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**Written submission from the  
Provincial Building and  
Construction Trades Council  
of Ontario**

**Mémoire du  
Provincial Building and  
Construction Trades Council  
of Ontario**

In the Matter of the

À l'égard de

**Canadian Nuclear Laboratories,  
Douglas Point Waste Facility**

**Les Laboratoires Nucléaires Canadiens,  
installation de gestion des déchets de  
Douglas Point**

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Application to amend the waste facility  
decommissioning licence for the Douglas  
Point Waste Facility

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Demande de modification du permis de  
déclassement de l'installation de gestion des  
déchets de Douglas Point

**Commission Public Hearing**

**Audience publique de la Commission**

**November 25-26, 2020**

**25 et 26 novembre 2020**

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October 21, 2020

Canadian Nuclear Safety Commission (CNSC)  
280 Slater Street - P.O. Box 1046  
Ottawa, Ontario K1P 5S9  
[cns.interventions.ccsn@canada.ca](mailto:cns.interventions.ccsn@canada.ca)

Re: Phase III Decommissioning and Dismantling of Douglas Point Waste Facility

To Whom It May Concern,

The Provincial Building and Construction Trades Council of Ontario (Ontario Building Trades Council) consists of 12 international craft unions in the construction industry with a total membership of 150,000 workers, with locals being situated in both urban and remote regions of the province. The purpose of this letter is to support Canadian Nuclear Laboratories Limited's (CNL) application to proceed with Phase III of the decommissioning of the Douglas Point Waste Facility which involves the dismantling of all remaining facilities.

The decommissioning and dismantling means that low and intermediate-level radioactive waste will be packaged in licensed containers and safely transported to the Chalk River Laboratories site. The Ontario Building Trades Council supports decommissioning Douglas Point which would allow for the consolidation of all radioactive waste in one facility, at the Chalk River Laboratories site. The consolidation of radioactive materials in one facility would help reduce risk while at the same time protecting the environment and protecting the public and all Building Trades workers.

The removal of the reactor building, and the spent fuel canisters is not scheduled to occur until after 2030. Over the next few decades, input from the public and Indigenous groups will be essential to planning and implementing the project. The Building Trades Council supports strong community engagement and is a proponent of workforce development through skills training with Indigenous groups and other partners.

The Building Trades Council acknowledges that the next phase will be a multi-year project which will lead to the removal of the facility by 2070. We are convinced that with the skills and expertise of the Building Trades unions, the work will be performed safely for workers and the community. Additionally, the next phase will have a positive multiplier effect in terms of jobs for Building Trades workers and will help expand economic opportunities for surrounding communities. We hope that the CNSC moves forward in granting approval for this initiative so that all concerned parties may begin to work with CNL to move the project forward.

Sincerely,

Patrick J. Dillon, Business Manager and Secretary Treasurer