



**Written submission from  
Jamie Fligg**

**Mémoire de  
Jamie Fligg**

In the Matter of the

À l'égard de

**BWXT Nuclear Energy Canada Inc.,  
Toronto and Peterborough Facilities**

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**BWXT Nuclear Energy Canada Inc.,  
installations de Toronto et Peterborough**

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Application for the renewal of the licence for  
Toronto and Peterborough facilities

Demande de renouvellement du permis pour les  
installations de Toronto et Peterborough

**Commission Public Hearing**

**Audience publique de la Commission**

**March 2 to 6, 2020**

**Du 2 au 6 mars 2020**

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RE: BWXT Nuclear Energy Canada's application to license FFOL-3620.1/2020

I am very concerned for my community as a result of BWXT's Licence activities and the proposal to produce uranium rich pellets from uranium dust in Peterborough. It is very disturbing that communities that lack economic profile are chosen as a good place for harmful industries and activities to occur in the pure name of economics. There are real health concerns and environmental concerns associated with expanding BWXT's operations to processing.

It's a choice of convenience, to rely on a former well planned out land use planning decision in order to determine where appropriate industrial activities should take place. In the late 1800's, it was perfectly appropriate to layout a full city block for industrial activity in the current location of the former General Electric company. Over 100 years later, that good decision of the day has resulted in illness and ruined lives for those people who now live in the shadow of that property.

The city has surrounded the former appropriate industrial lands, making them no longer appropriate, suitable, or morally and ethically sound for industrial activity. In the modern age, Industrial parks have replaced ad hoc, central locations for industry. This planning construct allows for smart growth of industries, while limiting or eliminating risks to adjacent neighbourhoods. Land use decisions need to be dynamic over time to allow for wise use and best use decisions to evolve as the landscape around them does. City planning in the 1800s had the luxury of ample land to locate industrial operations. Unfortunately, the decisions made in the 1800s continue to be considered as appropriate land use decisions over a hundred years later. Please explain to me why, beyond convenience, Peterborough's Industrial Parks have not been chosen for this industry? Why are we relying on an 1800's land use planning decision in the year 2020?

It makes no sense whatsoever to locate a radioactive industry in the heart of a residential neighbourhood, less than 1 km upwind from the downtown core. I live nearly 1km east of the downtown core and despite the distance between my house and Park Street South, I am in the immediate path of BWXT's emissions, less than 2km away. This information is taken from Figure 2.4 of the BWXT Consolidated Environmental Risk Assessment.

I am the father of two young children and I am extremely concerned for their health, safety, and wellbeing based on BWXT's location and current activities. Their proposed expansion will endanger our community in ways that no one has studied, reported on, or even considered. This situation is in no way comparable to their current practice at the Toronto location. More than 100 year old Peterborough infrastructure, with it's sad history of people getting sick and lives ruined, isn't going to improve with BWXT's proposal. This outcome can only go one way, with more sickness, more lives ruined, more contamination and more sadness for the City of Peterborough.

Currently BWXT's reliance on Lake Ontario to dilute their effluent masks their true impact. The hydrological impact will be felt in far more ways in the smaller Otonabee River watershed. Little Lake, with it's own sad history of PCB laden sediments, will be destined to receive materials from BWXT. The long term affects on the much smaller watershed in Peterborough, and the Otonabee River could be devastating. Can you share with me how hydrological studies have shown this to be a safe and morally acceptable location for BWXT's operations?

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The only moral decision is to deny or defer this license application. Uranium pelleting is not appropriate in an urban centre, it is not appropriate for existing contaminated lands, it is not appropriate within metres of a primary school. This proposal has not been met with proper public process or environmental assessment.

I strongly encourage you to deny BWXT's proposal and limit their activities at their current location. That location needs a lot of attention focussed on healing, and where possible, reparation of former industrial lands. Don't enable Peterborough's existing sad legacy to perpetuate at this site.

Respectfully,

Jamie Fligg