



Oral presentation

Submission from Environment Haliburton!

In the Matter of the

Canadian Nuclear Laboratories

Application for the renewal of the Nuclear
Research and Test Establishment Operating
Licence for the Chalk River Laboratories

Commission Public Hearing

January 23-25, 2018

Exposé oral

Mémoire de Environment Haliburton!

À l'égard des

Les Laboratoires Nucléaires Canadiens

Demande de renouvellement du permis
d'exploitation d'établissement de recherche
et d'essais nucléaires pour les Laboratoires
de Chalk River

Audience publique de la Commission

23-25 janvier 2018



December 11, 2017

Canadian Nuclear Safety Commission

cnsc.interventions.ccsn@canada.ca

Environment Haliburton! is a non-governmental organization based in Haliburton County. We take a comprehensive view of environmental issues, encourage positive initiatives, and oppose those that could have an adverse effect on the environment. Our activity is focused within the settler-imposed limits of the County. However, we recognize that everything is related, that we are inter-dependent, and inter-responsible to the life outside those human-imposed geographical limits. The headwaters of the York River Watershed are within Haliburton County. That watershed delivers water to the Ottawa River. We believe we share responsibility with all those whose land feeds the Ottawa River to protect it.

Environment Haliburton! would like to make an oral presentation at the public hearings being held in Pembroke, Ontario, in January 2018.

We oppose the application for a ten-year extension of the licence affecting the Chalk River Laboratories which was originally issued to the Atomic Energy of Canada Limited (AECL), and is currently held by Canadian Nuclear Laboratories (CNL) .

Although AECL is a Canadian federal Crown corporation, we understand that it has delegated all day-to-day operations of AECL sites to the “site operating company”, Canadian Nuclear Laboratories (CNL) under a Government-Owned, Contractor-Operated model. Ownership of CNL has been transferred from AECL to Canadian National Energy Alliance, a consortium of five private, for-profit, international corporations. However, we understand that AECL retains ownership of the physical and intellectual property assets and its liabilities. (<http://www.cnl.ca/en/home/news-and-publications/news-releases/2014/141030.aspx>)

It is the physical assets affected by this licence that are of primary concern to Environment Haliburton! We have experience in Haliburton County with private, for-profit corporations leaving liabilities in their wake. Private, for-profit corporations are created to make a profit for shareholders. Shareholders are far removed from the physical spaces where the commercial activity occurs. They expect the employees of those corporations to maximize the value of their investment. They assess performance by looking at recent financial records. They may be unaware, and unconcerned, with negative effects that do not affect the profits.

The applicant is operating a business that has enormous potential for harm to the physical assets on which it operates, harm which could continue for thousands of years.

Environment Haliburton! is very concerned about the applicant's proposed 'solution' for the radioactive waste on the Chalk River site – the so-called 'Near Surface Disposal Facility'. Alternative solutions that could minimize the potential harm may not be pursued because they are not financially feasible in the short term.

A new licence should require that the handling of radioactive and toxic materials must be such that when new technology develops and provides safer solutions, future generations can recover the stored materials and treat them accordingly.

A new licence should require the licensee, in all its activities at the Chalk River site, to adhere to policy guidelines based on the precautionary principle. The Anishinabek Nation and the Iroquois Caucus in their *Joint Declaration on the Transportation and Abandonment of Radioactive Wastes* have described how this would apply to handling the radioactive waste: no abandonment, monitored and retrievable storage, better containment and more packaging, located away from major water bodies, and no imports or exports.

Finally, Environment Haliburton! is concerned about the current capacity of AECL to effectively oversee the contractual obligations of the consortium.

For these reasons, we strongly urge the Commission to restrict the duration of the extension of the licence to the shortest possible period. The re-licensing process is the only opportunity for you, representing the public interest, to maintain some control over this private sector activity. It should occur as frequently as possible.

Sincerely,

A handwritten signature in black ink that reads "Carolynn Coburn". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Carolynn Coburn
President, Environment Haliburton!