



May 13, 2016

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Regional Director General  
Ontario Region  
Environment and Climate Change Canada  
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Canada

Cameron Davis  
Senior Advisor to the Administrator  
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Re: Nomination of Radionuclides as a Chemical of Mutual Concern under the GLWQA

Dear Great Lakes Executive Committee Co-Chairs:

The Great Lakes and St. Lawrence Cities Initiative supports the nomination of radionuclides by the 110 organizations on March 2, 2016, as a chemical of mutual concern under Annex 3 of the Great Lakes Water Quality Agreement. With the number of operating and decommissioned nuclear power plants, uranium mining operations, spent fuel storage facilities, and uranium processing plants, there is a significant risk of radionuclides entering the waters of the Great Lakes.

Annex 3 provides a sound, systematic approach to determining the presence of the chemical of concern, the risk it might present, and actions that might be appropriate to deal with it. This is one of those situations where we can anticipate a potential problem before it becomes an emergency and take reasonable actions to reduce the risk.

Thank you for your consideration of our position.

Sincerely,

David A. Ullrich  
Executive Director