



**Committee of Advisors
to the
Great Lakes Fishery Commission**



August 5, 2016

Dear Mr. Goffin and Mr. Davis:

The Canadian and U.S. Advisors to the Great Lakes Fishery Commission are writing to urge you to designate radionuclides as a chemical of mutual concern under Annex 3 of the Great Lakes Water Quality Agreement. Please see the bottom of this page for a description of the role and make-up of the Advisors.

Attached is the resolution that we passed on this matter at the meeting of the Canadian and U.S. Advisors at the annual meeting of the Great Lakes Fishery Commission in Ottawa on June 9, 2016.

Radionuclides can have very serious immediate, long-term and intergenerational negative effects on human and non-human health, including that of fish, even at very low levels of exposure. In the Great Lakes basin, there are a large number of facilities that contain, use, store, and dispose of radionuclides for power generation purposes. Scientific studies have shown radionuclides accumulate in the internal organs and muscles of freshwater fish. New construction of additional facilities, extensions to and decommissioning of existing facilities throughout the Great Lakes basin pose further risk of additional radionuclides entering the ecosystem. The handling and storage of radioactive wastes at each of these facilities and proposals for new disposal sites near the Great Lakes add to the risks for the Great Lakes. Transportation of radionuclides on the Great Lakes and across rivers flowing into the Great Lakes is another major concern.

The Canadian and U.S. Committee of Advisors to the GLFC developed and discussed the attached resolution at the advisors' upper lakes meeting in Milwaukee on March 16, 2016, and at their lower lakes meeting in Niagara Falls, Ontario, on March 31. The refined resolution then went to the annual meeting of the advisors at the annual meeting of the GLFC in Ottawa on June 9, where it was passed.

The advisors urge the two federal governments to designate radionuclides as a "Chemical of Mutual Concern" under Annex 3 of the Great Lakes Water Quality Act, and to develop – with full involvement from the public – a binational strategy on radionuclides, which includes "research, monitoring, surveillance and pollution prevention and control provisions [as required by the GLWQA]." The resolution is attached to this memo and is also available at: http://www.glfc.org/staff/resol2016_2.pdf.

The opinions expressed here are those of the independent committee of advisors and not necessarily those of the Great Lakes Fishery Commission. The Committee of Advisors consists of both U.S. and Canadian representatives, from First Nation, commercial, recreational, academic, agency, and public fishery interests in the Great Lakes Basin. Advisors provide advice to the Great Lakes Fishery Commission; U.S. advisors are nominated by the State Governors, and appointed by the commission. Canadian advisors are nominated by the Ontario Minister of Natural Resources and appointed by the Minister of Fisheries and Oceans Canada.

More detail on the reasons why such a designation is essential for the well-being of the Great Lakes was presented in support of the request for designation that you received on March 2, 2016 from 110 environmental, health and other advocacy groups.

Thank you for your consideration of our resolution. Please contact us if you have any questions on this resolution. We look forward to working with you in the coming years on the development of a strategy for better understanding the impacts and threats of radionuclides in the basin and for taking action to lessen and prevent risks.

Sincerely,



Captain Denny Grinold
Chair
U.S. Committee of Advisors



Dr. Tom Whillans
Chair
Canadian Committee of Advisors

cc: United States GLEC Secretariat
Canadian GLEC Secretariat



**Committee of Advisors
to the
Great Lakes Fishery Commission**



**A RESOLUTION CALLING FOR RADIONUCLIDES TO BE DESIGNATED AS
A “CHEMICAL OF MUTUAL CONCERN”**

WHEREAS, the Great Lakes Water Quality Agreement (GLWQA) signed by the Canadian and U.S. Federal governments in September 2012 provides for the designation of substances that threaten the well-being of the Great Lakes as “Chemicals of Mutual Concern” under Annex 3 of the GLWQA;

WHEREAS, radionuclides can have very serious immediate, long-term and intergenerational negative effects on human and non-human health, including that of fish, even at very low levels of exposure;

WHEREAS, scientific studies in the Great Lakes basin and elsewhere have shown radionuclides accumulate in the internal organs and muscles of freshwater fish; a few examples: radionuclides are in fish flesh and bones at elevated levels in areas of greater human activity with radionuclides, e.g., the lakes near the former uranium mining operations near Elliot Lake, Ontario; fish have elevated genetic damage in areas with substantial radioactive contamination, e.g., near the Savannah River nuclear facilities in South Carolina, and fish from Chernobyl;

WHEREAS, there is a uniquely large number of major facilities around the Great Lakes basin containing, using, storing, and disposing of radionuclides for power generation purposes, including uranium mining and mine tailings, nuclear power reactors, waste sites, and uranium processing facilities, near the shores of the Great Lakes [see attached map]; this map does not include sites related to nuclear weapons activities in the U.S.;

WHEREAS, there are proposals for additional facilities or extension of the lives of existing ones, and whereas there is a proposal to build a deep geologic repository for low to medium radioactive wastes near Lake Huron, and currently a siting process underway for building a deep geologic repository, including possibly near Lake Superior or Lake Huron, for the highly radioactive used fuel bundles from all of Canada’s nuclear power reactors;

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WHEREAS, some of these facilities have been or are planned for closure or decommissioning but we do not have adequate plans for such activities, and these activities result in the on-going presence of radioactive wastes near the shores of the Lakes;

WHEREAS, these facilities result in on-going discharges into the lakes as well as presenting the possibility of accidents that could release higher amounts of radionuclides;

WHEREAS, this large number of facilities means the high likelihood of radioactive materials being transported on the lakes or across the rivers that flow into the lakes, with the potential for spills during transportation as well as during loading and unloading;

WHEREAS, the Great Lakes have characteristics that make them particularly susceptible to persistent toxic substances, and whereas some radionuclides persist for extremely long periods of time (for thousands and in some cases for millions of years), this means that the protective measures needed in the Great Lakes basin may be different than in an ecosystem with different characteristics;

WHEREAS, the International Joint Commission's Nuclear Task Force reported in 1997 that data available on releases and presence of radionuclides in the Great Lakes ecosystem and studies on impacts are inadequate to gain an understanding of the impacts of radionuclides on the ecosystem; and whereas, this situation has not improved over the past twenty years;

BE IT RESOLVED, that the Canadian and U.S. advisors to the Great Lakes Fishery Commission urge the Canadian and U.S. federal governments to designate radionuclides as a "Chemical of Mutual Concern" under Annex 3 of the Great Lakes Water Quality Agreement;

BE IT FURTHER RESOLVED, that the Canadian and U.S. advisors urge the Canadian and U.S. federal governments to develop, with full involvement from the public, a binational strategy on radionuclides, which includes "research, monitoring, surveillance and pollution prevention and control provisions" as required by Annex 3 of the GLWQA;

AND BE IT FURTHER RESOLVED, that the Great Lakes Fishery Commission urge the Canadian and U.S. governments to make the proposed designation and to develop a binational strategy with full public involvement to address radionuclides in the Great Lakes basin.

[attach Great Lakes Region Nuclear Hot Spots map.]

Passed by majority with two votes of opposition [36 present]

June 9, 2016

U.S. and Canadian Committee of Advisors