

Open Letter To:

Justin Trudeau, Minister of Intergovernmental Affairs and Youth  
Carolyn Bennett, Minister of Crown-Indigenous Relations and Northern Affairs  
James Carr, Minister of Natural Resources  
Catherine McKenna, Minister of Environment and Climate Change

Dear Justin Trudeau, Carolyn Bennett, James Carr and Catherine McKenna,

We learned recently that the Canadian Nuclear Safety Commission is proposing massive [changes to the license for the Chalk River Laboratories](#), site of a proposed radioactive [megadump](#), including removal of 28 conditions of the license itself and removal of several hundred “compliance verification criteria”. **We are appalled at this radical move toward deregulation** to benefit the multinational consortium, Canadian National Energy Alliance, whose Canadian partner, SNC Lavalin, is currently debarred from the World Bank for ten years and facing criminal charges in Canada for fraud, bribery and corruption.

Our two groups along with First Nations, scientists, municipalities, individuals, and the Quebec Ministry of Environment and Sustainable Development are very concerned about the consortium’s plan to emplace and eventually abandon one million cubic meters of radioactive wastes in a giant mound on the side of a hill, next to a swamp, less than one kilometer from the Ottawa River at Chalk River, Ontario in unceded traditional Algonquin territory. As we and many others have stated, in [comments](#) on the environmental assessment for this misleadingly named “*Near Surface*” *Disposal Facility*, the proposed giant mound flouts international guidance, would exceed public dose limits for radiation for 100,000+ years and would contaminate the Ottawa River, Canada’s most recently designated Heritage River, which provides drinking water for millions of Canadians downstream all the way to Montreal.

We and many others believe that the Canadian Nuclear Safety Commission should not have decision-making authority for the environmental assessment of this or any other nuclear project. We concur with the Expert Panel on environmental assessment reform, the [final report](#) of which reflects the widely held view that CNSC is a captured regulator with no independence from the industry it regulates. We note that House of Commons [e-petition 1220](#) requesting suspension of the environmental assessment for the Chalk River megadump and replacement of CNSC as decision maker for nuclear projects has been signed by more than 2,000 Canadians from coast to coast to coast in all ten provinces and three territories.

We are also very concerned by the [Auditor General report](#) that Atomic Energy of Canada Limited, owner of the Chalk River Laboratories and other federal nuclear facilities, has experienced a “significant deficiency in board renewal”, has “not met its statutory obligation to hold public meetings” since 2009, and lacks “a formal, systematic process for monitoring and reporting on risks” among its facilities.

Legal experts we have consulted have stated that CNSC’s proposed changes to the Chalk River site license would greatly reduce CNSC oversight and render important safety requirements unenforceable. For example, the following license conditions are among those planned for removal:

- **4.2 New Nuclear Facilities:** *The licensee shall only carry out construction and/or operation activities of any new nuclear facility at the CRL site with the prior approval of the Commission. [GONE!]*
- **4.4 Nuclear Facilities Undergoing Decommissioning Activities.** *The licensee shall only decommission a nuclear facility, or any part thereof, at the CRL site in accordance with documented decommissioning plan(s) and procedures, and with the prior approval of the Commission to proceed with the decommissioning. [GONE!]*
- **12.3 Nuclear Legacy Liabilities** *The licensee shall ensure that nuclear legacy liabilities at the CRL site are addressed. [GONE!]*

We believe this radical move towards deregulation must be stopped immediately. CNSC’s proposal appears to confirm the widely held view that Canada’s nuclear regulator is more interested in supporting the nuclear industry than in protecting health and the environment, its primary mandate under the *Nuclear Safety and Control Act*.

The Government of Canada urgently needs to overhaul nuclear governance in this country to ensure responsible handling of radioactive waste. Consultations with the public and First Nations must be an essential part of this process.

Yours sincerely,

Lynn Jones, [Concerned Citizens of Renfrew County and Area](#)  
Johanna Echlin, [Old Fort William \(Quebec\) Cottagers' Association](#)

cc

Perry Bellgarde, Chief of the Assembly of First Nations  
Verna Polson, Grand Chief, Algonquin Anishinabeg Nation Tribal Council  
Kirby Whiteduck, Chief, Algonquins of Pikwakanagan First Nation  
Jean Guy Whiteduck, Chief Kitigan Zibi Anishinabeg  
Patrick Madahbee, Grand Chief of the Anishinabek Nation  
Joe Norton, Grand Chief, Mohawk Council of Kahnawake, on behalf of the Iroquois Caucus  
Margaret Froh, President, Metis Nation of Ontario  
Michael Binder, President, Canadian Nuclear Safety Commission  
Ginette Petitpas Taylor, Minister of Health  
Kirsty Duncan, Minister of Science  
Mélanie Joly, Minister of Canadian Heritage  
Mona Nemer, Chief Science Advisor  
Elizabeth May, Green Party Leader  
Martine Ouellet, Bloc Quebecois Leader  
Jagmeet Singh, NDP Leader  
Andrew Scheer, Conservative Party Leader  
Monique Pauze, Bloc Environment Critic  
Linda Duncan, NDP Environment Critic  
Richard Cannings, MP for South Okanagan — West Kootenay  
Ed Fast, Conservative Environment Critic

Stéphane Bergeron, MNA for Verchères  
David McGuinty, MP for Ottawa South  
Greg Fergus, MP for Hull-Aylmer  
Will Amos, MP for Pontiac  
Karen McKrimmon, MP for Kanata-Carleton  
Cheryl Gallant, MP for Renfrew-Nipissing-Pembroke  
Jim Watson, Mayor of Ottawa  
Valérie Plante, Mayor of Montreal  
Isabelle Melançon, Quebec Environment Minister  
Sylvain Gaudreault, Environment Critic, Quebec National Assembly  
Sylvain Rochon, Natural Resources Critic, Quebec National Assembly  
Marc Demers, Mayor of Laval  
Maxime Pedneaud-Jobin, Mayor of Gatineau  
Bob Sweet, Mayor of Petawawa  
Joan Loughheed, Mayor of Deep River  
Mike LeMay, Mayor of Pembroke  
Kathleen Wynne, Premier of Ontario  
Phillippe Couillard, Premier of Quebec  
Jennifer Murphy, Warden of Renfrew County  
Jane Toller, Warden of Pontiac County  
Chris Ballard, Ontario Minister of Environment and Climate Change  
Kathryn McGarry, Ontario Minister of Natural Resources and Forestry  
Julie Gelfand, Commissioner of Environment and Sustainable Development