

Secretary, Canadian Section,  
International Joint Commission  
Ottawa, Ontario, K1P 6K6

February 21, 2007

Re: Invitation to comment on Can. – U.S. Air Quality Agreement / Progress Report 2006

Thank you for the opportunity to provide comments on the above Report on behalf of Citizens For Renewable Energy (CFRE), an incorporated, non-profit organization in Ontario.

The Report is a comprehensive piece of work touching on many air emission sources in the Great Lakes Basin, with some findings of improvement.

While reporting includes releases from fossil-fuelled generating stations this doesn't seem to be the case for nuclear generating plants of which there are 13 on the shores of the Great Lakes, 10 on the U.S. side and 3 on the Canadian side, with a total of 33 reactors.

Those 33 reactors might not release carbon dioxide, nitrogen oxide or sulfur dioxide, but they emit a whole host of radioactive gases such as tritium, long lived carbon-14 (5,300 years half-life), and krypton-85 into the air together with toxic chemicals.

They all have nuclear waste facilities attached, with the Bruce Nuclear Power Development on Lake Huron harbouring the largest inventory in North America, if not the world. It also has a large incinerator which is burning low-level radioactive material from all three Canadian nuclear plants on a 24/7 basis, emitting considerable amounts of Particulate Matter.

All these sources are huge contributors to the air pollution sources, assessed in the Report, **and must be monitored, evaluated and reported on!**

It is even more important now to have them included as, especially at the Bruce plant and possibly in the coming years at the Lake Ontario plants, large reactor refurbishing projects are being undertaken involving exhaust and dust releases.

**We certainly expect to have reports on these significant point sources included in the next progress report.**

**The finding of these reports should stir the two governments into action to rigorously cut these debilitating air emissions, which eventually also contaminate our drinking water sources, massively contributing to human health impacts, through strict, enforceable regulations!**

Comments provided on behalf of the members and directors of Citizens For Renewable Energy  
By S. (Ziggy) Kleinau, Coordinator, CFRE.