Canadian Nuclear Safety Commission



Commission canadienne de sûreté nucléaire

President

Président

ccm 2015-000362

JUL 2 7 2015

The Honourable David Heurtel, M.N.A. Minister of Sustainable Development, Environment and the Fight against Climate Change 675, boul. René-Lévesque Est 30th Floor Quebec, QC G1R 5V7

Dear Minister,

The recently published Bureau d'audiences publiques sur l'environnement (BAPE) report compels me to write to you. It is very troubling to have the BAPE present your government with conclusions and recommendations that lack scientific basis and rigour. Furthermore, to suggest that uranium mining is unsafe is to imply that the Canadian Nuclear Safety Commission (CNSC) and the Government of Saskatchewan have been irresponsible in their approval and oversight of the uranium mines of Canada for the last 30 years.

The CNSC welcomed the Government of Quebec's decision to hold hearings to study the impacts of uranium exploration and mining in the province. Our experts fully participated in the BAPE's public process to inform and educate the BAPE on how we regulate the industry and ensure that the public, workers and the environment are protected. The BAPE's decision to continue to question the long-standing science and proven safe track record of modern uranium mining is misleading Quebecers and all Canadians.

It is our mandate to promote and enforce nuclear safety, and the CNSC takes exception to the BAPE's assertions that uranium mining is not safe.

At the BAPE's request, our staff – who are recognized internationally as scientific and regulatory experts – provided numerous submissions on how the CNSC oversees and monitors all aspects of a uranium operation to ensure safety, including environmental and radiation protection, worker health and safety, tailings and waste rock management, emergency preparedness and safe uranium transport. Our experts were available to the BAPE and appeared on the many days of hearings to support the panel's work. Solid, factual evidence was given on how Canadian nuclear activities are among the safest and most secure in the world due to stringent CNSC regulatory requirements.

We are also fully transparent in our regulatory oversight of uranium mines and mills, with a public hearingbased licensing process and annual reporting of operational safety and environmental performance. This represents a level of transparency and oversight practiced by no other industry in Canada.



While certain individuals or groups may have their diverse reasons to call for a permanent moratorium on uranium mining, their assertions regarding the health impacts on the public and environment are fundamentally flawed, as they ignore factual scientific research that has been conducted in these areas. We have carried out and validated several peer-reviewed studies over the past several decades. These studies have repeatedly provided sound evidence that workers and residents near these facilities are as healthy as the rest of the general population. The same is true of people who live near nuclear power plants.

The BAPE's report raised concerns that uranium is radioactive and that uranium tailings are dangerous for thousands of years. The reality is that every type of mining or industrial activity produces waste that needs to be effectively managed well into the future. All mines, including uranium mines, generate waste that contains both radiological and non-radiological contaminants of varying concentrations. All modern uranium tailings management facilities operating in Canada employ underground, in-pit tailings disposal that eliminates any risk of tailings dam accidents such as the one recently experienced at the Mount Polley copper and gold mine in British Columbia. Uranium mines have been the top environmental performers in the mining sector since the federal Metal Mining Effluent Regulations came into force in 2004.

We would never compromise safety by issuing a licence or allowing a uranium mine or mill to operate if it were not safe to do so. Furthermore, Canada is fully committed to international agreements on the peaceful use of nuclear energy to ensure that no uranium from Canada is used to produce nuclear weapons.

It is clear that the BAPE's recommendation not to proceed is based on the perceived lack of social acceptance and not on proven science. I would like to remind the Minister of CNSC's decision in 2013 involving a uranium project in northern Quebec (Strateco) where a panel of the Commission, which included a former BAPE president, determined that it was safe to proceed.

Minister, I understand that you will be reviewing the BAPE report's conclusions through an interdepartmental committee. I would like to offer CNSC experts once again to assist in that process, as the BAPE did not accurately synthesize and fully consider the information previously provided. As your government moves forward on this important matter, it must not ignore years of evidence-based scientific research on this industry. It is one of the most understood types of mining in Canada and has been safely undertaken in Saskatchewan for over 30 years.

Yours sincerely,

Michael Binder

c.c.: Pierre Baril, President of the BAPE

Binds