



Oral presentation

Exposé oral

**Written submission from
Chris Cavan**

**Mémoire de
Chris Cavan**

In the Matter of the

À l'égard des

Canadian Nuclear Laboratories (CNL)

Laboratoires Nucléaires Canadiens (LNC)

Application from the CNL to amend its Chalk River Laboratories site licence to authorize the construction of a near surface disposal facility

Demande des LNC visant à modifier le permis du site des Laboratoires de Chalk River pour autoriser la construction d'une installation de gestion des déchets près de la surface

**Commission Public Hearing
Part 2**

**Audience publique de la Commission
Partie 2**

May and June 2022

Mai et juin 2022

May 31, 2022 Public Commission Hearing - Canadian Nuclear Laboratories Radioactive Waste Disposal Facility

This is my written submission.

Please note that I am also requesting to do an oral presentation via Zoom as I cannot appear in person for health reasons during COVID.

Chris Cavan

Attention: Canadian Nuclear Safety Commission (CNSC) president and members:

Ms. Rumina Velshi, President

Dr. Timothy Berube

Dr. Sandor Demeter

Mr. Randall Kahgee

Dr. Marcel Lacroix

Ms. Indra Maharaj

Commissioners: caretakers of the Ottawa River and its millions of inhabitants,

I have carefully read your background information that is posted on the CNSC website (<http://nuclearsafety.gc.ca/eng/the-commission/commission-members/>).

You have impressive credentials, all of you. You are charged with grave responsibility in these hearings. Your backgrounds in science, technology, medicine and law are commendable.

It is not your academic achievements or nuclear expertise and experience that I wish to call upon for this submission, however. I urge you to use your fine minds to open your hearts and spirits so you can read my words with respect and careful consideration.

In a matter that is as grave and potentially life changing and lethal for millions of people, I would like to set aside the terms “intervener” and “commissioner”.

intervenor

: one who intervenes especially : one who intervenes as a third party in a legal proceeding.

: a person or organization who may not be directly involved in a legal case as a main party but who is mentioned as they will also be affected in some way by the outcome

commissioner

: a person appointed to a role on or by a commission.

: a representative of the supreme authority in an area.

I don't feel that these labels should define us in this process. All humans are equal. If there is "supreme authority", there must also be supreme responsibility. As people who depend on the Ottawa River for life itself, we are not merely a "third party" who would be affected in "some" way by the outcome of these proceedings. Our health and our very lives depend on the outcome of these proceedings.

At the CNSC hearings in Pembroke in 2018 about granting a 10-year licence to Canadian Nuclear Laboratories, people who drove for hours in the dead of winter to do presentations with open hearts, minds and much hope were disregarded and disrespected. Many of these presentations were prepared by volunteers – seniors and concerned citizens – who spent many hours of their time researching and writing draft after draft in consultation with various experts, lawyers and stakeholders who care about the vitality of the Ottawa River. These unpaid citizens who presented to the CNSC in 2018 were met with indifference, boredom and closed minds and hearts. The overall impression of those who attended those hearings was that "intervenor" are unimportant people who would have no effect whatsoever on the outcome.

We were ignored and barely tolerated. The decision was already made. We found this barely concealed contempt for process shocking in a democratic country.

You must do better this time.

We all share responsibility for protecting our environment. There are no third worlds or third parties. We exist because of a web of interdependence and connection to all living things. We can only ever be as healthy as our natural surroundings and our natural resources. It's our duty as partners in this delicately balanced ecosystem to cooperate with one another on equal footing. Our precious resources and the future of all species on this planet are currently at the most perilous crossroads that humans have ever recorded in our brief history on Earth. We are the only species with such arrogance and short-sightedness about our

future and convenient forgetfulness or ignorance about the history of our failures to protect what can never be replaced.

The Ottawa River is a sacred resource for all of us who live near its waters and beyond. No one owns these waters. We are merely guardians and protectors.

Water on this Earth is LIFE. It is sacred and precious. It is our duty to protect this sacred resource from any potential harm. Any risk of contaminating this resource cannot be tolerated.

I am a mother and grandmother. I am vitally connected to a large family. My children and grandchildren should enjoy the precious resource of the Ottawa River and thrive along its shores as I have for almost 70 years. Our cottage, where we've gathered for over 50 years, is at Fort William/Sheenboro, Quebec. I'm one of the founding members of the Old Fort William Cottagers' Association. Ours is the first community that would be affected by any spills or accidents that would occur at CNL's massive proposed above-ground disposal facility at Chalk River, a scant kilometer from our beloved River.

I will not reiterate the many flaws in this proposal or the myriad concerns that thousands of people have expressed in petitions, letters, hearing submissions and other forms of communication to your Commission.* **(at end of document)**

I will not highlight all the times over CNL's/AECL's history that there have been spills and accidents. You know all these facts and must weigh the potential for further contamination of the Ottawa River in this decision you are making to locate this enormous amount of radioactive material and other deadly toxins so close to the River. Many radioactive waste materials that will be lethal for thousands of years will be abandoned after some unknown number of decades just a kilometer from the life-sustaining waters of the Ottawa River that millions of people have entrusted to your oversight.

The safety of these sacred waters for millennia to come is currently in your hands. Our children and generations of grandchildren are depending on you to get this right. It behooves you and your fine credentials to make the most watertight, water right decision you can possibly make to protect the Ottawa River.

You are charged with weighing all of the nuclear industry's history, the engineering facts and many risks in an extremely unstable world. You must

carefully examine all of the scientific and historical evidence that comes to bear on this grave decision that you are making as caretakers of the Ottawa River and protectors of public safety for generations to come. Every decision you make for the Canadian Nuclear Laboratories at Chalk River and its other sites in Canada is fraught with this onerous responsibility.

You must get this right. You must make the wisest, best decision to safeguard the Ottawa River from potential, irreversible contamination. Political expediency, cost cutting and rushing into an easier, cheaper solution must not sway your responsibility to protect the Ottawa River.

This proposed disposal facility is much too close to the Ottawa River and must be moved elsewhere. Period.

With all due respect to the collective expertise among your members, you cannot predict the future for tens of years much less hundreds or thousands of years and yet the hazards of these potentially lethal wastes you are prepared to dispose of so close to the Ottawa River will outlive your decisions through the lifetimes of generations to come. An incomplete list of radionuclides, provided in CNL's final EIS (Table 3.3.1-2), indicates that 25 of 31 radionuclides have half-lives ranging from four centuries to more than four billion years.

I would expect that you take your responsibilities on the Commission as seriously as life itself. To do otherwise in these very uncertain times of catastrophic weather, global pandemic and war would be abdicating your grave responsibility. We would like to trust that you will take all of these appeals seriously and weigh the risks of this enterprise extremely carefully.

What is at stake for millions of people along the Ottawa River in this hearing is life itself. Water is life for all of us. We must never jeopardize this sacred resource for profit or risk the vitality of the water of the Ottawa River and its ability to sustain all life forms both within it and along its shores.

As a doctor, you must consider the health of future generations.

As protectors of public safety along the Ottawa River, you cannot fail to consider any reasonable risk that would result from unforeseeable climate changes, catastrophic weather events, terrorist attacks, war, earthquakes or other geological factors.

As a lawyer or person charged with public safety and the careful examination of the CNL consortium's business plans and detailed specifications for this massive disposal site, you accept the liability that your decisions hold for millions of people along the Ottawa River for hundreds and thousands of years to come.

MOST IMPORTANTLY, this grave decision about the location of this massive amount of radioactive material and toxic waste so close to the Ottawa River must be considered with great compassion of heart and in the spirit of honouring all life in our already overly threatened ecosystem.

We are forced to trust that you do not make these decisions lightly or in complicity with pressures from government or for-profit corporate entities. These forces are fleeting at best. The decisions you make will have grave consequences for generations to come and that is what this mother and grandmother is asking you to consider.

“Commissioners, your mandate under the Nuclear Safety and Control Act is to protect Canadians and the environment from radioactive materials which pose devastating threats to all life on Earth.

The materials destined for this dump if you approve it, will be hazardous and radioactive for many millennia. The proponent's own studies show the dump will leak continually and disintegrate in a few hundred years.

If you approve this dump you will have failed to protect the Canadian public.

You will have failed to protect future generations.

You will have failed to protect the environment and other life forms.

You will have failed to protect the Ottawa River.

You will also have failed to uphold Canada's commitment as a party to the International Joint convention on radioactive waste.

On the other hand, you can do the right thing and refuse to approve this leaking radioactive monstrosity. You could direct, with you and your successors' oversight, that this facility be moved to a much safer location as far from the Ottawa River as possible.

What will your personal legacy be?"

Thank you for your time and consideration.

Chris Cavan

*Avaaz online petition PROTECT OUR RIVERS/PROTÉGEZ NOS RIVIÈRES posted 2 June 2017 (Updated 2 December 2019) that has 1,695 signatures:
https://secure.avaaz.org/community_petitions/en/Catherine_McKenna_Minister_of_Environment_and_Climate_Change_Stop_nuclear_and_toxic_waste_mega_dump_on_Ottawa_River/

***The Assembly of First Nations and 140 municipalities, towns and cities have adopted resolutions in Quebec and Ontario opposing or expressing serious concerns about Canadian Nuclear Laboratories' (CNL's) proposal for an above ground radioactive waste disposal facility one kilometre from the Ottawa River.**