

Reply-To: mcclenaghan@execulink.com
Sensitivity: Normal
Importance: Normal
To: "charlene@lao.on.ca" <charlene@lao.on.ca>
Subject: Fw: Bruce rad-waste EA
From: "Theresa McClenaghan" <mcclenaghan@execulink.com>
Date: Thu, 16 Mar 2006 22:21:13 +0000 GMT
Return-Path: mcclenaghan@rogers.blackberry.net

Print all for review. Theresa

Theresa McClenaghan
Counsel
Canadian Environmental Law Association
Suite 301 130 Spadina Ave. Toronto
416-960-2284 ext. 218
cell phone 519-755-7579

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

From: "Dave Martin" <dave.martin@yto.greenpeace.org>
Date: Thu, 16 Mar 2006 12:08:53
To: mcclenaghan@execulink.com
Subject: Bruce rad-waste EA

Hi Theresa,

I have enclosed copies of Greenpeace letters to the feds and province on the federal environmental assessment process that has been started on the OPG low- and intermediate-level radioactive waste site at Bruce (see the CEAA and CNSC EA registries for background). It is expected that the draft terms of reference will be out for 30 day comment sometime in May.

We are asking the feds for a bump-up from comp study to panel and we are asking the province for a joint panel review (i.e. a joint provincial/federal environmental assessment).

Would CELA also consider doing letters?

Cheers,
Dave Martin

~~~~~  
David H. Martin, Energy Co-ordinator, Greenpeace Canada  
250 Dundas St. W., Suite 605  
Toronto, Ontario, Canada M5T 2Z5  
TEL 416-597-8408 X3050 CELL 416-627-5004 FAX 416-597-8422  
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---- File information -----

File: Bruce joint review request to Broten.doc  
Date: 6 Mar 2006, 18:19  
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File: Bruce bump-up request.doc  
Date: 1 Mar 2006, 19:19  
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Type: Unknown



250 Dundas St. West, Suite 605 Toronto, Ontario, Canada M5T 2Z5  
Tel: 416-597-8408 X 3050

March 1, 2006

Hon. Rona Ambrose  
Minister of the Environment  
House of Commons  
Ottawa, Ontario K1A 0A6  
Telephone: 613-996-9778 Fax: 613-996-0785  
E-Mail: Ambrose.R@parl.gc.ca

Dear Ms. Ambrose,

**Re: Environmental Assessment on Deep Geologic Repository for Low and Intermediate Level Radioactive Wastes, Tiverton (ON); CEAR reference number 06-03-17520**

I am writing to formally request a bump-up of the current environmental assessment on *Deep Geologic Repository for Low and Intermediate Level Radioactive Wastes, Tiverton (ON)*; CEAR reference number 06-03-17520, from a Comprehensive Study to a Panel Review. As you may be aware, this proposal by Ontario Power Generation would see the construction of the radioactive waste dump at its Bruce nuclear site.

The radioactive waste at this site is extremely long-lived, and will ultimately be neither monitored nor retrievable. For this reason, Greenpeace Canada is opposed to deep geological disposal of radioactive waste.

A panel review of this project is justified on a number of grounds:

- This proposal for deep geological disposal of radioactive waste is unprecedented in Canada, and should be treated with special consideration because of its precedent-setting nature for subsequent low- and intermediate-level waste sites, as well as high level radioactive waste sites.
- A deep geological disposal site for radioactive waste on the edge of Lake Huron is likely to have significant environmental impacts with transboundary implications. Radiological contamination of the Great Lakes by Canadian nuclear facilities has already been recognized as a cause for concern by the International Joint Commission on Great Lakes Water Quality.

- The so-called "low- and intermediate-level" radioactive wastes at the site will include many radioisotopes which are extremely long-lived, and remain hazardous for hundreds of thousands of years. For example, Plutonium-239, present in both low- and intermediate-levels wastes has a half-life of 24,300 years, meaning that it will remain toxic for close to a quarter-million years.
- There is particular public concern about radioactive waste disposal amongst the public. Polling conducted by Greenpeace on the topic of high-level radioactive waste indicates that 87% of respondents opposed the siting of a radioactive waste facility in their community, and 71% oppose even the transportation of waste through their communities.

Thank you for your consideration of our request.

Sincerely,

A handwritten signature in black ink, appearing to read "David H. Martin", with a long horizontal stroke extending to the right.

David H. Martin  
Energy Coordinator, Greenpeace Canada

C.C. Linda Keen, President and CEO Canadian Nuclear Safety Commission



250 Dundas St. West, Suite 605 Toronto, Ontario, Canada M5T 2Z5  
Tel: 416-597-8408 X 3050

March 7, 2006

Hon. Laurel Broten  
Minister of the Environment  
135 St. Clair Ave W, 12th Flr  
Toronto ON M4V 1P5  
**E-mail: lbroten.mpp@liberal.ola.org**  
**By Fax : 416-314-6748 – 2 pages**

Dear Minister Broten,

**Re: Environmental Assessment on Deep Geologic Repository for Low and Intermediate Level Radioactive Wastes, Tiverton (ON); CEAR reference number 06-03-17520**

As you may be aware, the federal government has initiated a Comprehensive Study environmental assessment known as the *Deep Geologic Repository for Low and Intermediate Level Radioactive Wastes, Tiverton (ON)*; CEAR reference number 06-03-17520. This proposal by Ontario Power Generation (OPG) would see the construction of Canada's first deep geological radioactive waste dump at its Bruce nuclear facility on the shore of Lake Huron.

The radioactive waste at this site is extremely long-lived, and will ultimately be neither monitored nor retrievable. For this reason, Greenpeace Canada is opposed to deep geological disposal of radioactive waste.

I am writing to urge you to request that this review become a joint provincial/federal panel review, a process which we understand is already allowed under a harmonization agreement.

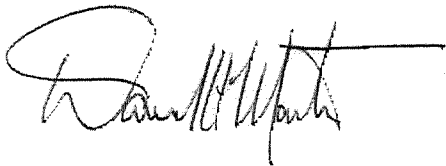
A joint review panel review of this project is justified on a number of grounds:

- This proposal for deep geological disposal of radioactive waste is unprecedented in Canada, and should be treated with special consideration because of its precedent-setting nature for subsequent low- and intermediate-level waste sites, as well as a high level radioactive waste site in Ontario.
- OPG is a company under the Ontario Business Corporations Act, whose sole shareholder is Her Majesty the Queen in Right of the Province of Ontario. OPG is responsible for the production of at about 90% of the radioactive waste in Canada.

- A deep geological disposal site for radioactive waste on the edge of Lake Huron is likely to have significant environmental impacts with transboundary implications. Radiological contamination of the Great Lakes by Canadian nuclear facilities has already been recognized as a cause for concern by the International Joint Commission on Great Lakes Water Quality.
- The so-called "low- and intermediate-level" radioactive wastes at the site will include many radioisotopes which are extremely long-lived, and remain hazardous for hundreds of thousands of years. For example, Plutonium-239, present in both low- and intermediate-levels wastes has a half-life of 24,300 years, meaning that it will remain toxic for close to a quarter-million years.
- There is particular public concern about radioactive waste disposal amongst the public. Polling conducted by Greenpeace on the topic of high-level radioactive waste indicates that 87% of respondents opposed the siting of a radioactive waste facility in their community, and 71% oppose even the transportation of waste through their communities.

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David H. Martin  
Energy Coordinator, Greenpeace Canada

C.C. Linda Keen, President and CEO Canadian Nuclear Safety Commission  
Dalton McGuinty, Premier of Ontario  
Howard Hampton, Leader, New Democratic Party of Ontario  
John Tory, Leader, Progressive Conservative Party of Ontario  
Frank de Jong, Leader, Green Party of Ontario  
Gord Miller, Environmental Commissioner of Ontario  
Toby Vigod, Chair, Environmental Review Tribunal