



The Council of Canadians welcomes the opportunity to share comments on the Uranium Development Partnership (UDP) report, *Capturing the Full Potential of the Uranium Value Chain in Saskatchewan* as part of government of Saskatchewan's public consultation process.

Founded in 1985, the Council of Canadians is a national organization with members and volunteer chapters across the country. We work to protect community and social interests by promoting progressive policies on fair trade, clean water, energy security, public health care, and other issues of social and economic concern to Canadians.

On mining, our organization advocates for policy that is in line with the principles of sustainable development including economic development and prosperity, environmental protection, and the protection of social systems and human rights. Uranium mining is an issue of special interest to our organization given the significant public health and water contamination risks and other social and environmental consequences associated with all stages of the mining process. Council of Canadians' chapters across the country, including those in Saskatchewan, have actively opposed uranium mining by organizing public events, collecting signatures for petitions, and supporting legislative moratoriums and bans. Our members and chapter representatives have also participated in recent public consultation meetings.

The Council of Canadians does not support the broad direction of the Uranium Development Partnership (UDP) whose mandate is to identify opportunities to further develop the uranium value chain in the province. Our organization calls on governments to support provincial and territorial moratoriums (leading to a ban) on uranium exploration and mining. We also oppose further expansion of nuclear power in our country.

Uranium exploration and mining; Upgrading

In recommending measures that will see further development related to the uranium industry, including more uranium exploration and mining¹ and long-term potential for an enrichment facility in the province², the UDP report fails to appreciate the serious consequences of uranium development.³ Drilling and other exploration methods, as well as preliminary stripping and trenching, can release cancer-causing radon gas and other radioactive materials into the air, watersheds or groundwater. Following exploration, uranium mining and milling leaves behind dozens of toxic and radioactive components, and common methods of waste storage have been vulnerable to seepage and spontaneous containment failure, not to mention earthquakes and other natural and man-made disasters. Solid radioactive fallout gets into the food chain through contaminated soil, fish and animals, increasing the likelihood of disease in living creatures. Radioactive for thousands of years, the uranium waste leaves a toxic legacy for generations.

In addition to the water contamination risks of uranium exploration, the byproducts of uranium in the mining waste can also leach into and contaminate nearby watersheds and ecosystems. Uranium

refining and enriching facilities also have the potential to seriously contaminate nearby land and water sources.⁴ Effluent from uranium mines and mills is now classified as toxic by the Canadian Environmental Protection Act. The Council of Canadians, with MiningWatch, made public a report drafted by Environment Canada in December 2007 revealing that the agency had documented crucial information regarding the looming freshwater crisis in Canada.⁵ The Environment Canada report highlights the myth of abundance of freshwater in Canada and emphasizes that only one per cent of Canada's total water supply is renewed annually. The reality of water contamination caused by uranium mining must be evaluated within the context of a looming freshwater crisis. There would be serious public health consequences should drinking water sources be contaminated. The report also recommends to "work with the Federal Government to establish clear parameters and accountabilities for the duty to consult with First Nations and Métis communities." Engaging with Aboriginal communities should be the first priority for any developments on Aboriginal land. This includes respecting rights to Free Prior and Informed Consent, as described in the United Nations' Declaration on the Rights of Indigenous Peoples,⁶ for all stages of uranium exploration and mining, should respect rights to Free Prior and Informed Consent.

Canada is the world's largest producer of uranium, with much of it coming from Saskatchewan. About 80 per cent of uranium mined in Canada is exported, and a substantial portion of this is used for nuclear power production in the United States. As demand for uranium ore increases in the United States and around the world there will be more pressure to allow companies to mine it. Prime Minister Steven Harper's intentions on weakening foreign investment rules for uranium mining – rules developed because uranium mining poses particular safety concerns and can be used to make nuclear fuel and weapons – will lead to more foreign investment and more uranium mining in Canada.⁷ The short-term economic benefits uranium mining may produce do not outweigh the long-term devastation it brings to the environment, local waterways and people's health.

Power Generation; Used fuel management

The UDP report recommends, "including nuclear as part of the Province's long-range energy mix ..." The Council of Canadians opposes nuclear power because it poses an unacceptable risk to people and the environment. Nuclear power is not clean, safe, peaceful, or economically viable.

Nuclear power is not a viable solution in responding to the urgent need to address climate change, construction requires a long period of time and there is a carbon footprint associated with building and eventually decommissioning plants as well as with uranium mining. There are significant environmental impacts with nuclear power generation, including requiring large amounts of water and potential water contamination. Nuclear power results in nuclear waste, which creates long-term storage and contamination concerns, which have yet to be sufficiently addressed. There are also health risks to workers and communities surrounding nuclear power industries, and the potential for an accident at a nuclear facility could cause devastating consequences to the environment and human health. Nuclear power generation is also extremely expensive. It requires significant public spending and there is a history of delays and cost overruns of nuclear power projects in Ontario.⁸

The Council of Canadians is opposed to the further expansion of nuclear power in our country. Faced with climate change and diminishing energy resources globally, we recognize the need for a just transition away from being a fossil fuel and nuclear dependent society, while ensuring that Canadians have access to basic energy needs, to sustainable, publicly funded and publicly delivered energy alternatives that benefit both workers and their communities.

Powering the tar sands; NAFTA

The UDP report suggests building nuclear capacity in Saskatchewan for export purposes: “Saskatchewan will require 1,200 to 1,750 MW of new power generation capacity for its domestic use by 2020....Initial examination suggests that up to approximately 3,000 MW of nuclear capacity could be constructed to meet Saskatchewan’s power needs and capture *export opportunities* [emphasis added].” In reference to Alberta power needs predicted to be between 4,000 to 5,000 MW of new power by 2020, “Saskatchewan is well-positioned to provide low-carbon emission power to fill this looming supply gap.”⁹


In considering potentially powering tar sands operations in Alberta, it is prudent to consider the implications of helping to power this industry. Producing more than one million barrels daily with plans for significant expansion (which have been delayed, but not abandoned as a result of the economic crisis), Alberta's tar sands are the fastest growing source of greenhouse gas (GHG) emissions in the country. Nearby First Nations communities have raised concerns over unusually high cancer rates and the lack of recognition of aboriginal title and treaty rights. The mining process destroys large tracts of boreal forest, often referred to as the lungs of our planet. On average, two to five barrels of water are needed to produce one barrel of oil and large amounts of toxic water are stored in massive tailings ponds (according to a report from Environmental Defence, these “ponds” leak 11 million litres of contaminated water daily). These impacts are the result of an export oriented energy gold rush in the tar sands. While half of current production is exported to the U.S., we continue to experience the very real social, environmental, health and ecological impacts here in our communities.

These “findings” and the development of Alberta’s tar sands reflect a broader trend in Canada for export-oriented energy developments, which raises a number of serious social and environmental concerns. Trade rules limit the capacity of Canadian governments to intervene in energy trade – even with respect to ensuring energy security or protecting the environment – except in extraordinary circumstances. In addition to placing significant limits on import and export restrictions, NAFTA's proportional sharing obliges Canada to continue exporting energy to the U.S. in the same proportion of total supply sold over the three previous years. NAFTA's notorious Chapter 11 acts both preventively as well as punitively in undermining strong environmental and labour standards. It allows corporations to sue member governments for compensation in secretive trade tribunals over almost any state measure that impacts predicted profits. For example, DOW Chemical is currently challenging Quebec's pesticide ban, and ExxonMobil announced in 2007 its intention to bring forward a lawsuit over requirements for research and development and local employment in the Newfoundland offshore oil industry.

Conclusion:

The Council of Canadians thanks the Saskatchewan government for this opportunity to present our views on uranium mining and nuclear power as related to the UDP report. We urge the Government of Saskatchewan to seriously examine the consequences of uranium exploration and mining and support a moratorium (leading to a ban) on uranium exploration and mining. We also urge you to not heed the recommendations of the UDP report to consider the inclusion of nuclear power in the province's energy mix. There are viable alternatives for meeting Saskatchewan's energy needs. This includes prioritizing energy conservation and efficiency measures and a significant expansion of publicly funded and delivered energy alternatives (employing renewable energy sources such as wind and solar). There is a significant and growing body of evidence around the possibilities for vastly improving in these areas, helping to maintain and create jobs and income levels that are vital to social stability.¹⁰ There are also opportunities for Saskatchewan to purchase surplus low emission power from Manitoba's existing public hydroelectric facilities.

Sincerely,

A handwritten signature in cursive script that reads "Andrea Harden-Donahue".

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¹ This includes measures such as maintaining the current claim-staking system, expanding program incentives for exploration and changes to the royalty system that will increase private profits. *"Capturing the full potential of the uranium value chain in Saskatchewan"*, UDP, March, 2009, p. 5.

² Here, we are referring to the recommendation to, "target the next generation of enrichment technology (laser isotope separation) and enter into discussions with current technology developers to determine the conditions under which a commercial-scale facility could be attracted to the Province within 10 to 15 years." *Ibid.*, p.6.

³ Mark Winfield, et al., *"Nuclear Power in Canada: An Examination of Risks, Impacts and Sustainability,"* Pembina Institute, December 2006, p.24-34., Lynn Daniluk, "Saskatchewan uranium expert brings warning to eastern Ontario, western Quebec," *The Canadian Press*, January 23, 2008

⁴ One such example is the seepage of material from the Cameco Port Hope conversion plant into nearby soil and ground water. *"Cameco restarts Port Hope conversion plant after December shutdown,"* *The Canadian Press*, June 17, 2009, <http://www.google.com/hostednews/canadianpress/article/ALeqM5iBodEbOMUircxT6FWrHwhSgr923A>

⁵ "Groups make public an unreleased government report on water crisis in Canada," October 6, 2008, <http://canadians.org/media/water/2008/06-Oct-08.html>

⁶ The United Nations Declaration on the Rights of Indigenous Peoples was adopted as a universal human rights standard by the UN General Assembly on September 13, 2007 and endorsed by the Canadian Parliament on April 8, 2008.

⁷ Bruce Champion-Smith, "Harper would relax foreign ownership rules," *The Toronto Star*, September 12, 2008.

⁸ For more information expanding on these points, please refer to: Mark Winfield, et al., *"Nuclear Power in Canada: An Examination of Risks, Impacts and Sustainability,"* Pembina Institute, December 2006, Executive Summary., Jim Harding, "UDP Report," <http://www.saskuranium.ca/Default.aspx?DN=79a70c20-93f3-45c0-a91b-9182fd4b61cf&l=English>

⁹ *"Capturing the full potential of the uranium value chain in Saskatchewan"*, UDP, March, 2009, p. 55.

¹⁰ For examples, refer to the following resources. Jeff Bell and Tim Weis, *"Greening the Grid: Powering Alberta's Future with Renewable Energy,"* Pembina Institute, January 2009., <http://pubs.pembina.org/reports/greeningthegrid-report.pdf> "Global Green New Deal Policy Brief," United Nations Environment Programme, March 2009., http://www.unep.org/pdf/A_Global_Green_New_Deal_Policy_Brief.pdf Sven Teske and Dave Martin, ed., Chrispin Aubrey, *"Energy Revolution: A Sustainable Canada Energy Outlook,"* Greenpeace International and European Renewable Energy Council, <http://www.greenpeace.org/raw/content/canada/en/documents-and-links/publications/energy-revolution-report-2009.pdf>