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Sent: Thursday, February 02, 2006 8:52 AM
Subject: [Energy-vision] Fw: Proposed amendments to the CEAA Exclusion List Regulations

This is CFRE's submission on CEAA's proposed Amendments.

Cheers, Ziggy.

----- Original Message -----

From: S. (Ziggy) Kleinau

To: John D. Smith

Sent: Tuesday, January 31, 2006 5:33 PM

Subject: Proposed amendments to the CEAA Exclusion List Regulations

John D. Smith,
Director, Legislative and Regulatory Affairs
Ottawa, ON, K1A 0H3

January 31, 2006

Dear Sir,

in response to a not widely publicised comment period on the proposed amendments to the Exclusion List Regulations of the Canadian Environmental Assessment Act(CEAA) we are filing the following comments on behalf of the members and directors of Citizens For Renewable Energy(CFRE).

CFRE is a non-profit organization incorporated in Ontario in 1996 and comprises approximately one thousand members across the province and others in all provinces of Canada.

The CEAA was established on the Precautionary Principle, meaning that planned projects should undergo detailed and strict scrutiny as to their impact on environmental and public health.

This would particularly be the case in anything pertaining to nuclear energy.

The proposed amendments are an attempt to streamline the application of the Act. There is a very distinct danger of underestimating any of the activities mentioned in the proposed amendments in Part 4, Nuclear Energy.

We already are VERY concerned with the application of the ALARA principle and it's containing the reference to 'economical' limitation. The whole risk assessment exercise continuously applied in the evaluation of 'significant adverse environmental effects' is flawed because it relies on ASSUMED SAFE exposure levels.

The REVERSE ONUS assessment as publicized in several of the latest Biennial Reports of the International Joint Commission(IJC) will have to be applied in every undertaking of activity related to nuclear energy, be it in power generation, research application or the public health field.

As the latest BEIR VII report shows there is *no level of radiation* from nuclear energy that is safe to the human population.

We have to remind regulators that there have been significant new findings in studies on radiation health effects and these have NOT been taken into account even in the existing regulations of the CEAA.

WE STRONGLY OPPOSE THE PROPOSED AMENDMENTS, ADDING THE DESCRIBED ACTIVITIES TO THE EXCLUSION LIST UNDER THE CEAA, AND EXPECT THAT THE EXISTING ITEMS ALREADY ON THE EXCLUSION LIST BE REVISITED IN LIGHT OF THE NEW FINDINGS AS EVIDENCED FROM HIGH-PROFILE SCIENTIFIC BODIES LIKE THE BEIR!

Thank you for accepting these comments provided on behalf of the members and directors of Citizens For Renewable Energy. We would be prepared to elaborate further regarding the reasons for our strong rejection to including the proposed activities in Part 4 in the Exclusion List Regulations.

Respectfully submitted by

S.(Ziggy) Kleinau, Coordinator, CFRE

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