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**Written Closing Remarks from
Stop The Great Lakes
Nuclear Dump Inc.**

**Observations écrites finales de
Stop The Great Lakes
Nuclear Dump Inc.**

In the Matter of

À l'égard de

Ontario Power Generation Inc.

Ontario Power Generation Inc.

OPG's Deep Geological Repository (DGR)
Project for Low and Intermediate Level
Radioactive Waste

Installation de stockage de déchets radioactifs à
faible et moyenne activité dans des couches
géologiques profondes

Joint Review Panel

Commission d'examen conjoint

October 2014

Octobre 2014

Deep Geologic Repository Joint Review Panel

Closing Remarks by

Stop The Great Lakes Nuclear Dump Inc.

In the Matter of

Ontario Power Generation Inc.

Proposed Environmental Impact Statement
for OPG's Deep Geological Repository
(DGR) Project for Low and Intermediate
Level Waste

Stop The Great Lakes Nuclear Dump Inc.

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October 9, 2014

1. When our organization appeared before this Panel in October 2014 we indicated that Ontario Power Generation's selection of the proposed DGR site 1 km from the shore of Lake Huron is ill-conceived, non-compliant and controversial.
2. It is an undisputed fact that OPG did not consider any other sites, despite being required to do so under the environmental impact statement guidelines.
3. OPG told the Panel they did not consider an alternate site in the Canadian Shield, or anywhere, because OPG already had a willing host with the Municipality of Kincardine.
4. This is not good enough. One does not select a site to bury lethal radioactive nuclear waste because a town, who is being paid large sums of money by the proponent, says OK.
5. This Panel has heard from many citizens, environmental organizations and elected officials who are VERY concerned that the proximity of the proposed DGR to Lake Huron, one of our Great Lakes, creates a risk of contamination to these precious waters should the DGR fail in any respect to perform as planned.
6. Make no mistake - OPG is voluntarily choosing to place the Great Lakes at risk, despite the fact that these risks need not be taken with the largest source of surface fresh water on our planet.
7. Much like failed DGR's that have preceded this proposal, the scientific case that OPG has put before the panel is not providing any guarantee that this DGR will not fail. The current state of science cannot provide any guarantees and OPG is not stepping forward to provide any such guarantees.
8. Given the vast tracks of land within the ownership and control of the Province of Ontario (sole owner of OPG), it is clear that OPG could and should have investigated actual less populated sites, and sites outside of the Great Lakes Basin. They failed to do so. This is clear evidence of a lack of due diligence and failure to apply the precautionary principle.
9. OPG's evidence presented during these proceedings very clearly demonstrates that OPG did not gather evidence from citizens living outside of Bruce County concerning their acceptance of a DGR in the proposed Kincardine site location or any other location,

including potential locations in the granite of the Canadian Shield. At the closing of the public hearings, the extremely large gaping hole in OPG's information base concerning the issue of community acceptance remains unplugged.

10. The evidence before you clearly shows that OPG's plan is fatally flawed and that its significant deficiencies can never be remedied.
11. The overwhelming lack of social and community acceptance of OPG's plan is undeniable. OPG failed to undertake broad public consultation and gain acceptance for its plan. Over 70,000 concerned citizens have now signed the Stop The Great Lakes Nuclear Dump petition; **more than every man, woman and child living in Bruce County**. Resolutions opposing OPG's plan have been unanimously passed by the Michigan Senate and introduced into the US Senate and US House of Representatives. Numerous and continually increasing numbers of US and State Senators and Representatives are calling for a halt to this plan.
12. Yesterday on October 8, 2014 Cook County, Illinois unanimously passed a resolution opposing the proposed nuclear waste repository in Kincardine or any nuclear waste repository anywhere in the Great Lakes Basin. We have been advised that a copy of this resolution has been provided to the Joint Review Panel.
13. Cook County is the most populous county in the State of Illinois and is the second most populous county in the United States after Los Angeles County, California. Cook County has a population of 5.2 million citizens; more than 40% of all the residents of the state of Illinois. Its county seat is Chicago, the third most populous city in the United States.
14. Cook County's population is larger than that of 29 individual US states and larger than the combined populations of the seven smallest states. There are 135 incorporated municipalities partially or wholly within Cook County, the largest of which is Chicago, which makes up approximately 54% of the population of the county.
15. Therefore, as of October 9, 2014, 136 formal resolutions representing **16.3 million** people have now been duly resolved, voted on and passed by communities in Canada and the US all around the Great Lakes in opposition to the proposed DGR.
16. See Figure1 and Exhibit 1 for an updated map and list of communities that have passed resolutions opposing OPG's plan as of October 8, 2014.

17. Let there be no mistake. As outlined in the various written and oral submissions to this panel from numerous organizations, citizens and elected officials, OPG's plan is fatally flawed, deficient and non-compliant.
18. Moreover, OPG's plan has not passed the test of social acceptability.
19. The voices of opposition in Canada and the US are speaking out loudly and clearly saying NO to OPG's plan for a DGR in Kincardine, and NO to any DGR in the Great Lakes Basin.
- 20. Accordingly, it is clear that OPG's plan for the Kincardine DGR or any DGR in the Great Lakes Basin must be rejected.**

Figure 1

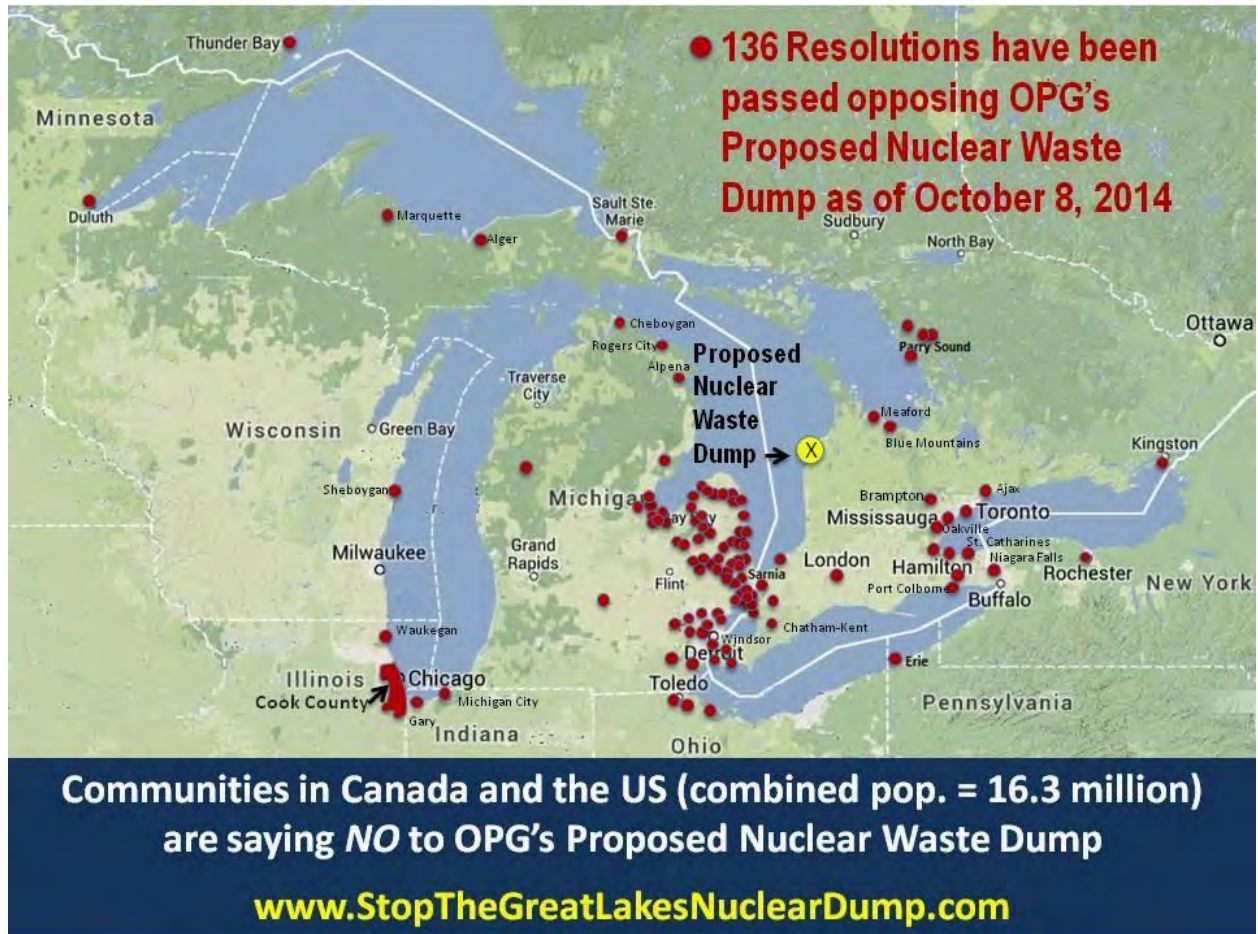


Exhibit 1

Resolutions Opposing the DGR

	<u>Date Passed</u>
CANADA - Ontario	
City of Burlington	29-Sep-14
City of Owen Sound	22-Sep-14
Municipality of West Grey	21-Aug-14
City of Meaford	28-Jul-14
City of Welland	06-May-14
City of Brampton	09-Apr-14
Municipality of McDougall	02-Apr-14
City of Port Colborne	10-Mar-14
City of Niagara Falls	03-Mar-14
McKellar Township	03-Mar-14
Municipality of Whitestone	27-Feb-14
Town of Parry Sound	18-Feb-14
Town of Grimsby	03-Feb-14
City of Thunder Bay	27-Jan-14
City of Sault Ste. Marie	20-Jan-14
City of St. Catharines	13-Jan-14
Municipality of Chatham Kent	13-Jan-14
Town of Ajax	25-Nov-13
City of Kingston	19-Nov-13
City of Windsor	18-Nov-13
City of Toronto	14-Nov-13
Town of Oakville	28-Oct-13
City of Mississauga	09-Oct-13
City of London	02-Oct-13
Town of Blue Mountains	16-Sep-13
City of Hamilton	11-Sep-13
City of Sarnia	09-Sep-13
Lambton County	04-Sep-13
Town of Kingsville	22-Jul-13
Essex County	17-Jul-13

Exhibit 1

Resolutions Opposing the DGR (Cont'd)

	<u>Date Passed</u>
UNITED STATES - Michigan	
Kingston Township	14-Sep-14
Casco Township	09-Sep-14
Wales Township	02-Sep-14
Arenac County	02-Sep-14
Vassar Township	02-Sep-14
Burnside Township	25-Aug-14
Denmark Township	25-Aug-14
City of New Baltimore	25-Aug-14
Marine City	21-Aug-14
Rogers City	19-Aug-14
City of Essexville	19-Aug-14
Clyde Township	19-Aug-14
City of Algonac	19-Aug-14
Village of Unionville	18-Aug-14
Burtchville Township	18-Aug-14
Hume Township	18-Aug-14
Lake Township	18-Aug-14
China Township	18-Aug-14
Township of Wells	14-Aug-14
Fremont Township	14-Aug-14
Village of Forestville	13-Aug-14
Emmett Township	13-Aug-14
Cottrellville Township	13-Aug-14
Riley Township	12-Aug-14
Sherman Township	12-Aug-14
Port Sanilac Village	12-Aug-14
Marathon Township	12-Aug-14
Bay County	12-Aug-14
Colfax Township	12-Aug-14
Merritt Township	12-Aug-14
Williams Charter Township	12-Aug-14
Cheboygan County	12-Aug-14
Village of Elkton	12-Aug-14

Exhibit 1

Resolutions Opposing the DGR (Cont'd)

	<u>Date Passed</u>
UNITED STATES – Michigan (Cont'd)	
Frankenlust Township	12-Aug-14
Greenwood Township	12-Aug-14
Village of Millington	11-Aug-14
Fraser Township	11-Aug-14
Almont Township	11-Aug-14
Grant Township	11-Aug-14
Berlin Township	10-Aug-14
Lapeer County	07-Aug-14
Village of North Branch	07-Aug-14
St. Clair County	07-Aug-14
City of Memphis	05-Aug-14
Sebewaing Township	05-Aug-14
Hampton Charter Township	04-Aug-14
City of Caro	04-Aug-14
Village of Capac	04-Aug-14
City of Bad Axe	04-Aug-14
Ira Township	04-Aug-14
Caseville Township	04-Aug-14
Columbus Township	02-Aug-14
Alpena County	29-Jul-14
Kawkawlin Township	28-Jul-14
Millington Township	28-Jul-14
Monitor Township	28-Jul-14
Brown City	28-Jul-14
Elba Township	28-Jul-14
Village of Peck	28-Jul-14
Village of Lexington	28-Jul-14
Paris Township	28-Jul-14
Village of Carsonville	23-Jul-14
Akron Village	22-Jul-14
City of Croswell	22-Jul-14
Village of Pigeon	21-Jul-14
Clay Township	21-Jul-14

Exhibit 1

Resolutions Opposing the DGR (Cont'd)

	<u>Date Passed</u>
UNITED STATES – Michigan (Cont'd)	
City of Lapeer	21-Jul-14
Eaton County	16-Jul-14
Marquette County	15-Jul-14
City of Port Huron	14-Jul-14
Tuscola County	26-Jun-14
Lake County	25-Jun-14
Senate Resolution No. 150	11-Jun-14
Senate Resolution No. 151	11-Jun-14
Senate Concurrent Resolution No. 16	11-Jun-14
Senate Concurrent Resolution No. 17	11-Jun-14
Sanilac County	03-Jun-14
Alger County	19-May-14
Fort Gratiot Township	07-May-14
Huron County	22-Apr-14
City of Milan	10-Feb-14
City of Eastpointe	07-Jan-14
Charter Township of Clinton	03-Dec-13
City of Wayne	19-Nov-13
City of Gross Pointe Woods	18-Nov-13
Conference of Western Wayne	15-Nov-13
City of Wyandotte	23-Sep-13
Greenwood Township	10-Sep-13
Wayne County	22-Aug-13
St. Clair County	15-Aug-13
Village of Lexington	22-Jul-13
Lynn Township	13-Jul-13
Macomb County	20-Jun-13
State Senate Resolution 58	22-May-13
City of St. Clair Shores	07-Jul-08
St. Clair County Water Quality Board	12-Jun-08
Marine City	05-Jun-08
Macomb County	15-May-08
Macomb County Water Quality Board	13-May-08

Exhibit 1

Resolutions Opposing the DGR (Cont'd)

	<u>Date Passed</u>
UNITED STATES - Ohio	
Port Clinton	10-Dec-13
City of Toledo	01-Oct-13
City of Oregon	12-Aug-13
UNITED STATES - Illinois	
Cook County	08-Oct-14
City of Waukegan	03-Feb-14
UNITED STATES - New York	
City of Rochester	19-Nov-13
City of Niagara Falls	12-May-14
UNITED STATES - Pennsylvania	
City of Erie	02-Apr-14
UNITED STATES - Wisconsin	
City of Sheboygan	02-Apr-14
UNITED STATES - Indiana	
Gary	03-Jun-14
Michigan City	15-Apr-14
UNITED STATES - Minnesota	
City of Duluth	12-May-14