

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

April 24, 2009

Re: Invitation to comment on the Canada – U.S. Air Quality Agreement/Progress Report
2008

Thank you for the invitation to comment on the above Progress Report on behalf of the members and directors of Citizens For Renewable Energy (CFRE) and its seven affiliated organizations comprising a membership of nearly 10,000 persons.

We have reviewed the Report, which touches on many air quality issues and shows some signs of progress.

CFRE submitted comments on the 2006 Air Quality Agreement –Progress Report (Feb.21/07, copy attached) and pointed to the omission of addressing the large number of emissions from electricity generating plants using nuclear fission – nuclear reactors – 33 of them in the Great Lakes Basin.

We called for those sources to be monitored, evaluated and to be reported on.

There was no mention of it in this latest report!

We are very concerned that these huge pollution sources are not addressed due to the industry's argument that the reactors don't emit Greenhouse Gases (GhGs).

CFRE pointed to the Bruce Nuclear Plant, the largest nuclear facility in North America, if not the world, where four of the old reactors are being refurbished, two of them getting a complete overhaul with large sources of GhGs being emitted. Also mentioned was the large incinerator on the site, again one of the largest in North America, burning low-level irradiated waste from all the 20 reactors in Ontario 24/7, emitting large amounts of particulate matter and dioxin into the air and water.

With Particulate matter pollution finally being addressed it must be mandatory that these point sources are monitored and reported on.

With several applications for new reactor build projects on both sides of the border on Lake Huron, Lake Erie and Lake Ontario there are top level environmental assessments being conducted. CFRE is participating in the Panel Review EA on Bruce Power's proposal and has knowledge of NOx and VOC emissions being admitted to by the proponent(attaching a listing of Significant Discovery Reports (SDRs)).

The technological processes taking place at any Nuclear Power Plant take as a given that the surrounding atmosphere will systematically be receiving radionuclide discharges as well – products of nuclear fission and activation, radioactive noble gases like Krypton-85, radioactive iodine and tritium.

Why are these long-lived carcinogens not included and addressed? Are nuclear electricity generating plants excluded from being monitored? The IJC Nuclear Taskforce clearly called for ongoing and increased monitoring because of their stark findings!

This Report does not meet the public expectations of disclosing ALL of the air emissions affecting human health!

All those air emissions are received by the Lakes and rivers, sources of drinking water for millions of people!

The report mentions on page 17 that the Ontario government has been engaged in a number of clean energy projects to offset coal-fired electricity generation. The amount of renewable energy to be acquired will double to 4,000 MW. What is the target date for this badly needed clean and SAFE energy production?

There needs to be a major effort through the very recently introduced Green Energy Act (Bill 150) to reach that target within a short timeframe!

On the same page it is quoted: “Canada intends to monitor the application of these criteria [in the Green Power Guideline] as an indicator of improvement in the environmental performance of electricity generation and distribution. Canada intends to review and update these criteria to promote continuous improvement in the environmental performance of this industry.”

The federal government just recently has cancelled a number of initiatives which were to enhance the environmental performance of the renewable energy industry.

It is high time that the IJC puts strong pressure on the Parties that non-polluting energy generation sources have to be developed quickly with effective government regulations and incentives to replace aging facilities of conventional, polluting power generation!

Thank you for the opportunity to provide comments on this Progress Report.

Submitted on behalf of the members and directors of Citizens For Renewable Energy (CFRE) and its affiliated organizations.

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