

The Canadian Environmental Assessment Agency

160 Elgin Street,

Ottawa, Ontario

K1A 0H3

November 19th, 2008

Regarding: Darlington New Nuclear Power Plant Project, Draft Environmental Assessment Guidelines

The National Council of Women of Canada (NCWC) representing hundreds of thousands of Canadians, has long standing concerns regarding nuclear power, particularly with respect to its inherent dangers to the environment and public health and safety.

Using policy developed in response to the ongoing and accelerating problems with nuclear power since 1955, NCWC has presented many briefs to governments and to relevant agencies, boards, and commissions. In these NCWC has stressed the significant role regulatory and assessment bodies play in protecting the public and environment , as well as, the absolute necessity of making the *'precautionary principle'* an integral, over-arching determinant factor when making decisions on nuclear power that could so heavily impact on Canadians now and in the future .

For instance, in commenting on CNSC's Draft Regulatory Policy P-290, Managing Radioactive Waste in 2003 , NCWC stated that it *"considers the Canadian Nuclear Safety Commission to be the paramount line of defense in ensuring the health and safety of Canadians"*

And, in 2006, NCWC in commenting on CNSC's examination of the potential for *'The Elimination of 'Insignificant 'Nuclear Projects,'* stated that. *"An environmental assessment allows for close scrutiny of the risks involved and acts in a precautionary way to ensure public health and safety as well as macro-environmental integrity."*

Unfortunately, the Draft Environmental Assessment Guidelines for the Darlington New Nuclear Power Plant Project, fail to live up to NCWC expectations in many ways, particularly that of reflecting the *'precautionary principle.'*

NCWC finds it quite unacceptable, that the proponent , Ontario Power Generation, is not expected to thoroughly consider and describe in detail the many potential life-cycle impacts, and costs, of its nuclear power plant proposal, such as radioactive nuclear plant releases to water, air and land; the cumulative

build up of radioactivity in soils; the risk of terrorist acts and accidents; and, the risks posed by waste management on-site.

NCWC is also concerned that this is the first 'new' nuclear plant proposal in over twenty five years and these guidelines for review may well set a precedent for future requests. Therefore, how the project is reviewed is extremely important and there is a public expectation that the CNSC/Ministry of Environment Review Panel, as well as the Canadian Environmental Assessment Agency, the Ministry of Environment and the CNSC will be most diligent in ensuring public and environmental protections.

NCWC also draws to your attention that this project is moving ahead of power planning in Ontario, as the Ontario Power Authority's Integrated Power System Plan (IPSP) Hearing before the Ontario Energy Board was halted in mid-September by the Minister of Energy, in order for the OPA to thoroughly determine the amount of energy conservation and renewables that could be added to the Plan.

The final IPSP may indeed include less nuclear power and it is not unrealistic to consider the possibility that the Ontario Energy Board may cut back the potential for nuclear power supply, given its extraordinarily high costs, versus those of renewable sources and conservation. In this regard, NCWC feels it would be reasonable for OPG to be required to most thoroughly review all of the potential life-cycle costs.

To conclude, National Council of Women of Canada urges the Canadian Environmental Assessment Agency to ensure that its guidelines for the Darlington nuclear plant project reflect the precautionary principle through very strict review requirements of OPG. This is what the public expects of this regulatory body and what it deserves, so that the health, safety and environment of Canadians are protected, now, and over hundreds of years to come.

Sincerely,

Karen Dempsey President NCWC

Prepared with the assistance of Gracia Janes, NCWC VP, Environment

Background :

The National council of Women of Canada (NCWC) is a non-sectarian, non partisan federation of voluntary organizations, whose goal is to improve the quality of life for women and society. NCWC was founded in 1893 and has played a leading role in many of the milestones reached in Canadian social history. Responding to a variety of interests embraced by its affiliates, NCWC has been a leader in presenting developing issues to the government. From

women's equality, to children's rights, public health reforms, national parks and inner city playgrounds, environmental and consumer protection, to citizenship and work, concerns of the NCWC have been wide-ranging and its influence far reaching. For more information, consult our web site at www.ncwc.ca. NCWC's head office is at 205-251 Bank Street, Ottawa, Ontario K2P 1X3.