



July 22, 2026

Port Hope Community Health Concerns Committee
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Response to engagement@pco-bcp.gc.ca

1. Comments from the Port Hope Community Health Concerns Committee.

As the Canadian site since the 1930's of radium extraction from uranium ore, uranium refining, processing, conversion and nuclear fuel rod production,, the community of Port Hope, Ontario has one of the longest and most troubled relationships with the actions and decisions of the federal regulator of the nuclear industry in Canada which has placed the people in harm's way for decades.

The Port Hope Community Health Concerns Committee strongly objects to the federal government's Discussion Paper proposal for the federal nuclear regulator, the Canadian Nuclear Safety Commission, to be solely responsible for conducting environmental assessments, decision-making, licensing, monitoring and accountability for nuclear projects and operations in Canada. Approving this proposal would be a betrayal of the rights of the people of Port Hope, First Nations and all communities impacted by the nuclear fuel cycle in Canada to be the highest priority in unbiased, independent, thorough, inclusive and public evaluations of such high risk projects.

CNSC Regulations (REGDOC-2.7.4 Radiation Protection Program) "require licensees to implement measures to keep the effective dose and equivalent dose received by and committed to persons As Low As Reasonably Achievable or ALARA, taking into account social and economic factors". In our reality the application of ALARA by the CNSC in its analysis and licensing decisions, enables nuclear industries to continue operating at the expense of people and the local environments in which they are situated. Examples include:

- Two CNSC licensed Cameco facilities are licensed currently to operate in the middle of Port Hope neighbourhoods with daily radioactive, heavy metal and chemical emissions to air, soil and water (Lake Ontario, Ganaraska River) without buffer zones which CNSC does not require despite its Precautionary Principle.
- There is a CNSC licensed federal \$2.6 billion remediation of 1.2 million cubic metres of radioactive wastes ongoing all around Port Hope conducted by licensees AECL/CNL.

- CNSC has refused to require and fund independent ongoing health monitoring of the people despite repeated requests by our Committee and others. Health study results deserving of followup (1983, 1997, 2000, 2002, 2007) are ignored or dismissed.
- Yet, CNSC states in its 2023 licensing decision for Cameco Fuel Fabricating Facility that the health of the people of Port Hope is protected, with no supporting evidence.
- CNSC then approved a new 20 year license which allows individuals 10 minutes every 20 years at hearings to intervene directly and unfortunately pointlessly, to the CNSC.

It is our submission based on extensive community experience with AECB/CNSC decisions that the proposal for the federal regulator of the nuclear industry also to have sole authority for environmental assessments and decisions is a conflict of interest and entirely counter to the public interest. The proposal should not be approved.

“However, the Discussion Paper proposals are inconsistent with strong and robust environmental protection that ensures the health of current and future generations and that does not repeat the mistakes of the past.”- CELA 2026

We fully support the Brief submitted by the Canadian Environmental Law Association with Part V - Conclusions and Recommendations included below.

2. PHCHCC Support for CELA’s Brief to the Government of Canada, (June 2, 2026)

SUBMISSIONS BY THE CANADIAN ENVIRONMENTAL LAW ASSOCIATION TO THE GOVERNMENT OF CANADA REGARDING “GETTING MAJOR PROJECTS BUILT IN CANADA – DISCUSSION PAPER ON PROPOSED LEGISLATIVE, REGULATORY AND POLICY REFORMS - Prepared by Richard D. Lindgren, CELA Counsel June 2, 2026

- Excerpt Pages 20- 21:

PART V – CONCLUSIONS AND RECOMMENDATIONS For the foregoing reasons, CELA concludes that the Discussion Paper proposals are highly problematic, unsupported by persuasive evidence, and contrary to the public interest. In our view, if the Government of Canada is committed to assessment and permitting regimes that are credible, robust, efficient, evidence-based, and participatory, then the Discussion Paper proposals are unacceptable and cannot proceed in their current form. At best, the Discussion Paper amounts to wishful thinking by the Government of Canada about desired outcomes (i.e. speedier approvals and timely construction), and it does not constitute a carefully constructed and reasonably detailed action plan for reforming federal assessment and permit processes. “Accordingly, CELA recommends that the Government of Canada should not proceed with the unjustified and regressive changes proposed in the Discussion Paper, and that Parliament should not “quickly” introduce or enact legislation to implement these changes. To the contrary, the Government of Canada should immediately reconsider the proposed changes and re-focus its reform agenda away from speeding up federal processes, fast-tracking contentious mega-projects despite adverse impacts upon areas of federal jurisdiction, and limiting or removing environmentally significant

projects from robust, credible and participatory federal review processes. Instead, the Government of Canada should develop, with meaningful public and Indigenous consultation, an appropriate suite of reforms which actually strengthen – not rollback – environmental safeguards incorporated within existing federal environmental laws duly enacted by Parliament. In making this submission, CELA wishes to reiterate that we do not oppose economic activity, good jobs, or sustainable resource management. Moreover; as a legal aid clinic, CELA strongly supports measures that reduce poverty and increase resilience, especially in remote, rural, northern and Indigenous communities. However, the Discussion Paper proposals are inconsistent with strong and robust environmental protection that ensures the health of current and future generations and that does not repeat the mistakes of the past.”

Respectfully submitted for consideration.

Faye More
Chair on behalf of the
Port Hope Community Health Concerns Committee
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