Canadian Nuclear Safety Commission

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Supplementary Information Oral Presentation

Presentation from Justice, Peace and Integrity of Creation Office of the Sisters of St. Vincent de Paul

Renseignements supplémentaires Exposé oral

Présentation de Justice, Peace and Integrity of Creation Office of the Sisters of St. Vincent de Paul

In the Matter of the

À l'égard de

BWXT Nuclear Energy Canada Inc., **Toronto and Peterborough Facilities**

BWXT Nuclear Energy Canada Inc., installations de Toronto et Peterborough

Application for the renewal of the licence for Toronto and Peterborough facilities

Demande de renouvellement du permis pour les installations de Toronto et Peterborough

Commission Public Hearing

Audience publique de la Commission

March 2 to 6, 2020

Du 2 au 6 mars 2020



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OFFICE, SISTERS OF PROVIDENCE OF ST. VINCENT DF PAUI

INTERVENTION RE: BWXT LICENSE RENEWAL

03/04/2020

WHO WE ARE:

- -the Sisters of Providence of St. Vincent de Paul are an order of women religious founded in 1861 in Kingston, Ontario
- -The Sisters seek to empower others, especially the poor and oppressed, to achieve a quality of life in keeping with their human dignity
- -Today, the Sisters are engaged in works of peace, social justice, ecology, education, wellness and spirituality
- -In 2019, the Sisters created a new position Lead, Integrity of Creation and Climate Change to advance this work
- -In that role, I educate, organize, and advocate for climate change mitigation, adaptation, and justice at the municipal, provincial, and federal levels

In 2019, the City of Peterborough declared a Climate Emergency

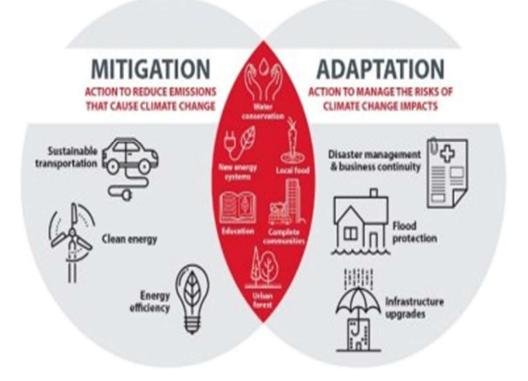


- -In response to this emergency regional stakeholders have created a Climate Action Plan
- -the Plan aims to increase "sustainability across all ten municipalities, Curve Lake First Nation, and Hiawatha First Nation"



Sustainable Peterborough CLIMATE CHANGE ACTION PLAN

Building Climate Resilience



- -A changing climate requires mitigation, and adaptation
- -the Plan notes that MOECC data shows provincial average temperature is up 1.4 C over the last 60 years, could rise another 2.5-3.7 C by 2050
- -this comes with an increased probability of extreme heat, flooding, and extreme wind

-in 2004, a storm dumped 14 billion litres of water on Peterborough, causing severe

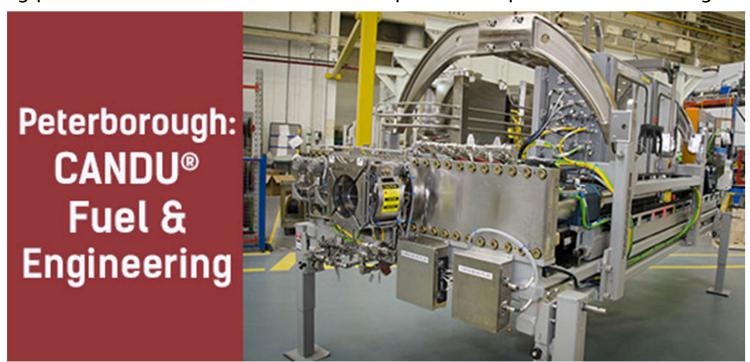


The reality of a changing climate, and the region's own commitments to climate change adaptation and resilience, require applications such as this one be looked at afresh through a climate change lens.



It is our view that the BWXT license renewal application does not pay sufficient attention to what a changing climate demands of its proposed Peterborough operations.

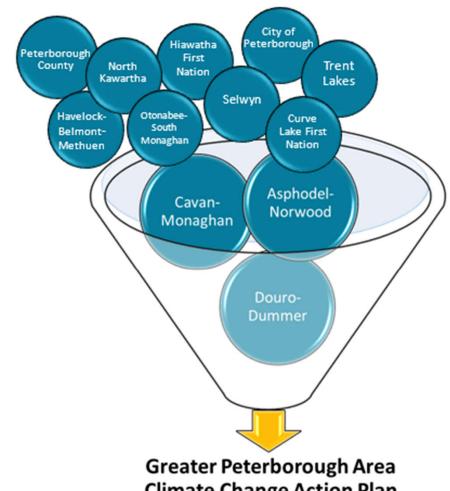
- -BWXT's ERA and Application do not specifically address sustainability as it relates to climate change adaptation
- -BWXT's ERA and Application do not integrate *adaptive management* as a framework to ensure safe operations that are responsive to
- 1)a changing climate and its increased occurrences of extreme weather and natural disasters and
- 2) changing political and economic realities in response to expected climate change



-the temperature, wind, and precipitation data in the ERA are from 1981-2015.

-this does not account for how the region's climate may change over the next 30 years

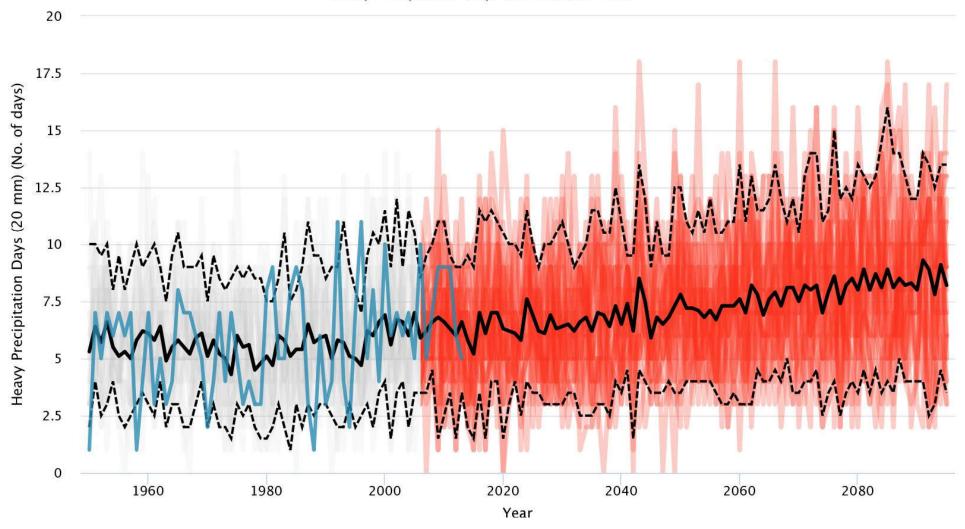
-the FRA in its entirety does not consider how climate change affects the project's possible



Climate Change Action Plan

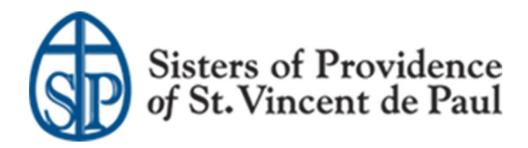
Municipality: Peterborough

Heavy Precipitation Days (20 mm) (RCP 8.5)



RECOMMENDATIONS:

- 1. JPIC recommends that the request for a 10-year renewal be denied by CNSC; such a time frame is too inflexible to assess and address a changing local climate and changing concerns brought up by the community's Climate Action Plan
- 2. JPIC supports CARN Peterborough's recommendation that "the CNSC must require BWXT to provide a detailed explanation of how the CNSC guiding principles of sustainability, precaution, and adaptive management were applied in analysis"
- 3. JPIC also supports the recommendation that "a greater range of nuclear projects and facilities should be designated for review under the federal Impact Assessment Act" so that a fuller, more robust consideration of how these facilities and their communities can best adapt to a changing climate is done



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