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Submission to Uranium Inquiry
of the Bureau d'audiences publiques sur l'environnement,

Pre-consultation Phase Follow-Up On Oral Submission by MiningWatch Canada

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With this brief submission I wish to follow up with the Commissioners on two of the issues I raised during my presentation before them on May 22 in Chelsea. In response to my comments the commissioners questioned me on these and other points and specifically requested additional information on these two issues.

We intend to provide further submissions to the Commission over the course of its mandate.

Independence and Objectivity of CNSC

As mentioned during my presentation, from my own personal experience participating in hearings for the proposed Matoush Uranium Project, and reviewing documents and the website of the Canadian Nuclear Safety Commission (CNSC), I am concerned that the federal agency responsible for regulating uranium mining does not operate as an objective guardian of the public interest, but rather tends to confuse its mandate of regulator with that of promoter of the uranium mining and nuclear energy industries. The independence, objectivity and credibility of the CNSC are critically important issues for the inquiry to examine, as Quebeckers will have to put their trust in the agency to ensure their health and safety were uranium mining to be permitted in Quebec.

My experience at the Matoush hearings “inspired” me to write a blog about the hearing which is posted on the MiningWatch website here:

<http://www.miningwatch.ca/blog/i-thought-they-were-shareholders-my-first-look-hearing-cnsc-our-nuclear-watchdog>

It is notable that the information provided on the CNSC’s Health Resources webpage (<http://nuclearsafety.gc.ca/eng/resources/health/index.cfm>) contains no articles which show negative health outcomes from contemporary nuclear power or uranium mining. Similarly the page on the Fukushima disaster reads like a corporate public relations attempt to minimize negative public impressions and cites risk factors spread out over large populations.

One of the explanations for what I perceive as a strong bias in the CNSC is the relatively small community of individuals that are trained to work in the nuclear field. There is a considerable amount of overlap and exchange of people between industry, the regulator, and consultants and this risks creating an insular and self replicating culture with great confidence in nuclear technologies and a perception of risk that is out of whack with the general public.

Many others have similar concerns. Here are several other commentaries that raise the question of the CNSC’s independence and objectivity.

Survey Suggests Nuclear Regulator Does Compromise Safety

<http://newclearfreesolutions.com/2013/10/30/survey-suggests-nuclear-regulator-does-compromise-safety/>

Group questions impartiality of nuclear safety watchdog

<http://www.ph-fare.com/content/group-questions-impartiality-of-nuclear-safety-watchdog>

Takes exception to short period of time with which to respond to nuclear commission

<http://www.thedailyobserver.ca/2010/05/29/takes-exception-to-short-period-of-time-with-which-to-respond-to-nuclear-commission>

Nuclear regulator’s impartiality questioned

http://www.thestar.com/business/2009/12/01/nuclear_regulators_impartiality_questioned.html

Lack of Independent Review

<http://friendsofbruce.ca/dgr/local-voices/dgr/lack-of-independent-review/>

No Contemporary Worker Health Studies and No Continuing Studies of Exposed Workers

CNSC documents acknowledge that uranium miners had higher rates of lung cancer than the general population and that this was likely caused by exposure to radon. (<http://nuclearsafety.gc.ca/eng/resources/health/health-studies/eldorado/index.cfm>)

This conclusion comes from the tracking of health outcomes of workers that were in the uranium mines in Eliot Lake Ontario, and in Beaverlodge and Port Radium Saskatchewan. These mines are now closed and the miners worked under conditions that are not immediately comparable to today's operations. Despite a recommendation for future study and to continue tracking the miners over time, no follow up data has been collected since 1999. This is despite the fact that latency periods could mean that cancers or other health outcomes do not appear until decades after exposure.

Furthermore, no equivalent monitoring is occurring at today's operating U mines. The CNSC has concluded that "it would not be feasible to investigate the risk of excess lung cancer in modern miners because exposures are so low." (<http://www.nuclearsafety.gc.ca/eng/resources/health/health-studies/feasibility-study-saskatchewan-uranium-miners-cohort-study.cfm>)

From my perspective it seems like it would be a worthwhile investment to confirm the assumption that current exposure levels being "safe" by continuing to monitor health outcomes of the miners. The failure to do so and rely on risk predictions is, in my view, another example of the bias within the CNSC.

Thank you for the opportunity to participate in this important review and we look forward to continuing to participate in the process as it moves forward to completion.

Sincere Regards,



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