

March 2, 2022

Dear Mr. Longpre:

On behalf of the Port Hope Community Health Concerns Committee (PHCHCC) I am sending this email with documents attached for consideration by members of the House Committee on Environment and Climate Change as they debate this important topic for citizens of Canada:

1. A letter from PHCHCC Chair to Prime Minister Trudeau and Minister of Energy O'Regan dated March 8, 2021 detailing our concerns with the \$1.2B cleanup of radioactive wastes in the Port Hope community.
2. Reply by email to PHCHCC Chair from Minister O'Regan dated June 1, 2021.
3. A link to a PHCHCC power point deck (available on NRCAN website) which we presented March 17, 2021 to a wide range of interested parties sponsored by the Ontario organization Protect our Waterways - No Nuclear Waste.
<https://www.nrcan.gc.ca/sites/nrcan/files/engagements/radwaste/PHCHCCPresentation%2017March%202021%20%20final.pptx.pdf>

Our presentation provides a brief commentary on Port Hope's 90+ year experience with two nuclear industries in the town and the discovery of radioactive wastes issues first reported to the federal government in 1966 by Dr. Douglas Andrews, nuclear engineer at the University of Toronto hired by the RCMP to investigate dangers of unsecured access to uranium in the town.

4. May 31, 2021 key recommendations excerpted below from a PHCHCC email submission to the NRCAN Radwaste Review:

- full disclosure of locations of public and private contaminated properties to all citizens.
- regulate from the basic scientific fact that inhalation of radioactive particulate is 200 times more biologically impactful to a person than ingestion (Ontario MOEE) and must be avoided
- fund independent health investigations, ongoing health monitoring with public reporting.
- full transparency of issues and plans prior to agreements for remediation with impacted communities and residents.
- establish cleanup criteria based on precautionary health considerations with no weakening over time for budget or convenience reasons.
- mandatory remediations for a comprehensive cleanup and to remove unsuspecting health risks from future generations.
- restore contaminated public and private properties to unfettered use
- ensure ongoing appropriate budget allocations for investigations, remediations, restorations, transportation, long-term storage and monitoring, compensation to impacted communities and individuals, independent oversight and reviews.
- sites must be away from lakes, rivers, watersheds and urban areas.
- respect the lasting danger, require signage, a significant buffer zone. In the words of Chief Ron Tremblay, it is Forever Dangerous.
- do not permit irresponsible development of housing and sports facilities beside or on top of waste sites
- honour commitments to communities.
- do not coerce or back communities into corners that force changes contrary to agreements and their best interests.
- do not permit misinformation, lies, obfuscations to be given out publicly by proponents.
- critical decision-making should be independent of and not made by proponents and their many sub-contractors.
- thorough public processes such as comprehensive environmental assessments to examine and critique proposals is essential with funding for independent participation made available.

- significant changes to legal agreements with communities should NOT be initiated during a pandemic, nor at all by contractors.
- require active ongoing engagement of relevant federal, provincial, municipal, First Nations governments.
- acknowledge risks of terrorism with "dirty" material, require essential security measures.
- wastes must be well-documented, accurately understood, well labelled, well contained and stored however long, but temporarily in a manner that is well monitored and retrievable into the future.
- critical is regulation in a manner that accepts radioactive waste is never and can never be "disposed of"

PHCHCC fully supports key principles and policies below recommended by Nuclear Waste Watch, the voices of concerned and knowledgeable individuals and organizations who have collaborated to provide input during this review via Ministry consultation sessions and other avenues provided.

Foundation: the *United Nations Declaration of the Rights of Indigenous People, Article 29 2.*
States shall take effective measures to ensure that no storage or disposal of hazardous materials shall take place in the lands or territories of indigenous peoples without their free, prior and informed consent.

Recommended Key Principles:

- Transparency, openness and traceability
- Precautionary principle
- Community right to know
- Protection of human health and the environment
- Oversight and accountability
- Peace, Order and Good Government

further

- Canada needs an independent agency, arms-length from government and industry, to oversee radioactive waste management and decommissioning
- Radioactive waste should NOT be abandoned; policy should direct perpetual care and monitoring
- Government and industry must be open and transparent in the management of radioactive waste and its transportation; Indigenous peoples and other Canadians have a right to access information, to engage in decision-making, and to know the risks
- No importing of radioactive waste from other countries
- No plutonium extraction (reprocessing or pyro-processing) of radioactive fuel waste

Waste Minimization:

- Prohibition on reprocessing irradiated fuel should continue
- The extraction of plutonium must be explicitly prohibited
- Practice of "free release" of radioactive materials should be discontinued
- Detailed tracking of all radioactive materials, including (very) low level radioactive wastes
- Waste characterizations and inventories must be detailed, current, and peer / public reviewed and accessible

Waste Storage:

- Design, operations and monitoring for fuel waste storage systems should be open and transparent, and include public access to information

- Storage systems should be designed to minimize risk and maximize protection of human health and the environment
- Waste storage systems should be passively safe, should be “hardened” against extreme weather and malevolent acts, and should be dispersed across the site, at the point of generation

Waste Disposal

- The notion of “disposal” should be replaced by an approach of long-term care and stewardship
- Independence and transparency should be integrated throughout the radioactive waste policy
- Agencies responsible for radioactive waste research and oversight should be independent of the nuclear industry
- Canada’s nuclear regulator should report directly to parliament
- Indigenous peoples and the public should be engaged in policy and project development and review, with funded access to legal and technical advisors and all relevant documentation.

Decommissioning:

- Decommissioning approaches must at minimum conform to international safety standards.
- Decommissioning planning and implementation should be information based, including full information about the condition of the site (such as contamination of soil, ground or surface water) and a full inventory of radioactive wastes (on site and decommissioning wastes)
- Information must be publicly available and peer reviewed, including by the public and Indigenous peoples
- All decommissioning projects must include a comprehensive strategy for the transmission of information and knowledge to future generations
- End state objectives should be based on ecological and human health and the decommissioning work must show that the site has been fully remediated and is now fully safe.

Thank you for coordinating submission of these documents from the Port Hope Community Health Concerns Committee, including this email, to the members of the House Committee on Environment and Climate Change for their consideration.

Respectfully submitted by
Faye More, Chair
on behalf of
The Port Hope Community Health Concerns Committee

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