

March 2, 2016

Michael Goffin
Regional Director General
Ontario Region
Environment and Climate Change Canada
4905 Dufferin Street
Toronto, Ontario
M3H 5T4

Cameron Davis
Senior Advisor to the Administrator
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois
60604-3507

Transmission: by email

Re: Nomination of Radionuclides as a Chemical of Mutual Concern under the GLWQA

Dear Great Lakes Executive Committee Co-Chairs:

The undersigned 110 environmental, health and other advocacy groups urge the Canadian and U.S. federal governments to jointly designate radionuclides as Chemicals of Mutual Concern according to their responsibility in Annex 3, Part B, Sec. 2 of the Great Lakes Water Quality Agreement 2012.

This recommendation is based on our following findings:

- Radionuclides can have very serious immediate, long-term and intergenerational effects on human and non-human health;
- There is no level of radionuclides below which exposure can be defined as “safe;” therefore, very low levels of exposure can be significant;
- The inevitable exposure to naturally occurring radiation means that we should be even more cautious about avoiding additional body burdens resulting from exposure to radionuclides as a result of human activities over which we can have more control;
- There is a uniquely large number of facilities in the Great Lakes Basin containing, using, storing, and disposing of radionuclides for power generation purposes near the shores of the Great Lakes, and there are proposals for additional ones; for example, as of May 2013, there were 38 operating nuclear power reactors and 12 closed reactors located in the Basin (See attached map);
- The large number of facilities around the Great Lakes Basin, usually near the shoreline, result in on-going regular discharges into the lakes as well as a high probability of accidents that release higher amounts of radionuclides.
- This large number of facilities near the shores of the Great Lakes means a high likelihood of radioactive materials being transported on the lakes or across the rivers that connect the Great Lakes, with the potential for spills during transportation, as well as during loading and unloading;

- The Great Lakes have characteristics that make them particularly susceptible to persistent toxic substances. As some radionuclides persist for extremely long periods of time, this means that the protective measures will need to be different in the Great Lakes than in an ecosystem with different characteristics; and,
- There are substantial well-documented scientific, medical and public concerns about the threats posed by radionuclides in the Great Lakes Basin.

The attached document prepared for the Canadian Environmental Law Association presents evidence to support each of the findings we just listed.¹

In 1997, the IJC's Nuclear Task Force reported that the data currently available on releases and presence of radionuclides in the Great Lakes ecosystem are inadequate to gain an understanding of the sources and of the impacts of radionuclides on the ecosystem. Unfortunately that situation has not changed in the almost two decades that have passed since that finding.

The lack of data should not be seen by the governments as a reason to not now designate radionuclides as a Chemical of Mutual Concern. It is clear from Annex 3, Part C. Science of the GLWQA that a prime purpose in a designation is to put a focus on obtaining the data and understandings needed. For example item 1 in part C lists the following commitment: "identifying and assessing the occurrence, sources, transport and impact of chemicals of mutual concern, including spatial and temporal trends in the atmosphere, in aquatic biota, wildlife, water and sediments."

Given that radionuclides are persistent toxic substances, given a situation where there is a substantial number of facilities that are a source of radionuclides to the Lakes, and given the relatively closed characteristics of the Great Lakes system, which means that radionuclides build up in the system, it is essential to designate radionuclides as a Chemical of Mutual Concern so that the data and science needed will be generated and so that preventive actions can be taken to protect the Lakes from threats from radionuclides.

In determining whether to make the designation, the Parties should be guided by the Principles and Approaches section in the GLWQA [Article 2, part 4], which calls for "prevention," "precaution," "anti-degradation," "ecosystem approach." All of these principles point to the requirement for a radionuclides designation.

In the consideration of radionuclides as a Chemical of Mutual Concern and in the development of a binational strategy once the designation has occurred, the Parties should ensure full opportunities for public engagement.

¹ Canadian Environmental Law Association, Radionuclides as a Chemical of Mutual Concern, February 2016.

We the undersigned groups look forward to working with you in the development and implementation of a binational strategy for radionuclides - a Chemical of Mutual Concern.

Signatory Organizations:

Action cancer du sein du Québec/Breast Cancer Action Québec [Québec], Jennifer Beeman, Directrice générale (Jennifer.Beeman@acsqc.ca, 514-483-1846)

Alliance for a Green Economy (AGREE) [New York], Andra Leimanis, Organizer (info@allianceforagreenconomy.org, 315-480-1515)

Alliance for the Great Lakes [Illinois]; Olga Lyandres, Research Manager (olyandres@greatlakes.org, 312-445-9749)

Alliance to Halt Fermi 3 [Michigan], Ethyl Rivera, Co-Chair (erivera1446@comcast.net, 248-464-2689); Carol Izant (cogknot@yahoo.com)

Benedictine Sisters of Erie PA [Pennsylvania], Pat Lupo, OSB (plupo@neighborhoodarthouse.org, 814-490-3108)

Beyond Nuclear [Maryland], Kevin Kamps, Radioactive Waste Watchdog (kevin@beyondnuclear.org, 240-462-3216)

Bluewater Coalition Against the DGRs [Ontario], Ellen Dailey, Spokesperson (edailey@mac.com, 814-881-5103)

Boston Downwinders [Massachusetts], Guntram Mueller (guntrammuel1@gmail.com, 617-969-2150)

Breast Cancer Action Manitoba [Manitoba], Louise Schoenherr, President (kschoenh@mymts.net, 204-257-2649)

Bruce Peninsula Environment Group [Ontario], Ziggy Kleinau, Outreach Director (ziggyk38@gmail.com)

Canadian Association of Physicians for the Environment [Ontario], Cathy Vakil, (cathyvakil@gmail.com, 416-306-2273)

Canadian Coalition for Nuclear Responsibility [Québec], Gordon Edwards, President, (ccnr@web.ca, 514-489-5118)

Canadian Environmental Law Association [Ontario], Theresa McClenaghan, Executive Director (Theresa@cela.ca, 416-960-2284)

Canadian Unitarians for Social Justice [Ontario], Margaret Rao, President
(president@cusj.org, 416-658-0998)

Cape Downwinders [Massachusetts], Diane Turco, Director (tturco@comcast.net, 508-776-3132)

Central Ohio Green Education Fund [Ohio], Suzanne Patzer, Chair
(spatzer1959@gmail.com, 614-374-2448)

Chemical Sensitivities Manitoba [Manitoba], Sandra Madray (madray@mts.net, 204-256-9390)

Church in Society Committee, St. Thomas-Wesley United Church [Saskatchewan], Vicki Obedkoff (minstw@sasktel.net, 306-244-7676)

Citizens Environment Alliance of southwest Ontario [Ontario], Derek Coronado
(dcoronado@cogeco.net, 519-973-1116)

Citizens for Alternatives to Chemical Contamination [Michigan], Wesley Raymond,
Administrator (wesraymond@caccmi.org, 989-544-3318)

Citizens' Network on Waste Management [Ontario], John Jackson, Coordinator
(jjackson@web.ca, 519-744-7503)

Citizens' Resistance at Fermi 2 (CRAFT) [Michigan], Jessie Pauline Collins, Co-chair
(jessiepauline2003@yahoo.com)

Coalition for a Clean Green Saskatchewan [Saskatchewan], Karen Weingeist
(info@cleangreensask.ca, 306-653-1686)

Coalition for a Nuclear Free Great Lakes [Michigan], Michael J. Keegan, Chairperson
(mkeeganj@comcast.net, 734-770-1441)

The Columbus Free Press [Ohio], Bob Fittrakis, Editor (robertfittrakis@gmail.com, 614-374-2380)

Conservation Council of New Brunswick [New Brunswick], Lois Corbett, Executive
Director (lois.corbett@conservationcouncil.ca, 506-458-8747)

Council of Canadians [Ontario], Ailish Morgan-Welden (amorgan@canadians.org, 416-979-5554)

Crawford Stewardship Project [Wisconsin], Forest Jahnke, Crawford Stewardship
Project Coordinator (forestjahnke@gmail.com, 608-632-2183)

Crooked Creek Conservancy Society of Athabasca [Alberta], Rosemary Neaves, Chair
(reneaves@telus.net, 780-675-9197)

The Council of Canadians, Windsor Essex Chapter [Ontario], Douglas Hayes, Chair
(dhayes18@cogeco.ca, 519-735-8319)

Don't Waste Michigan (DWMI) [Michigan], Alice Hirt, Co-Chair (alicehirt@gmail.com,
616-218-6511)

Don't Waste Michigan (DWMI) - Sherwood Chapter [Michigan], Kathryn Barnes, Board of
Directors (greenwoodsart@msn.com)

Durham Nuclear Awareness (DNA) [Ontario], Janet McNeill, Coordinator
(info@durhamnuclearawareness.com, 416-792-2024)

Earth Committee, Grey Nuns of the Sacred Heart [New York], Sr. Sheila Stone
(sstonegnsh@aol.com)

Ecological Options Network (EON) [California], Mary Beth Brangan & James Heddle,
Co-Directors (marybeth@eon3.net / jim@eon3.net, 415-868-1900)

Environmental Defence [Ontario], Natalija Fisher, Water Program Manager
(nfisher@environmentaldefence.ca, 416-323-9521 ext. 257)

Fairmont, Minnesota Peace Group [Minnesota], Judi Poulson, Chair
(judpeace@gmail.com, 507-235-5288)

Federation of Ontario Cottagers Association (FOCA) [Ontario], Terry Rees, Executive
Director (trees@foca.on.ca, 705-749-3622)

FORPA Forest Protection Allies [British Columbia], Douglas Gook
(gookmirth60@gmail.com, 250-747-3363)

Freshwater Future [Michigan], Jill Ryan, Executive Director
(jill@freshwaterfuture.org, 231-348-8200)

Freshwater Future Canada [Ontario], April Weppler, Program Manager
(april@freshwaterfuture.org, 231-290-8077)

Friends of Bruce [Ontario], Eugene Bourgeois (eugene@bmts.com, 519-368-5354)

Friends of the Cloquet Valley State Forest [Minnesota], Kristin Larsen, Executive
Director (Kristin@friendscvsvf.org, 218-310-6023)

Fukushima Response Bay Area [California], Phoebe Sorgen, co-founder
(phoebes0@earthlink.net, 510-595-5575)

Georgian Bay Association [Ontario], Bob Duncanson, Executive Director
(rduncanson@sympatico.ca, 416-219-4248)

Great Lakes Committee - Izaak Walton League [Minnesota], Jill Crafton, Chair
(jillgreatlakesike@gmail.com/bccheyenne@msn.com, 952-944-5583)

Great Lakes Environmental Alliance [Michigan], Tanya Keefe, President
(tanya_keefe@yahoo.com, 810-858-1999)

Greenpeace [Ontario] Shawn-Patrick Stensil, Senior Nuclear Analyst
(shawn.patrick.stensil@greenpeace.org, 416-597-8408 (office), 416-884-7053
(mobile))

Greenpeace USA [Washington, D.C.], Jim Ricco, Nuclear Policy Analyst
(jim.ricco@greenpeace.org, 202-462-1177)

Green State Solutions [Iowa], Mike Carberry, Director (mike@greenstatesolutions.com,
319-594-6453)

Home for Peace and Justice [Michigan], Joan McCoy, Coordinator
(homeforpax@aol.com, 989-792-9766)

Huron Environmental Activist League [Michigan], William D. A. Freese, Director
(bfreese10@gmail.com, 989-657-9778)

Ingersoll District Nature Club [Ontario], Sheila Fleming, President
(sheila.fleming@lawsonresearch.com, 519-485-2645)

International Science Oversight Board [Michigan], Lynn Howard Ehrle, Chair
(ehrlebird32@att.net, 734-459-9488)

The Inverhuron Committee [Ontario], Ms. Marti McFadzean, Chairperson
(martimcfadzean@live.com, 519-368-3770)

Justice and Global Issues Team, Toronto Southeast Presbytery of the United Church of
Canada [Canada], George Bartlett, Secretary (g.bartlett@sympatico.ca)

Lake Ontario Waterkeeper [Ontario], Mark Mattson, President (mark@waterkeeper.ca,
416-861-1237)

Lawyers' Committee on Nuclear Policy [Michigan], Anabel Dwyer, Member, Board of
Directors (anabeldwyer@yahoo.com, 231-436-5654)

Michigan Safe Energy Future - Shoreline Chapter (MSEF-SH) [Michigan], Bette Pierman
(Bette49022@yahoo.com, 269-369-3993)

Michigan Stop The Nuclear Bombs Campaign (MISTNBC) [Michigan], Kim Joy Bergier, Co-coordinator (2mistnbc@gmail.com, 248-545-1862/248-515-2380 (mobile))

Midronomics [Ontario], D Tim Seitz (Dtimseitz@gmail.com)

Midwest Environmental Advocates [Wisconsin], Kimberlee Wright, Executive Director (kwright@midwestadvocates.org, 608-251-5047, ext. 4)

MiningWatch Canada [Canada], Ugo Lapointe, Canadian Program Coordinator (golapi@yahoo.com, 613-569-3439)

Mother Earth Action Co-operative Ltd. [Saskatchewan], Dave Greenfield, Chairperson (greendl@sasktel.net, 306-665-9157)

National Council of Women of Canada [Canada], Gracia Janes for NCWC President Karen Monnon Dempsey (gracia.janes@bellnet.ca, 902-422-8485)

National Network on Environments and Women's Health [Ontario], Anne Rochon Ford, Co-Director (annerf@yorku.ca, 416-712-9459)

National Wildlife Federation, Great Lakes Regional Center [Michigan], Mike Shriberg, Regional Executive Director (shribergm@nwf.org, 734-887-7107)

Nature Québec [Québec], Christian Simard, Directeur général (direction@naturequebec.org, 418-648-2104 ext. 2071)

Nipissing Environmental Watch [Ontario], Peggy Walsh Craig, Membership Chair (peggy@peggywalshcraig.com, 705-840-8466)

Northwatch [Ontario], Brennain Lloyd, Project Coordinator (northwatch@northwatch.org, 705-497-0373)

Nuclear Energy Information Service (NEIS) [Illinois], David A. Kraft, Director (neis@neis.org, 773-342-7650)

Nuclear Hotseat [California], Libbe HaLevy, Producer/Host (info@nuclearhotseat.com)

Nuclear Information and Resource Service [Maryland], Diane D'Arrigo (dianed@nirs.org, 301-270-6477 x15)

Ohio CARE - Ohio Citizens Against a Radioactive Environment [Ohio], Connie Kline (Klineisfine@aol.com, 440-946-9012)

Ohio Environmental Council [Ohio], Kristy Meyer, Managing Director, Agricultural, Health & Clean Water Programs (KMeyer@theOEC.org, 614-487-5842)

On Behalf of Planet Earth [Massachusetts], Sheila Parks, Ed.D., Founder
(sheilaruthparks@comcas.net, 617-744-6020)

Ontario Clean Air Alliance [Ontario], Angela Bischoff, Outreach Director,
(angela@cleanairalliance.org, 416-260-2080 ext. 1)

Ontario Headwaters Institute [Ontario], Andrew McCammon, Executive Director
(andrew@ontarioheadwaters.ca, 416-231-9484)

Ontario Rivers Alliance [Ontario], Linda Heron, Chair
(LindaH@OntarioRiversAlliance.ca, 705-866-1677)

The Oxford Coalition for Social Justice [Ontario], Lori Leblanc, Spokesperson
(Lorileblanc.lv@gmail.com, 519-537-2099)

Oxford Environmental Action Committee (OEAC) [Ontario], Suzanne Crellin, President
(suzanne@heavyindustry.org, 519-852-0832)

Oxford People Against the Landfill (OPAL) [Ontario], B.J. Smith, President
(bryasmit@oxford.net, 519-456-5270)

Palisades Park Country Club [Michigan], Jody Flynn (Jodygflynn@gmail.com, 317-506-0803)

Pennsylvania Lake Erie Watershed Association (PLEWA) [Pennsylvania], Sarah Galloway, Chairperson (sgalloway@erie.pa.us)

Pilgrim Coalition [Massachusetts], Norman B. Pierce, PhD, secretary
(npiercephd@aol.com, 617-435-8872)

Port Hope Community Health Concerns Committee [Ontario], Faye More, Chair
(More_faye@yahoo.com; 905-885-7991)

Preservation of Agricultural Lands Society [Ontario], Douglas Woodard, President
(dwoodard@becon.org, 905-682-4349)

Prevent Cancer Now [Canada], Dr. Meg Sears, Chair (Meg@PreventCancerNow.ca, 613-297-6042)

Provincial Council of Women of Ontario [Ontario], Gracia Janes, PCWO VP
Environment (gracia.janes@bellnet.ca, 905-468-2841)

Quill Plains Chapter, Council of Canadians [Saskatchewan], Elaine Hughes, Chair
Person (tybach@sasktel.net, 306-323-4901)

Redwood Alliance [California], Michael Welch (mwelch@redwoodalliance.org, 707-822-7884)

Registered Nurses' Association of Ontario [Ontario], Dr. Doris Grinspun, CEO (DGrinspun@rnao.org, 416-599-1925)

Save Our Sky Blue Waters [Minnesota], Lori Andresen (andres01@charter.net, 218-340-2451)

Save The River / Upper St. Lawrence Riverkeeper [Ontario / New York], Lee Willbanks, Riverkeeper, Executive Director (lee@savetheriver.org, 315-686-2010)

Science for Peace [Ontario], Judith Deutsch (j.deutsch@utoronto.ca, 416-978-3606)

Sept-Îles Sans Uranium [Québec], Marc Fafard, Spokesperson (fafard.marc@gmail.com, 418-961-3517)

Sierra Club [Washington D.C.], Debbie Sease, Federal Policy Director (debbie.sease@sierraclub.org)

Sierra Club, Binational Great Lakes Committee [Ontario], Lino Grima, Co-chair (lino.grima@utoronto.ca); Wayne D. Howard, Co-chair (wdhoward@rochester.rr.com)

Sierra Club Canada Foundation [Ontario], Diane Beckett, Interim Executive Director (diane@sierraclub.ca, 613-241-4611)

Straits Area Concerned Citizens for Peace, Justice and the Environment [Michigan], Karen Martin, Founder (Peacemam@att.net, 231-627-6758)

Sun Day Campaign [Maryland], Ken Bossong, Executive Director (sun-day-campaign@hotmail.com, 301-270-6477 ext.11)

Tip of the Mitt Watershed Council [Michigan], Grenetta Thomassey, PhD, Program Director (grenetta@watershedcouncil.org, 231-347-1181 ext. 118)

Two Rivers Coalition (TRC) [Michigan], Kevin Haight, President (kevinhaight58@gmail.com, 269-408-6262)

Uranium Watch [Utah], Sarah Fields, Director (sarah@uraniumwatch.org, 435-260-8384)

Wallaceburg Advisory Team for a Cleaner Habitat [Ontario], Kris Lee (ecowrappin(at)hotmail.com)

Watershed Sentinel Educational Society (WSES) [British Columbia], Anna Tilman (annatilman@sympatico.ca)

Windsor on Watch (WOW) [Ontario], James Brophy, PhD (jimbrophy@yahoo.com, 519-735-2944)

Wisconsin Resources Protection Council [Wisconsin], Al Gedicks, Executive Secretary (agedicks@uwlax.edu)

Women's Healthy Environments Network [Ontario], Jenise Lee, Chairperson (office@womenshealthyenvironments.ca, 416-928-0880)

Women's International League for Peace & Freedom, Detroit Branch [Michigan], Laura Dewey, Coordinator (wilpfdetroit@att.net)

INDIVIDUALS

Dr. David Euler, Dean (Retired), Faculty of Forestry, Lakehead University [Ontario] (david euler@xplornet.ca)

Dr. Gail Krantzberg, Professor and Senior Lead, Engineering and Public Policy Program, ETB 510, School of Engineering Practice, McMaster University [Ontario], (krantz@mcmaster.ca, 905-525-9140 ext. 22153)

Professor James O'Reilly, College of Medicine Dept. of Environmental Health, University of Cincinnati [Ohio] (james.oreilly@uc.edu)

Facilities Related to Nuclear Power in the Great Lakes Basin²



² Map outlines facilities that were present or proposed as of April 2013.