

April 3, 2020

The Right Honourable Justin Trudeau
Prime Minister of Canada
Office of the Prime Minister
80 Wellington Street
Ottawa, Ontario
K1A 0A2

Dear Mr. Trudeau,

We are writing to request your urgent attention to a number of serious concerns related to nuclear governance and nuclear safety in Canada.

We recognize that you are dealing with the coronavirus pandemic and that many urgent matters demand your attention at this time. We appreciate your leadership and the actions of your government to date. However, inadequate nuclear safety and governance in the nuclear field entail very serious risks for the health of current and future generations of Canadians. We therefore earnestly urge that the issues raised herein be given their rightful place on the priority list of your government in the coming months.

The International Atomic Energy Agency (IAEA) recently reviewed Canada's nuclear safety framework and its [final report](#) [1], released in Canada on February 18, identified [numerous deficiencies](#) [2] requiring attention by the Government of Canada. Deficiencies include:

- failure to establish a national policy and a strategy for radioactive waste management,
- lack of alignment with IAEA guidance on nuclear reactor decommissioning,
- failure to expressly assign the prime responsibility for safety to the person or organization responsible for a nuclear facility,
- failure to explicitly address the principle of justification – a requirement to demonstrate an overall net benefit prior to approval of any new sources of radiation exposure, new nuclear facilities or activities,
- inconsistent dose constraints for nuclear facilities,
- unsatisfactory transportation management systems for nuclear materials, and
- inadequate radiation protection for nuclear workers such as regulations allowing four times higher radiation doses for pregnant women than IAEA standards would countenance

We believe all these failings require urgent attention by the Government of Canada.

[Environmental Petition 427](#) [3], “Nuclear Governance Problems in Canada, submitted to the Auditor General of Canada in June 2019, identified numerous serious problems in Canada’s nuclear governance regime, including outdated and inadequate legislation, lack of government oversight, no checks and balances, a federal policy vacuum on nuclear waste and nuclear reactor decommissioning, and regulatory capture of the

Canadian Nuclear Safety Commission (CNSC). The petition recommended creation of a high-level, interdisciplinary, multi-stakeholder task force with representation from civil society groups, First Nations and industry to advise on nuclear governance reforms in Canada.

It is our strong conviction that Canada’s nuclear governance and nuclear safety framework are failing to adequately protect Canadians from hundreds of dangerous radioactive substances that are produced by nuclear reactors. Exposure to these radioactive substances can cause serious chronic diseases, birth defects and genetic damage that is passed on to future generations. According to the US National Research Council [BEIR VII report](#) [4], there is no safe level of exposure to ionizing radiation released from nuclear reactors and nuclear waste facilities. We urge you to make it a priority to correct the deficiencies noted by the IAEA peer review and in Environmental Petition 427 to the Auditor General.

We also have serious concerns about the recent appointment of CNSC President Rumina Velshi to chair the IAEA Commission on Nuclear Safety Standards. Our concerns are explained in [a letter to IAEA Director General Rafael Grossi](#) [5] which requests that the appointment be reconsidered. Briefly, we believe the CNSC is a captured regulator with a documented record of disregarding IAEA safety standards or watering down their domestic application; therefore its president – a previous senior officer within Ontario Power Generation – should not chair this IAEA commission.

In the absence of a strong nuclear governance regime and a comprehensive nuclear safety framework, the Government of Canada’s rush to promote and to invest in small modular nuclear reactors is, we believe, ill-advised. In particular, the absence of a requirement in Canada’s nuclear safety framework to justify the increased radiation exposures and increased legacy of radioactive waste of all kinds that would result from developing and deploying SMNRs, is enabling your government to proceed without due consideration of faster, cheaper and lower risk alternatives available for reducing Canada’s greenhouse gas emissions, as documented in [Environmental Petition 419 to the Auditor General of Canada](#) [6] “Concerns about investment in new nuclear technology”.

Finally, we note a fundamental conflict of interest in having the CNSC report to Parliament through the Minister of Natural Resources, who is responsible for promoting nuclear power under the *Nuclear Energy Act*. This reporting relationship could be changed through an Order-in-Council decision without any change to existing legislation.

We urge you to act swiftly to establish sound nuclear governance and a comprehensive nuclear safety framework in Canada. We respectfully point out that the needed reforms are not only an issue for your Minister of Natural Resources, but also require attention from departments including Justice, Health, Finance, Treasury Board, and Environment and Climate Change.

We look forward to hearing from you.

Yours truly,

Gordon Edwards, Ph.D,
Canadian Coalition for Nuclear Responsibility

Éric Notebaert, MD, M.Sc.
Canadian Association of Physicians for the Environment

Ole Hendrickson, Ph.D
Ottawa River Institute

CC:

The Hon. François-Philippe Champagne, Minister of Foreign Affairs
The Hon. Seamus O'Regan, Minister of Natural Resources
The Hon. David Lametti, Minister of Justice
The Hon. Bill Morneau, Minister of Finance
The Hon. Patti Hajdu, Minister of Health
The Hon. Jean-Yves Duclos, President of the Treasury Board
The Hon. Jonathan Wilkinson, Minister of Environment and Climate Change
The Hon. Andrew Scheer, Conservative Party of Canada
Yves-François Blanchet, Bloc Québécois
Jagmeet Singh, New Democratic Party
Elizabeth May, Green Party of Canada, Parliamentary Caucus Leader
Sylvain Ricard, Auditor General of Canada
Andrew Hayes, Interim Commissioner of Environment and Sustainable Development

Links

1. REPORT OF THE INTEGRATED REGULATORY REVIEW SERVICE MISSION TO CANADA, International Atomic Energy Agency https://www.iaea.org/sites/default/files/documents/review-missions/irrs_canada_2019_final_report.pdf
2. International Peer Review Finds Deficiencies in Canada's Nuclear Safety Framework. Concerned Citizens of Renfrew County and Area, February 2020. <https://concernedcitizens.net/2020/03/07/international-peer-review-finds-deficiencies-in-canadas-nuclear-safety-framework/>
3. Environmental Petition 427 to the Auditor General of Canada, June 2019. Petition summary: https://www.oag-bvg.gc.ca/internet/English/pet_427_e_43421.html and full text of petition: <https://concernedcitizens.net/2019/11/30/environmental-petition-nuclear-governance-problems-in-canada/>
4. National Research Council. 2006. Health Risks from Exposure to Low Levels of Ionizing Radiation: BEIR VII Phase 2. Washington, DC : The National Academies Press. <https://www.nap.edu/catalog/11340/health-risks-from-exposure-to-low-levels-of-ionizing-radiation>
5. Letter to IAEA Director General Rafael Grossi, March 12, 2020. http://ccnr.org/Letter_IAEA_2020_e.pdf
6. Environmental Petition 419 to the Auditor General of Canada, November 2018. Petition summary: https://www.oag-bvg.gc.ca/internet/English/pet_419_e_43275.html and full text of petition: <https://tinyurl.com/Env-Petition-419>