mark Carney
Prime Minister of Canada
Office of the Prime Minister
Ottawa, Ontario

Re: Bill C-39 the Building Canada Strong Act

Dear Prime Minister Carney,

For more than 133 years, the National Council of Women of Canada (NCWC) has applied the precautionary principle in its advocacy and has urged the Government of Canada to apply it consistently when making decisions that affect people and the environment. When an activity, technology, or project may pose a serious or irreversible risk to human health, the environment, Indigenous rights, or future generations, caution is essential: the government should not permit the proposal to proceed merely because the full extent of the risk has not yet been proven with complete scientific certainty. Instead, it should pause or restrict the proposed activity, require an independent and transparent assessment of potential harms, consider safer alternatives, and place the burden on the proponent to demonstrate that the proposal is safe before it is allowed to proceed.

We believe this principle is critically important in decisions involving high-level nuclear waste, which presents potential risks over many thousands of years and requires the highest standard of independent scientific, environmental, health, safety, and economic review. It is on this basis that we respectfully draw your attention to our letters of June 8 and July 20.

In those letters, we expressed deep concern about Bill C-5 and the Government of Canada's fast-tracking of major projects without rigorous environmental protection. Our concern applies particularly to the Impact Assessment Act (IAA) and Canadian Nuclear Safety Commission (CNSC) review of the Nuclear Waste Management Organization's (NWMO) proposal for a deep geological repository for high-level nuclear waste in northern Ontario.

In those letters, we also raised a series of questions and made recommendations concerning:

- The rights of Indigenous Peoples under the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP);

- Environmental protections;
- The need for independent scientific evidence;
- The NWMO and CNSC's insufficient attention to the rapidly evolving economic opportunities presented by renewable energy systems.

We have yet to receive a response from the relevant ministries.

Nevertheless, your government has initiated an unusually accelerated parliamentary process for Bill C-39, the *Building Canada Strong Act*, leaving little opportunity for public or opposition-party input.

Bill C-39 would provide even weaker environmental protections than Bill C-5. If enacted, it would authorize the CNSC to determine the outcome of the NWMO's proposed deep geological repository without independent environmental, health, safety, or economic reviews. The CNSC has, over many years, not rejected a nuclear project. The legislation would similarly enable the fast-tracking of major projects across Canada.

NCWC is not alone in opposing Bill C-39. The bill has drawn strong criticism from Canadians who recognize that it would, in historically unprecedented ways, permit the construction of projects that could cause serious harm to the natural environment, wildlife and species, and the health and well-being of Canadians.

We therefore urge your government to pause the rush to approve Bill C-39. All political parties, Indigenous Peoples, members of the public, and independent experts should be able to present their evidence and views through the proper traditional processes of the House of Commons, the Senate, and the relevant parliamentary committees.

This would provide a fair, reliable, transparent, and democratic way forward.

Sincerely,

Penny Rankin
NCWC President

Gracia Janes
VP Environment

Cc:

The Honourable Julie Dabrusin-Minister of the Environment, Climate Change and Natures
The Honourable Rebecca Alty, Minister of Crown Indigenous Relations
The Honourable Tim Hodgeson Minister of Energy and Natural Resources
The Honourable Steve MacKinnon -Minster of Transport
The Honourable Natalie Provost -Secretary of State for Nature
The Honourable Joanne Thompson-Minister of Fisheries