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**Statement of U.S. Section of the  
Women's International League for Peace and Freedom  
to be submitted at the public hearing on the SPEIS for  
*Complex Transformation* taking place in Washington D.C.  
March 25, 2008**

**The current SPEIS for the so called Complex Transformation** presented by the Department of Energy outlines plans very similar to those for Complex 2030 which has already been rejected by the U.S. Congress. These plans, if allowed to go forward, would not only seriously endanger our environment, they would lead to further global destabilization and insecurity. They defy the World Court ruling on the illegality of use or threat of use of nuclear weapons, and defy as well the Nuclear Non-Proliferation Treaty (NPT) which our government has ratified and which, under our Constitution, is part of the supreme law of our own land. They also defy the *Thirteen Practical Steps* toward the abolition of nuclear weapons 187 nations party to the NPT, including our own, agreed to take at the 2000 review conference on that treaty.

**We want to thank and commend all those individuals and organizations calling for a *No Production Alternative*** to this current SPEIS for *Complex Transformation*. We maintain that the alternative of producing no more nuclear weapons is the only one open to the United States if our nation is to support human rights, human security, democracy and the rule of law over the rule of brute force in our own nation and in the world.

**We of Women's International League for Peace and Freedom would like to augment the *No Production Alternative* by outlining what should be our concomitant steps in relation to the promise to achieve abolition of nuclear weapons inherent in the Non-Proliferation Treaty.** We include at the end of this document an outline of the thirteen practical steps our government has already promised to take, in cooperation with all nations of the world, in order to reach this goal.

**But first let us point out that threats to the environment of our planet alone make the plans outlined in Complex Transformation untenable.** These plans rely upon implementation of the Global Nuclear Energy Partnership which itself would lead to environmental disaster as outlined in the report of Robert Alvarez, Senior Policy Advisor to the U.S. Secretary of Energy from 1993 to 1999. That report concludes that the GNEP would squander billions in taxpayer dollars on an unproven reprocessing technology that will generate unprecedented and unmanageable amounts of highly radioactive wastes without plausible disposition paths. The Department of Energy is already failing to meet mandated goals for clean up of nuclear waste sites which endanger our rivers, our soil, and the lives of our citizens. Now Complex Transformation would bring still more nuclear waste to already dangerously toxic disposal sites and even includes ill advised plans for transporting radioactive waste from site to site across our nation.

**In addition redevelopment of the nuclear weapons complex would further adversely affect the environment and lives of Native Americans** whose lands are widely used, despite their protests, for radioactive waste storage, uranium mining, nuclear weapons development and for testing of ICBMs and other nuclear weapons delivery vehicles.

**And of course the ultimate danger to the environment** rests in the intent of those most actively promoting Complex Transformation to actually use nuclear weapons in future wars for dominance and resources. This willingness and intent is a threat to the existence of human life itself, and indeed, to all life on this planet which is our only home. We, as women, know the preciousness of each human life, and of the earth itself. We must not let our nation become destroyer of lives, lands and cultures or of the wondrous web of ecosystems that make our planet both beautiful and inhabitable.

**But we must do more than merely reject Complex Transformation.** As the alternative we must comply with the Nuclear Non-Proliferation Treaty and take concrete steps to ensure the security of our own and all peoples on this planet by cooperating in removing the threat of nuclear annihilation. Here follows a brief summary of those thirteen practical steps toward nuclear weapons abolition our government has already agreed to take, and which still remain the only sane alternative before us.

**The promises made in 2000 by the U.S. and 186 other nations are given in normal bold type, and current U.S. government positions are printed in italics. The items in bold italics are the steps the U.S. is actually obliged to take in order to comply with the Nuclear Non-Proliferation Treaty as well as the 13 Practical steps agreed to in 2000.**

**1. The United States promised in 2000 to sign and ratify the Comprehensive Nuclear Test Ban Treaty (CTBT).**

*President Clinton signed the treaty, but in 1999 the Senate rejected the CTBT, making it the only legislative body in the world to do so. Russia, Britain, and France had already ratified, and China was in the process when soon after his election President Bush made it clear ratification was no longer on the U.S. agenda. **Ratification of the CTBT should be at the top of the U.S. agenda, as urged by Henry Kissinger, George Schultz, William Perry, Sam Nunn and many other U.S. experts in foreign and military policy.***

**2. Promised to stop nuclear testing until the CTBT enters into force.**

Since 2002, the U.S. military budget has ominously included funds for possible resumption of nuclear testing. DOE is already conducting "sub-critical" nuclear tests at the Nevada Test Site which defy the intent of the moratorium, if not the actual wording. **The U.S. must not only fully comply**

**with the moratorium, it must encourage Israel, India and Pakistan to do so and accede to both the NPT and the CTBT.**

**3. Promised to work for a verifiable treaty prohibiting production of fissile material for nuclear weapons.**

*In 2006, the U.S. finally expressed interest in such negotiations, but rejects verification of the treaty or limitation of existing stocks. It also hopes to recover sufficient plutonium from reprocessing of nuclear waste (GNEP) for new plutonium pit production. **The U.S. should abandon the destabilizing and dangerous GNEP program and join in working for a verifiable fissile materials treaty that includes control of existing stocks.***

**4. Promised to support formation of a body within the Conference on Disarmament to work specifically on abolition of nuclear weapons.**

*The US originally resisted this approach, but in 2007 finally agreed to support a program of work in the CD that includes substantive discussions on the topic of nuclear disarmament. **Costa Rica and Malaysia have already introduced a model nuclear weapons treaty, updated in 2007, that can provide a substantial basis for discussions by the U.S. and other nations.***

**5. Promised to support the principle of irreversibility to apply to nuclear disarmament and related arms control measures.**

*Recent US national policy documents like the Nuclear Posture Review make it clear the US does not now support irreversibility. The SORT Treaty with Russia has no provision for either verification or irreversibility. **The U.S. must return to support of both irreversibility and verification, and must insist that other nations do so as well.***

**6. Promised an unequivocal undertaking, along with other nuclear weapons States, to accomplish the total elimination of all nuclear arsenals in order to achieve the nuclear disarmament to which all States parties are already committed under Article VI of the NPT.**

*The U.S Administration is requesting what will eventually be billions of dollars for the replacement of all existing nuclear warheads with the yet to be developed Reliable Replacement Warhead. The U.S. also argues that nuclear weapons “continue to have relevance in today's world.” That is incompatible with the NPT and with the World Court decision in 1996 that both use and threat of use of nuclear weapons is illegal under international law. **The U.S. Administration must abandon current plans for new nuclear weapons and, in compliance with its obligations under the NPT, commit to the elimination of nuclear weapons by initiating negotiations leading to conclusion of a verifiable treaty, under strict and effective international control.***

**7. Promised to implement existing nuclear disarmament treaties including START II and III and to preserve the ABM Treaty as a basis for further reductions.**

*The US backed out of the ABM Treaty in 2002 in order to pursue “missile defense.” In response, the Russian Federation withdrew from START II, which had not yet entered into force. Negotiations on START III were supposed to begin after START II entered into force. Meanwhile, START I is set to expire in December 2009 unless it is extended, but neither the U.S. nor Russia wishes to extend it in its current form. **The U.S. must negotiate with Russia an extension to START I before it expires. It must concurrently pursue a no production alternative. Complex Transformation and the RRW, coupled with aggressive development of so called “missile defense systems” are understandably perceived by Russia and most other nations as destabilizing offensive military policies rather than legitimate defense.***

**8. Promised to complete and implement the Trilateral Initiative between the USA, the Russian Federation and the International Atomic Energy Agency.**

*The U.S, Russia, and the IAEA have announced near completion of the negotiations, but have not yet been able to agree on the inspection and verification process for plutonium. Universal inspection and verification are necessary components of any arms reduction treaty and the U.S. must accept both as necessary components of nuclear weapons disarmament treaties as it has, to its credit, done in the case of the Chemical Weapons Convention.*

**9. Promised, together with the other nuclear weapons states, to practice transparency and confidence-building, to make step-by-step reductions in nuclear arsenals, to reduce non-strategic nuclear weapons, to reduce the operational status of nuclear weapon systems, to diminish the role of nuclear weapons in security policies, and to enter into a process leading to total elimination of nuclear weapons.**

*The U.S., under the Nuclear Posture Review and SORT, is slowly removing thousands of warheads from active deployment. However these warheads are not being destroyed and can be redeployed. The U.S. still declares that nuclear weapons are central to U.S. military strategy. It has also announced a policy of pre-emptive war, including possible first use of nuclear weapons against both nuclear and non-nuclear states. The U.S. must reverse its recent course and again enter into this good faith process as a leader, and use its influence to bring nations like India, Pakistan and Israel into the process as well.*

**10. Promised to stop the production of plutonium and to make certain that existing plutonium is not used for military purposes.**

*The U.S has put a small portion of its excess fissile material under IAEA supervision, but plans to produce new plutonium for use for triggers in proposed new nuclear weapons even though existing pits are reliable for 80-100 years. Approval of the current SPEIS would directly negate this promise. The only alternative consistent with international law, our own constitution and the future of the human race and our planet is the No Production alternative.*

**11. Reaffirmed that the ultimate objective of all States in the disarmament process is general and complete disarmament under effective international control.**

*The current U.S. government, to the contrary, is committed to the “rebuilding” of “America’s defenses.” The Administration policies include pre-emptive war and first use of nuclear weapons. The U.S. has higher military expenditures than the rest of the world combined, and weapons are its largest export. The US has not ratified the landmines treaty, the bio-weapons inspection protocol, or the CTBT. Its goal, sought also through missile defense and space weaponization, is “full spectrum dominance.” We in the U.S. must join in affirmation of general and complete disarmament as a goal for the sake of humanity and the values that have inspired our people, our constitution and our Bill of Rights since our inception as a nation.*

**12. Promised to report regularly within the NPT process on efforts leading to abolition of nuclear weapons, keeping in mind the declaration of the International Court of Justice in 1996 that nuclear weapons are illegal.**

*The current U.S. government supports only voluntary reporting and is ignoring the court decision. It is time to confirm and comply with the World Court decision for the sake of our own nation and the sake of humanity.*

**13. Promised to co-operate in developing the verification capabilities that will be required to provide assurance of compliance with nuclear disarmament agreements for the achievement and maintenance of a nuclear-weapons-free world.**

*The U.S. continues to operate the Cooperative Monitoring Center under the Sandia National Laboratories, which develops verification technologies. U.S. high-resolution space technologies could greatly increase verification reliability if they are used for that purpose. **We have much to contribute in the development of such technologies, and indeed, the process will offer many positive opportunities for scientists, engineers and contractors to engage in positive research and development that will enhance human life on earth, rather than destroy it.***

Sources: UN documents and [www.reachingcriticalwill.org](http://www.reachingcriticalwill.org) (WILPF at the UN) and [www.wilpf.org](http://www.wilpf.org) (WILPF Disarm Campaign).

**A kind of transformation is needed**, even a complex transformation, if we and our nation are to survive the century, but it is a transformation in ourselves. Let us not slip further into the ways of evil, of destroying, of killing, even on a massive scale. Let us not become the butchers and barbarians of the world.

**Long ago Mohandas K. Gandhi was asked by a reporter what he thought of western civilization.** He said he thought it would be a good idea. Let all of us participate in further civilization of ourselves and hence contribute to world civilization. Let us build rather than destroy. Let us treasure human life, rather than annihilate it. Surely use and threat of use of nuclear weapons have no place in civilization or in our human community. Surely no production of nuclear weapons and their global abolition is the only possible alternative open to us all.

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