



August 29, 2016

Michael Goffin
Co-chair, GLEC
Environment and Climate Change
Canada

Cameron Davis
Co-Chair, GLEC
US Environmental Protection
Agency

Transmission: original by email (Michael.Goffin@canada.ca Davis.cameron@Epa.gov)

Dear Michael Goffin and Cameron Davis:

The Federation of Urban Neighbourhoods (Ontario) is an umbrella organization of community associations in Ontario which was founded in 2001. Over the past 15 years we have lobbied the provincial and federal governments for more sustainable policies with respect to land use planning, transportation, and the protection of environmentally sensitive areas such as the Oak Ridge Moraine.

We've also supported efforts by organizations such as the Canadian Environmental Law Association to protect the great rivers and lakes we are blessed with in Ontario.

On March 2, 2016 you received a petition signed by 110 advocacy groups supporting nomination of radionuclides as a Chemical of Mutual Concern under Annex 3, Part B, Section 2 of the Great Lakes Water Quality Agreement 2012.

Potentially dangerous levels of radionuclides are discharged into the Great Lakes Basin as part of the activity of uranium mining and processing as well as being a by-product of operating and decommissioned nuclear power plants. This along with the risk of accidental spills from fuel storage facilities highlights the need for the Canadian and US governments to take mitigation measures to ensure that radionuclide discharges, actual and potential, are treated as a priority by both governments.

It is therefore essential to designate radionuclides as a Chemical of Mutual Concern under Annex 3 of the GLWQA. Doing so will allow for more data collection of the presence of manufactured radionuclides (as opposed to those which are found naturally in this water system) and the assessment of their risk to this water basin. This in turn will lead to more effective binational measures to reduce and anticipate the threats posed by the presence of radionuclides in the Great Lakes Basin.

As president of the Federation of Urban Neighbourhoods I call on the Great Lakes Executive Committee to take this reasonable and important measure to address the potential hazards to the environment of manufactured radionuclides in this magnificent natural heritage area.

Thank you for your attention and consideration.

Sincerely yours,

Archie Campbell
President

**FEDERATION OF
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OF ONTARIO**

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Archie Campbell
President

33 Rochester Street, Unit 6
Ottawa, Ontario K1R 7L3
613-231-7470
campbera@gmail.com