

April 17, 2016

Memo to: Mayor J. Tory and Members of City of Toronto Executive Council  
Care of: Jennifer Forkes  
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Sent by email: [exc@toronto.ca](mailto:exc@toronto.ca)

From: Theresa McClenaghan, Executive Director and Council, Canadian Environmental Law Association

**Re: Support for Office of Emergency Management Report (EX 14.9 to the Executive Council meeting of April 18, 2016)**

CELA is pleased to provide the following recommendations to Executive Council in response to the above-noted report on the topic of Nuclear Emergency Planning within the City of Toronto.

CELA has conducted extensive analysis of emergency planning regulatory requirements and readiness at the various commercial nuclear power plants operating in Ontario, and has presented these findings to the Canadian Nuclear Safety Commission as we noted in our prior correspondence to you on this matter.

We note several important items included in Ex 14.9:

- That the Pickering Nuclear Generating Station is 5 km from the City of Toronto's boundaries
- That all of the City of Toronto falls within 50 km of the Pickering Nuclear Generating Station (the current secondary zone) and a portion of the City falls within 50 km of the Darlington Nuclear Generating Stations
- The current provincial nuclear emergency plan does not contemplate "an event on the scale of the nuclear accident at Fukushima."

Your staff report advises that the city supports an open consultation process and "staff will encourage an open consultation process at every opportunity." This is important since this year the province of Ontario is planning to review the provincial nuclear emergency plan and the planning basis (i.e. the size of nuclear accident to be prepared to respond to.) The staff report concluded saying "a thorough review of the available evidence is needed to establish policies that are appropriate to the Ontario context."

CELA agrees with this latter statement; however, we note that the current nuclear emergency planning basis, and the size of the primary zone for emergency response at 10 km in Ontario, is

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arbitrary and is not based on evidence. Given the experiences at Chernobyl 30 years ago and Fukushima 5 years ago, a credible evidence basis is critical. Furthermore, public input as to the level of protection to be provided; the size of the planning zones, and the measures to be taken in response to a large nuclear accident are also essential. The International Atomic Energy Agency has noted that without this type of public input, there is little trust in what authorities would tell the public to do in the wake of a nuclear accident.

The City of Toronto itself has a large stake in this matter. It contains the largest population located so near to a major commercial nuclear power reactor anywhere in the world. The City is expected under provincial legislation to maintain a nuclear emergency response plan, and to have the capability to respond with evacuation, provision of shelter, emergency notification and much else. Furthermore, the City of Toronto supplies its millions of residents with drinking water from Lake Ontario, on which both the Pickering and Darlington nuclear generating stations are located, and so far, there is no drinking water contingency plan in the event of a large nuclear accident at one of those plants.

Accordingly, CELA recommends the following:

1. That the City of Toronto seek public input at a public meeting of Toronto's residents with respect to the City of Toronto's response to the expected upcoming Province of Ontario consultation on the new provincial nuclear emergency plan;
2. That the Executive Committee request that City staff report back to Executive Committee on the City's proposed response to the province following consultation with Toronto residents;
3. That the Executive Committee request of its staff that the report outlined in item 1 above include specific recommendations as to how Toronto's municipal nuclear emergency response plan would be modified in respect of any proposed changes to the provincial nuclear emergency response plan including such matters as:
  - a. Location of nuclear emergency response headquarters for the City of Toronto
  - b. Coordination of evacuation of vulnerable communities including schools, long term care homes, seniors' homes, hospitals, and recreation facilities
  - c. Location of shelters and decontamination centres
  - d. Provision of transport for those lacking personal transportation to leave the evacuation zone
  - e. Plans for family reunification (such as school children with their parents)
  - f. Contingency Plans for provision of drinking water for the resident of Toronto in case of a large nuclear accident at Pickering or Darlington
4. That Executive Committee request its staff ask Ontario Power Generation to provide up to date evacuation studies for a 20 km zone with shadow evacuation to 30 km to City staff and the public, and that staff report back to Executive Committee on an evaluation of the current ability of the City to meet the requirements of evacuation within those

zones along with any necessary recommendations to ensure these responsibilities could be met.

CELA would be pleased to respond to any questions arising from the foregoing recommendations and to meet with you or your staff at any time.

CANADIAN ENVIRONMENTAL LAW ASSOCIATION

Per

Theresa A. McClenaghan