



File / dossier : 6.01.07

Date: 2020-01-27

Edocs: 6108516

**Oral Presentation**

**Exposé oral**

**Written submission from  
Margaret Smith**

**Mémoire de  
Margaret Smith**

In the Matter of the

À l'égard de

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

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

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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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Submission to the CNSC in Support of the Application from BWXT Nuclear Energy Canada Inc. to renew its Class IB Fuel Facility Operating License for a period of 10 years.

Prepared for the Public Hearing, March 2 and 3, 2020

Submitted by Margaret Smith

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Today I will not be addressing any aspect of the BWXT technical operations, or its environmental, safety and human health performance. I am satisfied that the plant is well regulated and has a long record of safety and environmental responsibility.

The purpose of my presentation is two-fold. First I wish to commend BWXT for their improved Public Information Program. Second, I would like to suggest ways that could improve open and traceable community relationships which I believe the CNSC should encourage through this licensing process.

I first became involved with then GE-Hitachi in 2013. In late 2012, news reports identified community concerns about the Lansdowne Avenue plant's operation. Public meetings were held, one of these in December 2012 was hosted by our Member of Parliament. In response, GE-Hitachi hosted a public Open House and organized a Community Liaison Committee. The level of community concern ultimately led to a CNSC public meeting in December 2013 in Toronto.

As much as GE-Hitachi recognized the seriousness of public concerns, it resisted a full community relationship building approach, frustrating many on the CLC. Local operations staff were given responsibility for the CLC instead of community relations professionals. Several ideas for community outreach were suggested, but not acted on. GE-Hitachi staff were very receptive but could not seem to get senior management approval. This situation was improved somewhat in late 2015 when responsibility for the CLC was passed to a Manager for Community Relations and Communications. However, this person was based in Peterborough. The work was now seen as proactive, rather than reactive. Efforts were stepped up to recruit new CLC members. Newsletters were distributed to the local community. Plant tours were continued. CLC members recommended a Community Barbeque, which was initiated in 2015, and was well received. The CLC also recommended public attitude surveying in the local community area to better appreciate local concerns and preferences for engagement. A list of local community groups and organizations was compiled to improve community outreach. However, big changes started happening only after the December 2016 acquisition of GE-Hitachi by BWXT NEC.

Senior BWXT management attended meetings to be part of the conversation and to assure us that stewardship is one of BWXT's core values, meaning a commitment to the communities in which they operate. The website was improved. Tours continued. Community outreach was initiated in earnest, with a local public school and a neighbourhood centre. BWXT sponsored a robotics team at a local high school and worked to establish a bursary for post-secondary STEM education. BWXT joined the Canadian Council for Aboriginal Business. The barbeque continued as a successful annual event. Recruitment of new CLC members continued through mailings, a fence banner, social media and website advertising. Extensive charitable giving was initiated.

My understanding is that many of these activities occur in Peterborough, with the exception of the Community Liaison Committee. However, Peterborough is soon to have a CLC too.

In January 2019 a new BWXT staff member took over the CLC, The Manager of Communications and Government Relations, and again, this person is not based locally, but in Cambridge.

In spite of all these good intentions in Peterborough and in Toronto, BWXT faces considerable negative public reaction to the relicensing application. It is important therefore to consider what else could be done to ensure community knowledge and confidence in BWXT's operation.

In the BWXT license renewal application, Section 5.4 sets out its Public Information Program. It states:

*BWXT NEC is committed to connecting with the communities in which it operates in a timely, transparent and meaningful way and recognizes that the most effective way to build and sustain public trust is to maintain environmental excellence while fostering an atmosphere of openness and transparency with stakeholders and other interested parties.*

I agree that public trust is essential and bears directly on whether or not the public believes what BWXT says. However, research and experience clearly indicates that building and sustaining public trust requires more than providing information in a timely manner.

When dealing with detailed technical information, sometimes it is hard to be confident that one has all the necessary information, or to feel confident to be able to differentiate between conflicting information. Nuclear information is already value laden. Sometimes the public may not be certain *what* to believe, and may decide *who* to believe, who can be trusted. In order for the public to trust a company, it must demonstrate that it shares the values of the public, that it is open, and is seen to be open, and inclusive in its dialogue with the community, that it listens and hears the views and concerns of its community, and demonstrates that understanding in its actions. All of these actions can help to build community trust. For BWXT, or any nuclear entity, how trust is earned is more complicated than simply being open and transparent.

Voluntary community stewardship activities are important in determining whether a company is perceived as trustworthy and credible. These activities include actions seen as beyond what is required such as building relationships with various community stakeholders. Stewardship activities can demonstrate that the company understands the community's needs, is concerned for them and shares their values.

*BWXT states that it seeks to learn more about community priorities, interests and activities, and improve how BWXT NEC shares information about work at the Lansdowne Avenue facility, health & safety initiatives and community activities.*

For the first time, BWXT NEC undertook public attitude survey, conducted by Ipsos in October and November of 2018. The stated objective of the survey was to understand the level of awareness about BWXT among neighbourhood residents. A 10-minute online and telephone survey was conducted in Toronto and Peterborough among residents who lived in proximity to the facilities. The results are based on 149 responses from the Toronto area and 203 responses in Peterborough. The results indicated the following:

- 17 percent of Toronto respondents had recently read/seen/heard about BWXT NEC. Among those who have recently heard about BWXT NEC, the majority received a company newsletter/flyer/brochure, followed by the community BBQs.

- Three in 10 Toronto respondents said they are very/somewhat knowledgeable about BWXT NEC and over half of Toronto respondents say they've never heard of the organization, or that they are not at all knowledgeable.
- Among those local residents who are aware of BWXT NEC, just under 4 in 10 of the Toronto respondents said they have an excellent/very good/good impression of BWXT NEC.
- Two-thirds of Toronto respondents who are aware of BWXT NEC said they have confidence the company operates safely, and half or more agree it contributes to the local economy, is responsibly managed and takes environmental concerns seriously.

I believe that undertaking this survey is a great first step for BWXT. The results indicate a baseline and much room to improve local awareness and involvement. These results also suggest more than just providing information is needed. Although BWXT has a much different approach to the communities in which it operates than did GE-Hitachi, there is clearly a need to continue to improve.

More work needs to focus on stewardship activities and building trust.

An integrated communications and community relations plan is needed. A strategic approach would see the coordination and integration of information programs, sponsorship programs, and community partnerships. What is now characterized as 'charitable giving' should be integrated within a broad stewardship function.

BWXT NEC has developed a 'charitable giving initiative' in the Toronto community. BWXT NEC supports Western Technical Commercial School's FIRST Robotics team through a team sponsorship and student bursary. It supports the Pauline Junior Public School through a donation to assist in the purchase of classroom tools that support STEM (Science, Technology, Engineering and Math). BWXT also supports the Davenport-Perth Community Health Centre which provides key services to the local community. BWXT NEC is also researching other community organizations, looking for other partnership opportunities. Understanding these initiatives as part of a stewardship function would strengthen outreach and help build community trust.

BWXT should demonstrate that it takes its local communities seriously and wants to build strong community relationships by assigning dedicated Communications and Community Relations staff to each of its plants in Toronto and Peterborough. Locally-based managers could continue to develop a better in-depth understanding of its influence area, attend local meetings, build personal relationships, and expand its stewardship activities.

The Community Liaison Committee could be better shaped to reflect the local community. As relationships are forged, direct invitations could be extended to community groups and partners to send representatives to join the CLC. The CLC could be a resource in the future to help design any follow-up surveys and to discuss results. Local residents have insights into local issues and could suggest ways to improve community relationships.

BWXT NEC submitted a document with its application, "Public Information and Disclosure Program," EHS-PRPM-003, Rev 04, 12 May 2017. This report does not seem to be available through the website, and I have not seen it. Members of the CLC could help to provide feedback in the development and execution of an integrated community information and stewardship plan.

The CNSC's task is to ensure the safe use of nuclear energy and materials, protecting human health and the environment. To that end, the Public Information Program should be reconstituted to ensure a meaningful community relationship that helps to build trust and confidence in BWXT's operation. In summary, that plan would comprise an integrated, strategic communications and community relations plan, comprising a) information programs, sponsorship programs, and community partnerships; b) dedicated Communications and Community Relations staff in Toronto and Peterborough, and c) a more dynamic role for the CLC. I believe that these measures could improve open and traceable community relationships. I do believe the CNSC should encourage these objectives through this licensing process.