



## Memorandum

To: Mayor John Tory and Executive Committee Members  
City of Toronto

Date: November 30, 2015

From: Theresa McClenaghan  
Executive Director, Canadian Environmental Law Association

Re: EX. 10.37 Darlington Nuclear Generating Station Licence Renewal,  
Toronto's Emergency Response, and International Best Practices

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CELA writes this memo in support of our deputation to your December 1 2015 meeting at which you will consider the above noted item. CELA recommends that you support this motion as an important initiative for public safety.

Under the Province of Ontario's Emergency Management and Civil Protection Act and regulations, all municipalities containing a nuclear power plant "primary zone" (the designated municipalities under the provincial nuclear emergency response plan) must have a municipal nuclear emergency plan. The emergency measures that could be required in the event of a nuclear accident are to be spelled out.

Currently municipal nuclear emergency plans are based on the provincially established "planning basis" (also called the "reference accident" in other jurisdictions). Unfortunately the current "planning basis" in Ontario was chosen before both the Chernobyl nuclear accident in 1986 and the Fukushima nuclear accident in 2011 and on the basis that no large accidents had occurred to that point. It has not been revised since the early 1980s.

CELA has undertaken in depth reviews of the provisions of Ontario's provincial and municipal nuclear emergency plans for successive hearings before the Canadian Nuclear Safety Commission and EA hearings for the Darlington, Pickering, and Bruce nuclear power plants since 2011. In 2013 the Minister of Community Safety advised us that there would be a public review, which has not occurred to this point.

We were very pleased that the federal safety regulator required pre-distribution of potassium iodide in the primary zone before the end of 2015. However CELA's opinion, based on the detailed reviews we have conducted, is that nuclear emergency planning in Ontario is not adequate. In particular the size of the primary zone must be re-examined, and detailed evacuation planning, KI distribution zones, and food and water provisions to name just a few of the critical issues, are all inadequate in terms of planning, resources, and public communication. Furthermore, transparency and public input as to the decisions of the province about nuclear emergency planning and readiness is critical.

We therefore support the motion before you today and will be very pleased to provide additional information during our deputation and at any other time that we can be of assistance.

**Canadian Environmental Law Association**

T 416 960-2284 • F 416 960-9392 • 130 Spadina Avenue, Suite 301 Toronto, Ontario M5V 2L4 • [cela.ca](http://cela.ca)