



CMD 26-M13.15

Date: 2026-04-11

**Written Submission from
Jessica Rowland**

**Mémoire de
Jessica Rowland**

In the matter of the

À l'égard de la

**Mid-term update from BWXT Nuclear
Energy Canada Inc. on licensed activities
at its Toronto and Peterborough facilities**

**Mise à jour de mi-parcours sur les
activités autorisées de BWXT Nuclear
Energy Canada Inc. à ses installations de
Toronto et de Peterborough**

Commission Meeting

Réunion de la Commission

May 2026

Mai 2026

CNSC Intervention Letter: Re Pelleting in Peterborough.

April 11th, 2026

BWXT Intervention Letter: Dear CNSC and All concerned.

BWXT, an American multinational heavily involved in the nuclear weapons industry applied to expand its nuclear license to include the processing of uranium dioxide powder into pellets in downtown Peterborough and just 25m from Prince of Wales Public School. There were a record number of interventions *against* this operation, but unfortunately, nothing has changed, the company has continued operations, putting residents of Peterborough and the community at risk of serious intergenerational health damage. Unfortunately, money and power are more powerful than the democratic voices of concerned citizens. What about the common good? Dangerous industrial processes that cause contamination of the surrounding area belong in Industrial parks, not in the centre of cities. American multinational companies should not be allowed to make money by compromising the health of Canadians, especially the most vulnerable, children and families. People living and working nearby to the location of BWXT have clearly said NO to having their health, well-being, safety and the health of future generations compromised, and these people who have clearly said NO to BWXT and Uranium fuel pelleting processes and other toxic process in their neighbourhood are currently clearly having their health compromised for the profits of an American multinational. People who have said NO are clearly being assaulted by the imposition of radioactive materials into their living and working spaces and into their bodies. The people said NO and the incursion still persists, permitted by the CNSC looking the other way and choosing money and power over the health and well-being of local people and children. Shame!

This is a serious violation of our human right to health, safety and security of the person.

Nuclear weapons proliferation is a danger to the very existence of peace and health on the planet, and any company involved in production of nuclear weapons does not belong in our, or any community.

An American Multi-National company has no place in our community. America has special regulations that force companies to pay for the toxic cleanup of their toxic waste and emissions in the environment. I think this American company is just here to exploit our community and force the residents of Peterborough to not only bear the toxic burden of the pollution in their bodies and future generations, in the grief and expense of those who will get ill from cancer as a result, but also financially through taxes for this company's clean up. These tax dollars could be better used to improve the community, the hospitals, the education system, NOT to clean up the toxic waste purposely imposed on the local environment for profit by an American company. An American company that is heavily involved in nuclear weapons manufacturing has NO PLACE in our community. Especially now. This is a national security risk. The CNSC is irresponsible for allowing this company and facility to function in the middle of a city,

causing cancer for local residents-there is a higher than normal rate of cancer diagnoses for teachers teaching in the school next door to the factory. What about the children? Is there a fund for compensation for health care of those affected, for their families? This is a devastating and clear lack of ethics on the part of the CNSC. There is nothing safe about the Canadian Nuclear "Safety" Commission.

Nuclear power is what makes Ontario Power notoriously expensive and unaffordable for most people on an average income. The cost of living is unaffordable for ordinary people and those living in poverty – this also contributes to the homelessness crisis disproportionately affecting elderly people and those with disabilities. There are a lot of green energy generation alternatives other than nuclear power - which is not actually green - the legacy of radioactive waste affecting generations and the increased risk of terrorism and war creating a devastating impact if nuclear facilities are attacked or compromised makes nuclear electricity generation a stupid, dangerous choice - solar and other alternatives are much safer, and the technology is only improving. Our communities are becoming more dangerous, toxic, and risky due to the risks that nuclear power plants pose to water resources, surrounding communities and lack of evacuation plans in the case of an emergency.

Nuclear and uranium pellet operations do not belong in the center of cities. I suspect this is a sort of science experiment they are doing on the local populations which is unconscionable and simply irresponsible, if not downright evil. CNSC does not stand for safety of citizens, it stands for profit and power.

The only CNSC Commissioner with biological expertise, a medical doctor, radiologist and professor of public health, (in a panel of engineers, and industry insiders) said: "Moving the pelleting operations, adding radiation doses and UO₂ air and effluent emissions in a site which has an adjacent vulnerable population, is not acting in an abundance of precaution." Sandor Demeter - CNSC member. (He said it was not justified. Unfortunately, he is no longer a commissioner.) This demonstrates that the CNSC does not operate with an abundance of caution as is their mandate, and seems to get rid of, or silence those who speak against what those with money and power want - to the detriment of public health and safety.

Why are there very few commissioners on the regulatory body (CNSC) who have expertise in the biological effects and possible health effects of radiation on the surrounding communities? Because this is about corporations with power making money and weapons, not about the common good or even in consideration of the common good. This is a callous and obvious disregard for public safety.

Since the hearings, the CNSC has been censured by the International Atomic Energy Association for not living up to international standards in relation to things like public doses and siting and justification. see:

<https://concernedcitizens.net/2020/03/07/international-peer-review-finds-deficiencies-in-canadas-nuclear-safety-framework/>

If all the pelleting comes to Peterborough, all the uranium normally stored and processed in Toronto would be stored in Peterborough. Up to 1500 tons of uranium could be moving through our streets, next to our waterways and stored onsite in our downtown core. This is an accident waiting to happen.

Unfortunately, accidents have already happened, during the first half of this license period, pipes cracked letting water contaminated with Be and once with uranium that was meant for the sewer to seep through the concrete into the ground. There are also numerous mishaps caused by entropy, storms, human error in both facilities over the years. These are called "events". Neither the big ice storm last year nor the derecho were mentioned in BWXT's midterm intervention. Every time it rains, the water flows off the toxic GE Complex land and into Little Lake. Our toxic storm water ends up in Little Lake. Little lake is still a swimming area - is it tested for the contaminants coming from GE to ensure the safety of swimmers? Or just for E-coli?

Even without accidents, the emissions into the air near the facility are putting local children and residents at risk. In 2016, the air concentration of uranium was measured at the perimeter of the factory in Toronto at 390 X's background levels. Uranium powder can quickly become airborne. This should not be done next to a school. (The Ontario Ambient Air Quality Standard for uranium in air is 0.03 µg/meter cubed but that is at least 300 x's natural background) In 2014, one of the CNSC's IEMP samples measuring uranium concentrations in the air at Prince of Wales School was 0.0013µg/m cubed! That is at least 13x's background.

Although the CNSC says it does calculations to make sure toddlers are protected from radiation doses, there is a lot of evidence that these calculations are inadequate to protect, especially little girls and fetuses. Gender is an issue.

see:

https://unidir.org/wp-content/uploads/2024/11/Gender_and_ionizing_radiation_web.pdf

<https://esmed.org/lifecycle-radiation-protection-ensuring-future-generations/>

<https://blog.uccs.org/chanese-forte/why-federal-radiation-regulations-can-no-longer-ignore-women-and-girls/> Union of Concerned Scientists

As a resident of Peterborough, and a Canadian, I am deeply concerned about the decision to allow a toxic industrial site to operate in the centre of a city, in the middle of a residential area and beside a school. There is a reason there are industrial areas that are usually intentionally placed far away from residential areas. This site (the old GE site) is extremely contaminated already and is soon going to be "cleaned up" and many of the buildings demolished, which is going to create even more risks for the surrounding population. This impending demolition is an opportunity to relocate ALL

risky, toxic and polluting industrial processes away from the downtown of a thriving city and into special secluded and protected industrial sites where they belong and can be properly monitored. As this clean up is already scheduled, the ENTIRE GE SITE should be cleaned up, including what is currently BWXT. The impacts of the cleanup and the mitigating measures required to protect the community during the clean up of the toxins on this industrial site in the centre of the city should only happen once. Relocating and removing BWXT from this area NOW makes sense and making new laws to protect citizens by preventing industrial parks and polluting industries in the middle of town need to be made.

This factory is on the GE Complex lands. Recently more people have become aware of just how contaminated this site, next to a school and in a residential area, is because GE is proposing to demolish 80% of its contaminated buildings raising concerns about toxic dust--especially on the children nearby. There are plumes of PCB's and TCE's under the factory. We are talking about asbestos, lead, other heavy metals, Be, etc. et. Even without any productive industry, considerable vinyl chloride, and TCE's are emitted into the air just from airstripping the toxic plumes of trichloroethylene in the ground of the GE Complex Lands.

This is a Brownfield and would be a Superfund site in the US, where the feds would carefully oversee the demolition, with all levels of government involved and the GE being held financially responsible for the clean-up. Sadly, all of Little Lake going down to Rice Lake is on Canada's federal contaminated sites inventory-- amongst other areas of town.

The legacy of irresponsible management of operations at this formerly GE industrial facility in the centre of the city of Peterborough has been well documented and testified to by survivors and families of those who have worked there. This industrial area has to be cleaned up and closed as an industrial facility as now it is in the center of town, which is no place for any polluting industrial productions or toxic activities.

What role should CNSC play in overseeing the demolitions? Should BWXT have to pay for this? Beryllium and Uranium was processed in some of the buildings slated for demolition.

Allowing any more contaminants to emanate from an already terribly toxic site next to a school and residential area is irresponsible (on the part of the city and CNSC) and bad city planning, demonstrating lack of care or concern for public health and community safety. To allow BWXT to continue to operate a dangerous facility in a residential area and near a school is against the democratic process, violates the rights of citizens and their human rights, and demonstrates callous and reckless disregard for public safety and the democratic process in favour of big money, big American, multinational, nuclear weapons business. Nuclear is the reason Ontario electricity is unaffordably expensive, it's time to transition to truly green alternatives and move away from dangerous industry for power generation that creates toxic waste that lasts longer than many generations...nuclear waste storage is also an ongoing safety risk and problem.

CNSC allowed BWXT to substantially decrease the funds set aside for decommissioning during the first half of this license, this is definitely NOT in the public interest and is clearly a very unwise and dangerous decision. This American Company is going to be making Canadian taxpayers foot the bill with their tax dollars that should be going to healthcare, social services, education, and more, to clean up after them once they move on, leaving their toxic legacy behind them. They need to leave now so the entire GE site can be cleaned up and detoxified and transitioned to another use.

This former industrial park which is now in the centre of the city should be demolished and turned into a commercial area or a park, it's in an ideal central location for commercial development to make the city more walkable and accessible. Or, sell the formerly GE land to a developer to build a condo or mixed commercial development there.

Is there an independent monitoring agency overseeing this facility BWXT and all of its operations? How are citizens involved? Are any people who live or work close to this facility involved or allowed to have a say in the existence of a facility putting their health at risk in their neighbourhood? Citizens have said NO, so they are clearly not being listened to.

At the 2020 Hearings, BWXT said that the estimated radiation dose to public would be 10µSv for the combined operations of pelleting and fuel bundling, if BWXT was allowed to expand to include pelleting.

Yet, looking at the chart below from BWXT's midterm update, we see that the estimated radiation dose to the public for Toronto alone is over 10 times as high as was estimated by BWXT during the Hearings in 2020 for the combined operations.

Table 14: Estimated Radiation Doses to Members of the Public

Year	Estimated Annual Public Dose (µSv)	% of Public Dose Limit (1,000 µSv = 1 mSv)
2025	109.1	10.9%
2024	137.8	13.8%
2023	40.2	4%
2022	17.3	2%
2021	17.3	2%

BWXT says the radiation dose in Toronto is largely because of uranium stored on site--from external gamma radiation. BWXT in Toronto is "only" allowed to have 700 metric tons on site while BWXT in Peterborough is allowed to have 1500 tons. There is a lot

more Uranium onsite in Peterborough than in Toronto and it will be important that the information is made public and transparent what the radiation dose to the public actually is going to be here in Peterborough once " the methodology for assessing public dose may be revised in conjunction with BWXT NEC Toronto to ensure alignment across both facilities. These updates are planned to be implemented in 2026 but "are not expected to result in any notable change to the estimated doses for Peterborough, given the historically negligible results observed to date."

Since the hearings, the CNSC has been censured by the International Atomic Energy Association for not living up to international standards in relation to things like public doses and siting and justification. see:
<https://concernedcitizens.net/2020/03/07/international-peer-review-finds-deficiencies-in-canadas-nuclear-safety-framework/>

There needs to be third party independent monitoring of these kinds of facilities.

Risks include but are not limited to:

Industrial production using dangerously flammable and substances that significantly damage public health should not be placed in the centre of, or even near to, a residential area and a school.

Powdered uranium is flammable. Is it worth putting children at risk for the convenience of the company? Are fire services prepared? Are parents prepared?

A fuel tank of the type of gas/fuel required to manufacture fuel pellets in the centre of a city beside a school is an accident waiting to happen and should not be allowed.

All the low-level radioactive waste stored onsite in Peterborough? What are the health effects and the risks?

A heavy industrial processing line in downtown Peterborough, on terribly polluted land next to a school, is not a good idea!

Also, transportation of these highly dangerous substances through town by truck or train causes an unnecessary danger to the public.

There has been a high rate of teachers getting cancer at the school next door to BWXT. Have health studies been done on the surrounding populations over the years, including students and the teachers at the school, to assess if there is an increased impact of the health of those close to the plant?

The science around uranium's effects on cells and tissue has accumulated since the last hearing. For stochastic (chance) events like cancer and genetic mutations, there is no threshold. It can be caused by a single alpha particle passing through a cell. (WHO)

The effect of pollutants, including internally emitting radionuclides and external radiation doses are cumulative throughout a lifetime.

What kind of compensation and insurance \$ is available if an accident were to happen?

What kind of compensation and insurance \$ is available if it is proven that the industry has damaged the health and lives of children and families in homes and the school nearby?

What kind of security and protection is provided in the case of vandalism or terrorism. Is there an evacuation plan in place in case of an "incident."

Are there safety plans in place in case of "events", spills or accidents that may happen at the facility for ALL residents living nearby, people working nearby and the school? How big of a zone does this cover? If this is not in place, the facility is irresponsible and should NOT be operating there.

Would the people profiting from the plant put their children in the school next door? I think they should be required to. Would the people profiting from the plant live next door to the facility? I think they should be required to.

If BWXT is allowed to continue in the former GE site, despite strong public opposition by local residents, one of the conditions should be that they should live next to the plant for the duration of the license and have their children or grandchildren in the school next door.

I request that BWXT NOT get a licence to do their work inside the city of Peterborough or Toronto or in any other city close to schools and residential areas anywhere. Move BWXT into an industrial park away from residential areas where it belongs and ensure rules are put in place to prevent such facilities from being placed in residential areas in future.

I am opposed to the manufacturing of uranium fuel pellets in Peterborough and Toronto. NO pelleting in Peterborough. Transition away from nuclear, it is not clean fuel, it is dangerous with long term risks and affects. It is also expensive and unaffordable.

The GE facility and site in Peterborough should be closed permanently to industrial use and transformed into a commercial, recreational or residential development. Previous companies that created contamination at the formerly GE site need to pay to clean up this contamination and eliminate its effects on animals, land, water the environment and people.

The city of Peterborough and the province needs to put laws in place preventing industrial operations in residential areas to protect the health of citizens.

Nuclear Power is unsafe and should be phased out. BWXT needs to be removed from residential areas in Toronto and Peterborough and properly monitored by a third party.

Thanks for considering and IMPLEMENTING my requests.

Close BWXT in Peterborough & Toronto. BWXT is not welcome here.

Sincerely,

Jessica Rowland

Peterborough, Ontario.