

Hello ... my name is John Kittle. I would like to thank the SWP Committee for the opportunity to speak to you today.

[Bio Summary: I spent 25 years in high-tech in Ottawa. For the last 12 years, I ran my own professional services company. I have degrees in physics and computer science, and early on, when I thought I might become a physicist, I spent 2 years in a research lab studying the radioactive properties of uranium.]

I represent a group of landowners in the Mississippi watershed who would be directly affected by contamination of groundwater from uranium exploitation in Frontenac County.

Off the top, I would like to correct a misconception ... we understand that MNDM has been told that the area in Frontenac County that has been claimed for uranium exploration is unpopulated. For the record, this is incorrect. In fact, there are hundreds of residents living close to the area being explored. ***We hereby request that the Ministry update its records.***

The balance of my comments today will be related to the letter received by this Committee from MOE, MNDM and Health, dated 24 July 2008.

The MOE letter states that elevated uranium contents observed in some wells are due to “naturally occurring uranium”. How does the Ministry know this? Perhaps the Ministry is not aware that there are several hundred uncapped/ungROUTED drill holes already in this area from unsuccessful exploration projects in the 50s, 60s and 70s. Since there was no baseline water tests conducted at the time, how does the Ministry know that uranium content in the water is not due to these previous exploration activities? How does the Ministry know that additional drilling will not cause additional groundwater contamination? Even MVC, who are the most familiar with the area, admit that they do not know the interconnection topology of groundwater aquifers in the area being drilled. ***We request a copy of the studies the Ministries have used to substantiate their findings.***

With reference to the MNDM response in Appendix A of the same letter, the Ministry states: “For typical uranium exploration projects which reach the diamond drilling stage, there is no significant risk to groundwater or surface water above that of drilling for any other mineral or a typical domestic water well.” We note that new residential wells are subject to strict regulatory requirements and in some cases a pressure test is mandated to determine impact on nearby wells. ***We request MOE to explain why these regulatory requirements are waived for over 100 exploratory drill holes in a populated area in the vicinity of scores of existing wells.***

We note that Ontario has had a holiday on environmental assessments at the exploration stage since 1996. So, exploration companies are basically self-regulated in Ontario. We suggest, given that uranium and its daughter products are some of the deadliest contaminants on earth, and

given the poor environmental track record of many mining companies, this policy puts our water at significant risk. ***We request an explanation of why the Province does not regulate or monitor mining exploration companies.***

I think we can all agree that an open-pit uranium mine in a populated area of the Mississippi watershed is out of the question. So, let's narrow our view and look at the specific risks from uranium exploration currently going on. Our research has found documented evidence of water contamination risks, mostly from other jurisdictions that have much more experience and stronger environmental regulatory controls compared to Ontario.

1. From the American Geophysical Union, Harvard University Abstracts, a peer reviewed paper titled "Influence of Leaky Boreholes on Cross-Formational Groundwater Flow and Contaminant Transfer", Lacombe, Sudicky, Frappe, Unger, dated 1995, states:
"abandoned and improperly sealed boreholes, monitoring wells, and water supply wells are common features at many contaminated sites. These features can act as conduits that transmit contaminants between aquifers ...".
2. From the US Hydrogeology Journal, a peer reviewed paper titled "Investigating Cross-Contamination of Aquifers", Paul M. Santi, John E. McCray and Jamie L. Martens, , Volume 14, Numbers 1-2 / January, 2006, which states "shallow aquifers can cross-contaminate deeper aquifers through penetration of an intervening aquifer ...".
3. Notice of Violation, June 2008, from the Department of Environmental Quality, State of Wyoming, issued to Strathmore Resources US Ltd, a Canadian mining company, re Drilling Notification 354DN, which illustrates substantial regulatory requirements in the state, regulations that do not even exist in Ontario.
4. Ontario Ground Water Association (OGWA) Presentation to Clean Water Act Hearings, August 2006, which states: "There are hundreds of thousands if not millions of water wells in the province of Ontario. This does not include monitoring wells and diamond drilled exploratory wells. All of these holes in the overburden and rock can, and do present the greatest risk to Ontario's ground water aquifers and even surface water."

Closer to home, Mr. Doug Nuttall, Mississippi Valley Conservation Authority, Aug 2007, states: "the aquifers in the target exploration area of the Mississippi watershed have never been properly mapped and that a detailed hydrogeotechnical study of the area is required to assess the impacts of exploratory drilling for uranium. "

Perhaps the Ministries are unaware of these risks and studies. ***We would be pleased to provide copies of the references for their edification.***

So, why are the authorities that are supposed to protect our water failing to do so? Why do they not learn from the lessons from other jurisdictions that have much more experience and stronger regulatory controls over uranium exploitation? Why is Ontario not following the lead of Nova Scotia, BC, New Brunswick and many US states in establishing moratoriums on uranium exploitation, or at least strengthening its environmental regulatory oversight during the uranium mining exploration stage?

Given these substantial risks, we suggest that the Province needs to exercise the cautionary principle here. Uranium contamination is permanent! We demand that the Province suspend all uranium prospecting, exploration and mining in the Mississippi watershed until a proper study of the environmental, social and economic impacts can be completed.