

88 US and Canadian Groups Oppose Dumping Foreign Nuclear Hazardous Waste in Utah and US

December 17, 2025

Northwest Interstate Compact for Low-Level Nuclear Waste Management

c/o Office of Radiation Protection
Washington State Department of Health
309 Bradley Boulevard, Suite 201
Richland, WA 99352

Dear Northwest Interstate Compact Commissioners,

We, the undersigned 88 organizations in the US and Canada, stand firmly opposed to EnergySolutions' request to bring in foreign radioactive waste to the US for disposal. We ask you to reject the proposal to import 1.3 million cubic yards of Canadian radioactive and hazardous nuclear power waste over the next 10 years per the "Example Arrangement for Possibly Accepting LLRW Waste from the Province of Ontario, Canada for Disposal at the EnergySolutions Clive, Utah Facility".

Concerned international, national and community-based groups, experts, advocates, researchers, scientists, and the general public are opposed to importing foreign radioactive and hazardous nuclear power waste to the US. We ask you to vote against the request and stand to protect our communities.

We ask that you, as the responsible representatives of the 8 compact states, fulfill your obligation to fully review and understand the technical, legal and political consequences of and take responsibility for the monumental, precedent-setting decision before you. This would be the very first time that licensed-radioactive waste or radioactive hazardous waste from other countries would be permanently disposed in the United States. It could open the flood gates for more from Canada and all over the world.

Since the Commission agenda indicates that you are considering approving this request, please assure yourselves and the public that you are clear on all aspects and implications of such approval, and hold off on voting until you are. This is no ordinary vote, despite the way it is being presented. We ask each commissioner to be fully prepared before enabling this precedent-setting reversal of national policy.

Since the first Congressional authorization of interstate nuclear waste compacts in 1985, there have been no foreign-generated wastes permanently disposed in so-called "low-level" radioactive waste disposal facilities in this country. No compacts or states have accepted foreign waste. In fact, the Texas-Vermont Compact is expressly prohibited from "allow(ing) the importation of low-level radioactive waste of international origin for disposal."¹

There are many questions that must be answered to make a responsible decision on this vote. Below are questions and resources for your consideration.

¹ 31 Tex. Admin. Code § 675.23 - Importation of Waste from a Non-Party Generator for Disposal, Section (a) (4).

First, what is the radioactive content of the waste? How much plutonium, strontium and cesium? Over a million cubic yards is a volume of waste that does not reveal the “source term,” the amount and concentration of each of hundreds of long-lasting radionuclides, nor the chemical or physical form. This is even more important since the waste is mixed radioactive and hazardous. Although the Compact may not have express authority over hazardous waste, the presence of hazardous materials can greatly affect the characteristics of the nuclear waste—the ability to spread, ignite, interact and synergistically impact health impacts.

“Low-level” waste is not low risk, and much of it is not low-dose. Every amount of radioactivity can cause health damage. Significantly more females and youth get cancer than males at the same doses.² So-called “low-level” nuclear waste, even Class A, can give significant doses and includes elements with very long half-lives.

Congress just officially recognized the suffering of Utah residents downwind of the Nevada nuclear test site, expanding compensation under the Radiation Exposure Compensation Act to include the entire state. A community already burdened with the health effects of radioactive contamination does not need a new source of radioactive contamination and exposure from foreign sources.

Here are some of many serious questions that must be answered:

Public Interest, Transparency, and Precedent

- How does importing foreign radioactive waste benefit residents of the Northwest Interstate Compact states and the United States, and why should waste generated in other countries be transported through U.S. communities for disposal here?
- Why was this proposal not proactively disclosed to the public, and why should the Compact proceed without meaningfully engaging affected, concerned communities in the U.S. and Canada?
- What precedent would approval of this request set for future acceptance of foreign radioactive waste into the United States, including from countries other than Canada?

Waste Characterization and Radiological Inventory

- What types of radioactive waste comprise the more than 1 million cubic yards proposed for importation, and what is the complete ‘source term,’ including full inventory of all radionuclides, total quantities, concentrations, physical and chemical forms, and cumulative curies, expected to be imported?
- Will full and detailed waste characterization, including long-lived radionuclides such as plutonium, uranium, and thorium, be required and disclosed prior to Compact vote?

² Amanda M. Nichols, Mary Olson, 'Gender and Ionizing Radiation: Towards a New Research Agenda Addressing Disproportionate Harm', United Nations Institute for Disarmament Research, Geneva, 2024.

- What are the hazardous waste components and how might they affect the characteristics of the nuclear waste—the ability to spread, ignite, interact and synergistically impact health impacts?

Waste Origin and Generator Accountability

- Who are the waste generators and originating facilities? From what processes in the nuclear power fuel chain will the waste originate?
- Have any of the originating facilities experienced contamination events, compliance issues, or regulatory violations?

Financial Impacts, Incentives and the Big Picture

- How much revenue will EnergySolutions generate from this proposal? How much will be paid to the State of Utah? How much will benefit Utahns, and how do these financial benefits compare to the long-term environmental, public health, and liability risks borne by Utah and states through which the waste will travel? How much funding is set aside for any accidents or proliferation risks to Utah residents should an accident occur?
- Since EnergySolutions does business around the world, how likely are they to seek to import from more foreign countries? How likely is it that waste from their numerous processors will simply dispose here in the US? Has the larger vision of what is happening been realized and fully considered?

Legal Liability and Hazardous Waste Oversight

- Because this waste is both radioactive and hazardous, who will bear liability under the Resource Conservation and Recovery Act (RCRA) during transport, treatment, and disposal? Has the U.S. Environmental Protection Agency approved the hazardous waste importation?
- Who will be responsible for long-term liability in the event of contamination, releases, or regulatory violations?

Transportation, Safety, and Emergency Preparedness

- Through which countries, provinces, states, and communities will the waste be transported; what transportation modes and international points of entry will be used; and what advance notification, emergency preparedness, and protections will be provided for communities along transportation corridors?
- How much money and public notice will be provided to states through which the waste is transported for safety, preparedness and assurances?

Tribal Consultation and Environmental Justice

- Will shipments pass through or near Tribal lands, and if so, what tribal consultation has occurred or is planned, particularly with the Skull Valley Goshute Tribe, given the facility's proximity to their reservation?

Please reject the proposal to import foreign-made nuclear power waste into our country.

Sincerely, the undersigned

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