



CMD 26-M13.2

Date: 2026-03-04

**Written Submission from
Erica Martin**

**Mémoire de
Erica Martin**

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

March 3, 2026

To the Commissioners of the CNSC:

I have read all of the submissions that were made to the Canadian Nuclear Safety Commission in the public hearing held in Peterborough in March 2020. This hearing allowed members of my community to have their say about BWXT's plans to renew its license for another 10 years. This license would allow BWXT to continue processing nuclear fuel rods and repairing radioactive equipment in the heart of our city. The company also applied for permission to start producing nuclear fuel pellets at their facility, directly across the street from an elementary school.

I read 186 submissions, each written with passion and purpose. Many writers wondered how it could possibly make sense for nuclear processing to be allowed to take place in the middle of a residential neighbourhood and right across the street from an elementary school playground. The zoning for the facility has been grandfathered in, but the municipality would never grant such a permit if it were applied for now, in more enlightened times.

Other writers asked about the rising levels of uranium and beryllium contamination in the soil around the plant and worried about effects on their own and their children's health. They were scared for the current and future health of children whose school playground is a mere 25 metres away from the factory's active smokestack. Compared to adults, children face much greater risks from toxins. The writers wondered whether it was ethical to use children as the canaries in a carcinogenic coalmine. Still other writers mentioned the toxic burden that Peterborough citizens already face: PCBs and other carcinogens, left onsite by the factory's former owners, seep into our local lake, where residents boat and swim in the summer. They did not think it was fair that BWXT wanted to add to this toxic burden. Peterborough citizens face all the risks, they wrote, while the companies reap all of the benefits.

Notably, there was not even a single personal submission from anyone in Peterborough who supported the proposal. The (very few) submissions in support came, unsurprisingly, from pro-nuclear industry groups, for example the Canadian Nuclear Workers' Council. It is clear from this imbalance that there is no "social license" for this project to operate in the community. There is also little public trust in the Canadian Nuclear Safety Commission, a "kept" regulator whose close relationship with the nuclear industry prevents it from being able to independently govern that industry with any degree of objectivity.

Sadly, but not surprisingly, at the end of the hearing, the CNSC sided with its industry partner, BWXT. A ten-year license was granted for the company to process nuclear fuel rods, repair radioactive equipment and produce nuclear fuel pellets at the Peterborough facility.

Unusually for the CNSC, this decision was not unanimous. The commission member who dissented from the majority decision was Dr. Sandor Demeter, an associate professor in community health sciences at the University of Manitoba, who is an expert in clinical nuclear medicine and, interestingly, the only Commission member with a medical degree. Dr. Demeter said that the fact that BWXT would expose a vulnerable population – i.e. our community's children – to radiation and uranium dioxide emissions does not illustrate acting in an abundance of caution. I applaud Dr. Demeter for standing up for our kids, who deserve the chance to grow up without being subjected to this toxic legacy from BWXT.

Soon, we will approach the mid-point (5-year) review for this license. At this point, the CNSC and BWXT are required to update the public and each other about the supposed safety of the activities at the facility. Those of us who live in the area are still strongly opposed to BWXT's risky activities in our neighbourhood. Given the risks to our children's and our community's health, and given the company's location in a residential area and across the street from an elementary school, we still believe that it is unethical and unjustified for BWXT to conduct this activity here. We did not want it to happen here 10 years ago and we still do not want it now.

Social license to operate ("SLO") is defined as "ongoing acceptance or approval of an organization, project, or industry by local communities and stakeholders". It allows businesses to "operate with community support and reduced risk of conflict". Let me repeat: BWXT does NOT have a social license to operate in this community. Parents, teachers, businesspeople and citizens will continue to oppose this license until our community's children and residents are able to live and grow up in the kind of healthy city we all want and deserve – one without a nuclear facility in a residential neighbourhood and across the street from an elementary school.

Thank you for your attention. I look forward to hearing a response to my concerns.

Sincerely,

Erica Martin