

THE PROVINCIAL COUNCIL OF WOMEN OF ONTARIO (PCWO)

Established 1923

**Comments on the International Joint Commission (IJC) Draft Report on its
First Triennial Assessment of Progress on the**

GREAT LAKES WATER QUALITY

Presented to the International Joint Commission on the Great Lakes (IJC)

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**Presented by Ann Porter Bonilla, Environment Convenor, Niagara District Council
of Women**

Prepared by Gracia Janes, VP Environment PCWO

The Provincial Council of Women of Ontario (PCWO) is pleased to have this opportunity to comment once more on the state of the Great Lakes /St. Lawrence River Basin.¹ on behalf of the thousands of Ontarians belonging to our 'Federated' Member Organizations. ²

It is very important to PCWO that the Commission has committed to include the results of extensive public engagement along with science-based assessments, in its "*Draft First Triennial Assessment of Progress on the Great Lakes Water Quality*". Both these elements will enhance the ability of the Commission to provide strong direction to the United States and Canada i.e. the "*Parties*", on a way forward that "*further strengthens Great Lakes protection and restoration.*"

It is also encouraging, particularly to those of us living within the Great Lakes watershed, that the draft report cites the excellent bi-national research undertaken on groundwater issues. We note that PCWO urged the Government of Ontario to make the latter a priority as early as 1997, and it was a subject of PCWO input to the Great Lakes Annex 2001 Treaties public meetings.

Nonetheless, as the Commission has "*invited us to a vigorous debate*", PCWO cannot help but draw its attention to the ever growing public and expert concerns around the looming nuclear threats to the Great Lakes and the extensive 1997 IJC Nuclear Task

Force report which warned of the lack of data available on radionuclide releases, and the potential impact of radionuclides on the ecosystem.

Twenty years later, there appears to be no sign of a remedy. For although the 2012 Protocol Amending the Great Lakes Water Quality Agreement Between Canada and the United States of America, references radionuclides in the “*Implementation*” of programs and “*Measures*”, as well as “*Notification and Response of the Parties*,” since then the Nuclear Task Force has been inactive, there has been no further research done, and despite the urging of many groups including the Provincial Council of Women of Ontario, radionuclides are not listed as “*a chemical of mutual concern*.”³

It is also true that the Parties have been incredibly slow in designating and making bi-national plans for other “*chemicals of mutual concern*” in the Great Lakes. As the Commission’s summary introduction to these public meetings states, “*Significant challenges include the slow pace in addressing chemicals of mutual concern...*”. Nevertheless, for radionuclides to not be on the IJC’s radar/agenda at all should be of grave concern to those millions of people living, working and relying on the Great Lakes for multiple reasons, the most significant being clean potable water and public health.

The public and their political representatives have been speaking out loud and clear for several years about the long-standing threats from multiple nuclear sources. For instance:

- 38 nuclear plants (as of 2013), many of them aging, leaking, deteriorating, and some of them, such as the Pickering plant, (sited over a geologic fault line on the shores of Lake Ontario) being well past their life span
- the proposed nuclear dump near the shores of Lake Huron
- the planned, precedent-setting and needless transport of highly dangerous and extremely long lasting liquid nuclear waste containing highly enriched Uranium (HEU) on highways, through communities and crossing multiple rivers and bridges on both sides of the border as it travels from Chalk River near Ottawa to South Carolina .

To conclude, the Provincial Council of Women of Ontario urges the Commission to recommend strongly to the “*Parties*” that radionuclides be declared a “*chemical of mutual concern*”. We also ask that the research which is based on the gaps in scientific knowledge identified by the Nuclear Task Force begin as soon as possible. This should be part of an initiative to make up for lost time as part of a bi-national plan to address the grave and growing public concern with the strong action needed to protect the Great Lakes from nuclear threats.

BACKGROUND:

1. Examples of Previous PCW and NCWC Interventions and Comments to Government:

* **Summer 2005**- Meetings re Draft Great Lakes Charter Annex Agreements in Niagara Falls and Windsor

* **August 2005** PCWO letter to Province of Ontario, using National Council of Women of Canada Policy that: *“ NCWC urge the Government of Canada to a) support the Great Lakes Water quality Agreement , its 1978 and 1987 Protocol commitments and annex2 Commitments on Remedial Action Plans for Areas of concern, through funding and strong legislation and enforcement , and strengthen the Agreement through new Protocols where necessary b) fund and support with legislation, the development of comprehensive long term plans to fulfill the vision of the Great Lakes Water Quality Agreement for a clean and healthy Great Lakes ecosystem and, c) act swiftly upon the International Joint commission’s recommendations to protect the Great-Lakes St. Lawrence river from invasive species ..”*

2. List of PCWO Member Federates LOCAL COUNCILS

STUDY GROUP

London & Area Council of Women Oakville & Area
Ottawa Council of Women
Niagara District Council of Women
Toronto & Area Council of Women

PROVINCIALY ORGANIZED SOCIETIES

Association of Early Childhood Educators-Ontario
Business and Professional Women’s Clubs of Ontario
Elementary Teachers Federation of Ontario
Federated Women’s Institutes of Ontario
Ontario English Catholic Teachers’ Association
Ontario Dental Hygienists’ Association
Ontario Home Economics Association
Polish Women’s Federation
Ukrainian Women’s Federation

3. Quotes from Letter of March 2nd, 2016 from 110 groups including PCWO and NCWC, to the Ontario Region U.S. Environmental Protection Agency Environment and Climate Change Canada Region 5, Re: *‘The Nomination of Radionuclides as a Chemical of Mutual Concern under the Great Lakes Water Quality Agreement* “ *The undersigned environmental groups urge the Canadian and US federal governments to jointly designate radionuclides as Chemicals of Mutual concern, according to their responsibility in Annex 3, Part B, Sec.2 of the Great Lakes Water Quality Agreement 2012” ...This recommendation is based on our following findings: * Radionuclides can have very serious immediate , long term and inter-generational effects on human and non- human health *There is no level of radionuclides below which exposure can be defined as ‘safe’*” *” *The large number of facilities around the Great lakes Basin, usually near the shoreline, result in ongoing regular discharges into the lakes as well as a high probability of accidents that release higher amounts of radionuclides ..” * “This large number of facilities near the shores of the Great Lakes means a high likelihood of radioactive materials being transported on the lakes or across rivers that connect the Great Lakes, with the potential for spills during transportation, as well as loading and unloading....”*