



**Written submission from the
David Suzuki Foundation**

**Mémoire de la
Fondation David Suzuki**

In the Matter of

À l'égard de

**Ontario Power Generation Inc.,
Pickering Nuclear Generating Station**

**Ontario Power Generation Inc.,
centrale nucléaire de Pickering**

Request for a ten-year renewal of its Nuclear
Power Reactor Operating Licence for the
Pickering Nuclear Generating Station

Demande de renouvellement, pour une période
de dix ans, de son permis d'exploitation d'un
réacteur nucléaire de puissance à la centrale
nucléaire de Pickering

Commission Public Hearing – Part 2

**Audience publique de la Commission –
Partie 2**

June 2018

Juin 2018

May 2, 2018

Senior Tribunal Officer, Secretariat

Canadian Nuclear Safety Commission 280 Slater Street, P.O. Box 1046, Station B

Ottawa, ON K1P 5S9

To Whom It May Concern,

Re: Renewal of operating licence for Pickering Nuclear Generating Station Ref. 2018-H-03

This letter is sent on behalf of the David Suzuki Foundation.

We are writing to express our opposition to the request from Ontario Power Generation to renew its licence to operate the Pickering Nuclear Generating Station.

We have several concerns.

First, nuclear power is costly and does not represent good value for Ontario electricity users. Paul Hawken's important new book, *Drawdown*, states: "While the cost of virtually every other form of energy has gone down over time, a nuclear power plant's is four to eight times higher than it was four decades ago." And it concludes: "Onshore wind is a quarter of the cost of nuclear power."

In her 2018 report, *Making Connections: Straight Talk About Electricity in Ontario*, the province's Environmental Commissioner writes: "Going forward, nuclear costs will rise and solar and wind power costs will fall."

Second, we have concerns about safety. Pickering is the country's oldest nuclear generating station and its design is now considered out of date. Notwithstanding the operator's precautions, the possibility of a mishap or intentional destruction is frighteningly real. Given Pickering's proximity to large population centres — including Toronto, Mississauga, Hamilton and Barrie — the results of a major incident could be catastrophic. We know that other advanced industrial nations have suffered severe nuclear accidents, Fukushima being the most recent. Ontario is by no means immune. The City of Toronto and Durham Region just reiterated their support for strengthening nuclear emergency preparedness, presumably because they believe Pickering poses significant risks to their citizens.

We are concerned that, if an accident occurred, evacuation would be exceedingly difficult. More than a million people live within 20 kilometres of the Pickering station. Moving this number of people is complicated at the best of times; during the panic of a nuclear meltdown it could prove beyond our ability.

Third, we don't need Pickering's output. Although decarbonizing the economy will require additional electricity, this power can come from new investments in renewables and conservation. Conservation's importance cannot be overstated. The Environmental Commissioner says, "Electricity conservation remains the cheapest way to match supply and demand."

Finally, we are concerned about Pickering's impact on the ecology of Lake Ontario. We understand that last year the station killed some 25,000 kilograms of fish. Though OPG was told to cut fish kills significantly, the 2017 deaths were far greater than those in 2016.

In sum, renewing Pickering's licence is not in the public interest. The station threatens Ontarians' pocketbooks and well-being and harms the aquatic environment. Because much of its power is surplus, it could easily be replaced by trimming demand and expanding renewables.

The safest, most cost-effective step would be shutting down the station that houses Canada's oldest commercial reactors.

Thank you.

Gideon Forman,

Climate Change Policy Analyst

David Suzuki Foundation