



**Supplementary Information
Oral Presentation**

**Presentation from
Erica Martin**

In the Matter of the

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

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

Commission Public Hearing

March 2 to 6, 2020

**Renseignements supplémentaires
Exposé oral**

**Présentation d'
Erica Martin**

À l'égard de

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

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

Audience publique de la Commission

Du 2 au 6 mars 2020

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laissée en blanc*

CNSC: The Obligation to Protect our Kids



By Erica Martin

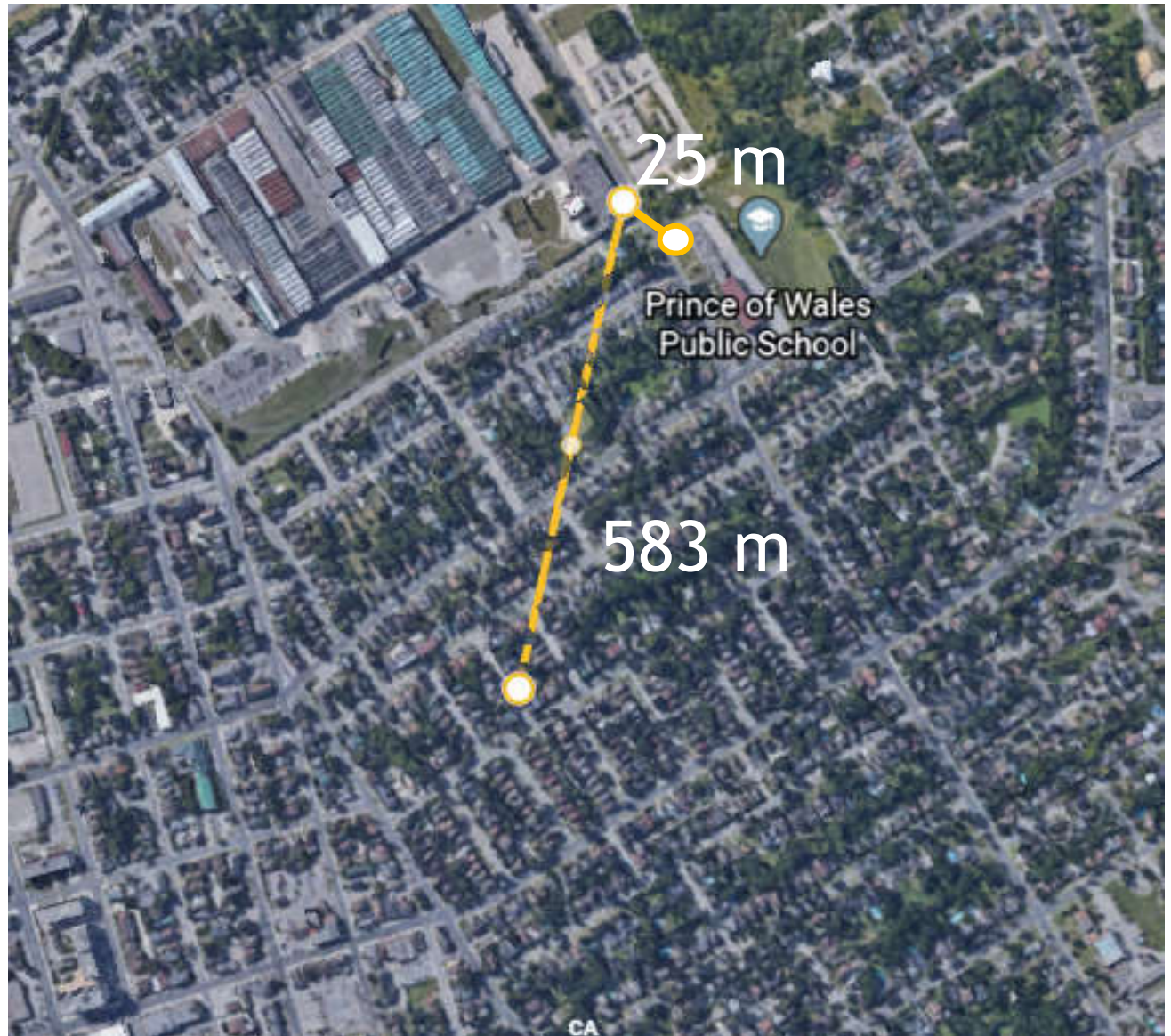
March 2020

From BWXT
to my house:

→ 583 m

From BWXT
to my kids'
school:

→ 25 m





25 m
583 m

Industrial factories that pose even potential health risks have **no place in residential areas** like the one where BWXT is located, and certainly **not close to vulnerable populations like children.**



Radiation exposure standards are developed for adults, not for kids.



Radiation is more dangerous for kids

- Children grow quickly.
- Toddlers love playing in the dirt and putting things into their mouths.
- Many Prince of Wales students spend ten years at this school.
- The effects of radiation take years to develop.

Sources

- https://www.radiologyinfo.org/en/info.cfm?pg=safety-hiw_03
- Canadian Council of Ministers of the Environment, “Canadian Soil Quality Guidelines for Uranium: Environmental and Human Health Scientific Supporting Document”, 2007, page 121, Estimated Total Daily Uranium Intake by Age Class for the Canadian General Population. Note: CCME guidelines are quoted in BWXT’s own Compliance Report.

If BWXT is allowed to make uranium pellets in Peterborough,

children will be the ones most at risk.

You, the CNSC, have

an obligation to protect our children

by not allowing BWXT to produce uranium pellets across the street from a public school.

If BWXT is allowed to produce pellets in Peterborough, greater quantities of uranium dust will be released into the air.

	Stack Description	Emission Contaminant	Total Number of Samples	Regulatory Release Limit (# Samples Exceeding Limit)	Highest Value Recorded (µg/m3)	Average Value Recorded (µg/m3)	Total Discharge (g)
Peterborough	R2 Decan	Uranium	44	Action Level: 1 µg/m3 (0)	0.012	0.001	0.004
	North	Beryllium	42	Ministry of Environment Limit: 0.01 µg Be/m3 (0)	0.001	0.000	N/A
	South	Beryllium	39	Ministry of Environment Limit: 0.01 µg Be/m3 (0)	0.001	0.000	N/A
	Acid	Beryllium	35	Ministry of Environment Limit: 0.01 µg Be/m3 (0)	0.002	0.000	N/A
Toronto	Rotoclone	Uranium	251	Action Level: 1 µg/m3 (0)	0.355	0.009	2.18
	6H-68	Uranium	251	Action Level: 1 µg/m3 (0)	0.145	0.004	3.49
	4H-48	Uranium	251	Action Level: 1 µg/m3 (0)	0.500	0.006	1.32
	Furnace #1	Uranium	251	Action Level: 1 µg/m3 (0)	0.105	0.011	1.24*
	Furnace #2/4	Uranium	251	Action Level: 1 µg/m3 (0)	0.809	0.076	1.16*
	Furnace #5/6	Uranium	251	Action Level: 1 µg/m3 (0)	0.132	0.011	1.41*

Table 18: Summary of Hazardous Substance Releases to Air at Exhaust Stack

Uranium dust
will land on the
playground of an
elementary school.

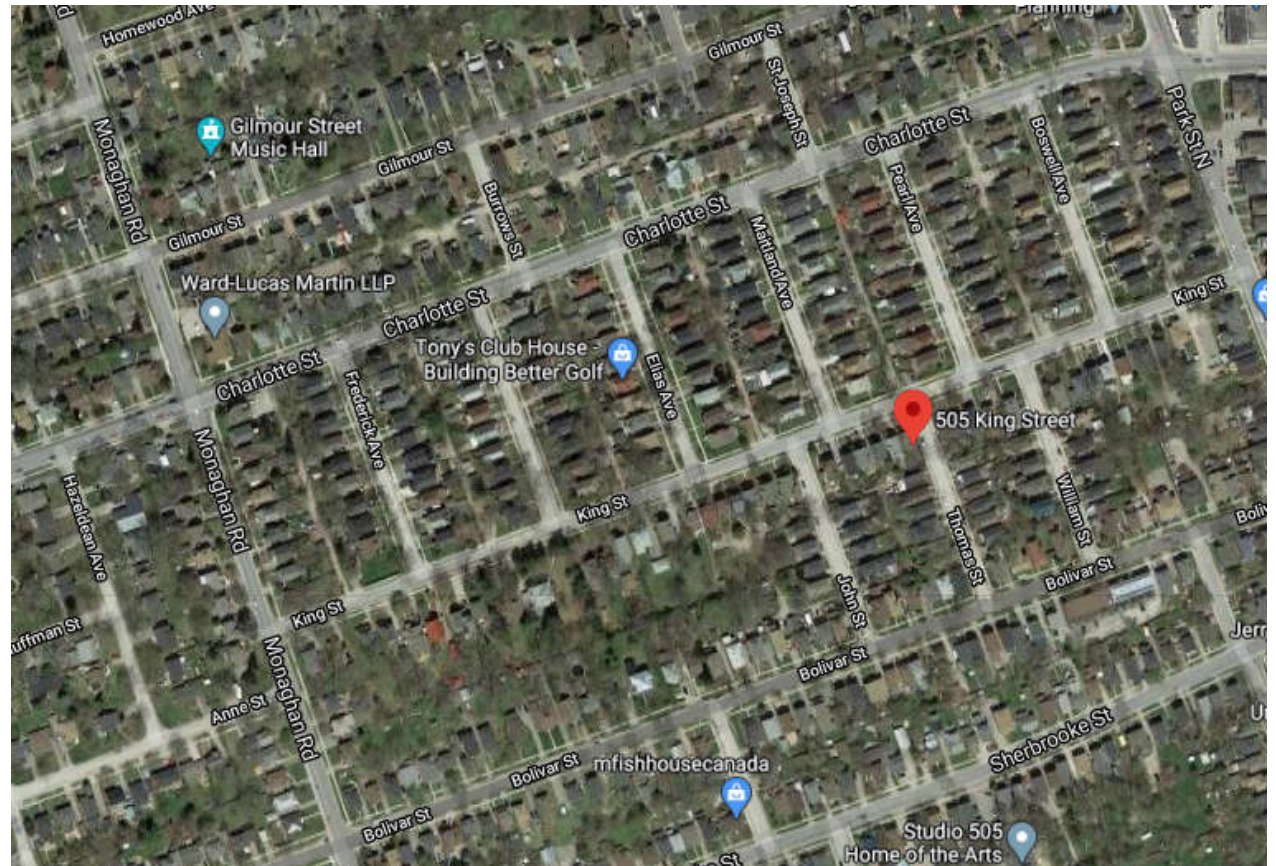
Uranium dust
will land in our
vegetable gardens.

This is not fair to
our children.



This is my neighbourhood. It is NOT an industrial neighbourhood.

It is a residential neighbourhood with one antiquated industrial facility:
the BWXT site.





What was ok in 1892 is not ok today.

Industrial facilities are no longer allowed to be built in residential neighbourhoods.

Significant Opposition to this Proposal

- ❖ weekly demonstrations against the proposal
- ❖ anti-pelleting information meetings filled beyond capacity
- ❖ extra day added to CNSC hearings because of the large numbers of anti-pelleting interventions

NO SOCIAL LICENSE FOR THIS PROPOSAL
=
Peterborough residents do not want pelleting here



Precautionary principle:

we should go out of our way to protect human health because the consequences are so great if we do not

10 years is too long a period for this license

Why this matters



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1. NOT allow BWXT to produce uranium pellets in Peterborough.
2. Use a third-party reputable organization to determine through an environmental assessment - and make public - the health and safety concerns from the BWXT proposed license renewal.
3. Use a third-party reputable organization to determine through a community impact analysis - and make public - the decline in property values and municipal tax base if BWXT is granted this license.
4. NOT consider a ten-year period for this license. If the license is granted, it should be for one year only, to align with the precautionary principle and to allow for mitigation of serious human health and environmental harms.