



Oral presentation

Exposé oral

Written submission from the MRC Pontiac

Mémoire de la MRC de Pontiac

In the Matter of the

À l'égard des

Canadian Nuclear Laboratories (CNL)

Laboratoires Nucléaires Canadiens (LNC)

Application from the CNL to amend its Chalk River Laboratories site licence to authorize the construction of a near surface disposal facility

Demande des LNC visant à modifier le permis du site des Laboratoires de Chalk River pour autoriser la construction d'une installation de gestion des déchets près de la surface

**Commission Public Hearing
Part 2**

**Audience publique de la Commission
Partie 2**

May and June 2022

Mai et juin 2022

Submission to Canadian Nuclear Safety Commission (CNSC) Concerning the licensing of the Near Surface Disposal Facility (NSDF) proposed by CNL

By Warden Jane Toller, MRC Pontiac

Introduction

As the Warden, I represent Pontiac County with its eighteen municipalities and a population of 14,000 residents. The MRC Pontiac is a large agricultural and forested region in southwestern Québec, in the heart of the province's deciduous and mixed forests. The Kichi Sibi or Ottawa River and its tributaries form vital natural, cultural, and recreational aspects of our communities. Also, it is a source of drinking water for many Pontiac communities.

MRC Resolution

We are unilaterally against the Near Surface Disposal Facility (NSDF) proposed by CNL Chalk River. On December 15, 2021, our mayors unanimously passed the following resolution:

Considering Motion 161-2021 adopted by the Council of the Municipality of Sheenboro; Considering the importance of the issue of the Canadian Nuclear Laboratories (CNL) near surface nuclear disposal facility;

It was moved by Regional Councillor and pro-warden Ms. Sandra Armstrong and resolved that the Council of the MRC urge the federal government to move the proposed near surface nuclear disposal facility to a site well away from the Ottawa River and to have the Director General send an accompanying letter addressed to the federal Minister of Natural Resources providing a summary of the rationale for requesting this action by the federal government. CARRIED UNANIMOUSLY

This resolution states that the NSDF is located too close to the Kichi Sibi/Ottawa River. The nature of the site with creeks flowing into the river, and the region's susceptibility to earthquakes, tornadoes, and now heavy rains due to climate change, render the site and the mound unacceptable to us. Furthermore, residents and officials are concerned about the long living radionuclides and hazardous materials to be stored in the mound and if they leach in the river, it will impact the health of our communities.

Lack of consultation

CNL failed to consult the Mayors and Warden of Pontiac County on the NSDF and whether we agreed to the concept of the mound and the location near the river. CNL visited several communities and shared information about it. By then it was *fait accompli*. Despite the nature (building near a river) and magnitude (tons of waste) of this project along with a new type of disposal facility proposed for the Ottawa Valley, **we were not consulted.**

Health

The Pontiac County has the worst health in any of Quebec's counties where residents experience cancer, respiratory and heart disease, and diabetes. SECOHealth confirmed this fact about Pontiac County. Residents' health is already compromised and the NSDF, a flawed nuclear waste disposal facility, to be situated 1 km from the river could further jeopardize the health of Pontiac residents. The Kichi Sibi/Ottawa River and its tributaries flow through our communities providing drinking water, groundwater for wells, recreation (including swimming) and tourism.

Destination Pontiac

During the COVID pandemic, new people or former residents moved to Pontiac County for its unharried lifestyle, beautiful scenery, and friendly communities. We launched our Destination Pontiac (<https://destinationpontiac.ca/en>) a promotional campaign showing people why they should move to Pontiac County. Many of the photos in our campaign show the Kichi Sibi/Ottawa River. Having a NSDF upstream that takes in waste from across the country and is located 1 km from the river is a deterrent to attracting families to the Pontiac. For the past five years, letters to the editors in our local papers (Pontiac Equity and Pontiac Journal) have expressed their serious concerns and opposition to the NSDF.

Integrated Wastes from other facilities and Absence of Consultation, Again

Like other organizations and the City of Ottawa, I am opposed to the importation and transportation of nuclear waste on highways from Manitoba, Ontario, and Quebec to CNL Chalk River. Why should a site on the Ottawa River become Canada's nuclear waste dumping ground? Furthermore, CNL unilaterally made this decision with no engagement and consultation with Indigenous communities, local governments, and citizens. **There was no consultation with my predecessor, the Mayors of the Pontiac, or our citizens on this matter.**

This GoCo model for CNL should not allow CNL to circumvent regulatory and policy guidelines for public consultation. As per a federal government website, <https://open.canada.ca/en/content/principles-and-guidelines>, the principles of public consultation are clear:

- Public engagement
- Transparent
- Relevant
- Inclusive
- Accountable and
- Adaptable.

CNL did not adhere to these steps concerning site location, waste facility model and the integrated waste strategy.

It is dispiriting and disillusioning that our federal government has cut the cheque and handed over the responsibilities for nuclear waste management to a consortium that makes decisions unfettered by the democratic input of citizens and their elected officials. Furthermore, this void of an independent agency to determine Canada's nuclear waste policy that meets international standards is enabling this ill-suited NSDF proposal to go forward for review by the Canadian Nuclear Safety Commission (CNSC).

Until that happens, I recommend that the Canadian Nuclear Safety Commission (CNSC) does not approve the NSDF. **As an elected official, I ask you as a regulatory body to listen and be accountable to the people "living downstream," the environment and not a consortium of a Canadian and two American companies.**