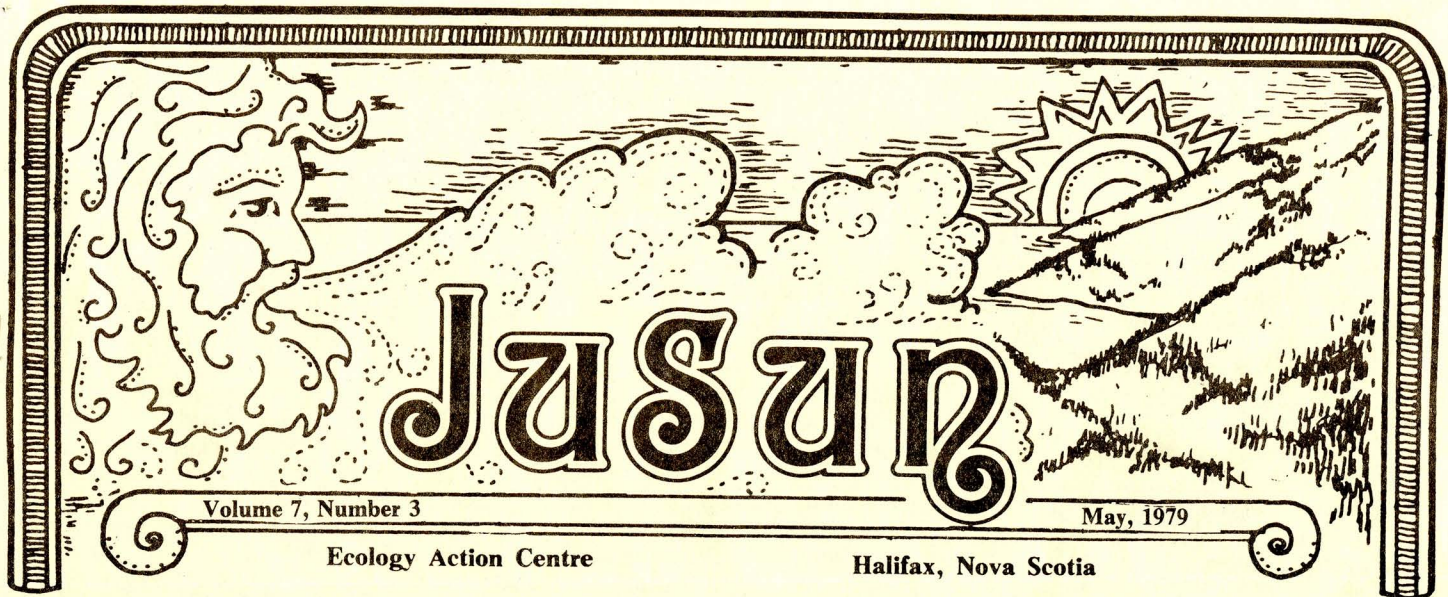


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### A SUMMARY OF EAC'S BRIEF TO THE PUBLIC UTILITIES BOARD HEARING

On May 10, 1979, Susan Holtz presented a brief to the Public Utilities Board hearing concerning NSPC rate increase applications. Ecology Action Centre did not intervene in the current hearing due to the prohibitive cost involved, the lack of new studies from the power corporation, and the fact that our positions on the topics at issue remain essentially the same as those we presented in past hearings. Susan's brief, however, did make some telling points not only in connection with the role of NSPC and the development of fair rate structures but also with the constraints imposed upon non-profit intervention in the hearing themselves and the environmental concerns related to the Power Corporation's use of herbicides for brush control along power line rights-of-way.

The brief emphasized NSPC's failure to provide data necessary for an accurate determination of marginal costs within the one year time limit specified by the Board at its last hearing. It singled out the importance of rate design restructuring and urged the Board to prepare for consideration, at least by its next rate application, alternate forms of rate structure, including a marginal cost based rate structure.

Susan pointed out that greater input from public interest groups would increase the credibility of the hearing process and the Board's final decisions. Under the present rules of procedure, and without a funding mechanism, interventions by public groups representing environmental or consumer concerns, or poor people, for example, are just about impossible due to financial constraints and requisite legal representation.

The brief also addressed itself to the Power Corporation's practice of using herbicides, which have been linked to a high rate of miscarriages, to control brush along rights-of-way as well as their failure to inform land owners affected ahead of time. Ecology Action Centre has received a number of complaints from around the province in regard to this issue. The Board was urged to

develop procedures and regulations which would insure that all the people in the immediate area to which herbicides are to be applied will be informed several weeks in advance and that if there are objections, the chemical will not be used on or near that person's land. We are aware of at least one individual who has offered, at his own expense, to keep his section clear of brush rather than have herbicides used on his land. We believe that routine procedures allowing this kind of alternative must be developed.



### ECOLOGY ACTION CENTRE AND SCOUTING AND GUIDING MOVEMENTS TO SPONSOR A RECYCLING PILOT PROJECT

The Guiding and Scouting movements and the Ecology Action Centre are spearheading a paper recycling program beginning October 4.

Mrs. Earl Croft, the spokesperson for the project, announced, "on a trial basis there will be a door to door pick-up every two weeks for six months in four areas—Cowie Hill Village, Leiblin Park, Thornhill Park, and Clearview Subdivision."

"Handbills explaining the purpose of this program will be delivered to each house in the collection areas by members of the Harbour West District Scouting group and the Guiding Spryfield Division and part of the Armdale Division for Guides."

If the initial effort proves that the public is interested in actively supporting this project the pick-up service will be expanded to include a wider portion of these District and Division areas which extend from the Armdale Rotary out along Purcells Cove Road and Herring Cove Road, and includes

Ketch Harbour, Sambro, Harrietsfield as well as Spryfield.

The project will be undertaken in cooperation with L&D Recycling Ltd.

"All recyclable paper will be collected", said Mrs. Croft. "Our children are our future. We very much hope the citizens will cooperate and teach our youth to become caring, ecology-minded citizens by setting a good example through recycling their own paper."

### EAC SPONSORS PROJECT ON COMMON LANDS AND RIGHTS-OF-WAY IN N.S.

The Ecology Action Centre is sponsoring a Young Canada Works Project to study common lands and rights-of-way in Nova Scotia. Jim Frost, a spokesman for the project, recently outlined its objectives.

"Common lands and rights-of-way exist throughout Nova Scotia in both urban and rural areas", said Mr. Frost. "The concept of public rights-of-way has long existed in English common law and rights-of-way are extensively used and widely respected in that country. An example of this in Nova Scotia is the public's right to cross private property to gain access to lakes and streams for sport fishing. By tradition, the public has also had the right to make use of hiking trails in rural areas and short cuts in urban ones."

"Our biggest problem", says Frost, "is that very little is known about the legal and historical evolution of these rights, and even less is known about the common lands and rights-of-way themselves. We welcome any information the general public would like to share with us, especially if they know of existing common lands and rights-of-way".

The project has four main goals: to determine the history of common lands and rights-of-way in the province, to establish the legal framework in which they exist, including their regulatory bodies, and to produce an inventory of existing common lands and rights-of-way. It is hoped that the results of this work will be published in the form of a booklet, which should be of great use to hikers, fishermen, hunters and property owners alike.

## HOW IT IS WITH US

by Susan Mayo

There is a gentle sound of spring rain outside.

Susan Holtz is away at a Maritime Energy Coalition meeting in Sussex, New Brunswick. The Maritime Energy Coalition, unlike the Maritime Energy Corporation, is composed of environmental organizations in Nova Scotia, New Brunswick and Prince Edward Island who joined forces about 5 years ago to oppose nuclear power, specifically at Point Lepreau, N.B. and generally throughout the world. Ecology Action Centre is a member of this coalition.

From Sussex, Susan is going to a meeting of the Alternate Energy Society in Cape Breton. She has been, and continues to be, guest speaker at many province-wide groups' discussions on nuclear power, its risks, benefits and alternatives.

Last month we worked with a team of volunteers who prepared, printed and distributed over 8,000 copies of the fact sheet "It Can Happen Here" (enclosed). The leaflets were handed to people who went to the Halifax movie theatre where "The China Syndrome" was playing. As a follow-up to this effort the Centre sponsored two information nights on nuclear power and nuclear accidents in the Halifax/Dartmouth area, both of which were very well attended. The panelists included two radiation biologists, an engineer and S. Holtz as an energy policy analyst.



In these efforts, we have been stressing several points. One is that in addition to examining in depth the nuclear energy option, especially its hazards, the discussion must always be brought back to the broad context of realistic, overall energy policy alternatives and objectives. As well, information must be up-to-date, accurate, and widely available—a desirable but hard-to-achieve goal in this complex issue. And finally, once having become concerned and then informed about an issue (any environmental issue), the greater the number of individuals and community groups that take action and voice their opinions and concerns, the better.

It is purported that each single personal letter written to the government equals the opinions and feeling (and votes) of 10,000 people. New Zealanders organized a door-to-door campaign to collect a half million signatures and succeeded in having a 10 year moratorium on nuclear plants declared.

Moreover, the choices we make between nuclear power and its alternatives must be expressed in as many ways as we are able—everything from buttons to bumper stickers to conversation over tea with neighbours, friends and politicians, letters to the editor, highly polished newspaper and magazine articles and formal briefs to government.

Sincere thanks are extended to CMHC Halifax office (Historic Properties) for their valuable donation of several hundred legal file folders for which they had no further use. Our library organizing efforts have greatly benefited from this contribution in kind. Also, thank you Lucille Stewart for several years back issues of the journal **New Scientist** and Sam Brooks for a one year subscription to **Co-Evolution Quarterly**. We extend appreciation to each of the members and friends of EAC who donated books to our March Booksale which was held with the cooperation of the Pictou-Wentworth groups of Kati-mavik. In all, \$510 was raised from the sale.

With the assistance of several large and small companies, Ginny Point recently attended a conference on Composting and Wastewater Recycling in Philadelphia. She had a first-hand, practical look at several municipal composting facilities and enthusiastically hopes to inform and educate interested Nova Scotians on the benefits of sewage composting and sewage recycling for large and small communities.

There has been a sharp increase in operating capacity at the Ecology Action Centre. Three people have been hired for each of two programs: one is a common lands / rights-of-way project (see news release page 2) and the other task is the preparation of an environmental law text for Nova Scotia high schools (funded through the Federal Department of Justice). In addition, we have two students funded for the summer through the Nova Scotia Department of Environment: Lorraine King and Lawrence Tummon, who are organizing the library material, and researching and writing environmental fact sheets for public distribution. Their topic choices will be based on suggestions we receive from our members as well as public requests for information (see page 4).

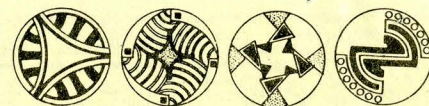
Well, it has stopped raining now so it is time to go out on my bicycle and do the office errands. And that is how it is here at EAC this month.



### ECOLOGY ACTION CENTRE RELEASES NUCLEAR DOCUMENTS March 29, 1979

Ecology Action Centre today made public two documents which, directly or indirectly, concern the use of nuclear power in Nova Scotia and the Maritimes.

The first is an in-house feasibility study of the Maritime Energy Corporation, undertaken by the federal government and the three provincial utilities, dated July 1977. The feasibility study makes it clear that the Maritime Energy Corporation (MEC) would proceed on the assumption that centrally generated electricity should substitute for fossil fuels and that nuclear power plants should be the means of supplying that electricity. However, the financing of these plants is recognized as a major obstacle. The feasibility study concludes that the main reason for the existence of the Maritime Energy Corporation is to reduce the financial



risk associated with these projects and to gain preferred financing rates through the federal government. Other benefits, such as integrated dispatch of generating units, could be achieved "within existing utility structures". A second Point Lepreau nuclear unit is mentioned, along with a nuclear reactor in Halifax in the late 1980's. Tidal power is seen as a possibility, in conjunction with nuclear, and the role of coal is less important than that of nuclear energy.

The document also recommends that the MEC be "self-regulating" and that legislation be enacted exempting it from control by provincial Public Utility Boards. The MEC structure will be made up of electricity utility personnel only.

Susan Holtz, Ecology Action Centre's energy coordinator, commented, "In Ecology Action Centre's view, this scenario means that an energy path pursuing electricity growth will be followed regardless of marketplace economics which would normally make the projects too risky and costly. Other options besides electricity will be downplayed.

At the same time, she added, public input and political control over energy planning will decrease. For example, one federal negotiator commented to the Ecology Action Centre that he would assume that environmental impact assessment of MEC projects would simply be waived. And whether or not nuclear energy is publically acceptable has never been addressed as a serious question by the federal or maritime provincial governments. "If the Maritime Energy Corporation planning goes ahead as the document suggests", Ms. Holtz concluded, "there never will be the opportunity to have the necessary broad and informed public discussion of the issue that there should be. We'll be in it whether we like it or not."

Ecology Action Centre also released its brief to the Atomic Energy Control Board concerning proposed changes in radiation protection standards in the event of a nuclear reactor accident. The changes **increase** the amount of public radiation exposure in the event of accidents which are judged unlikely to occur, and links exposure limits to a probability analysis of the likelihood of that accident. Ecology Action Centre disputed probability analysis of accidents as a reliable basis for limiting exposure and especially of increasing limits.

Why there is any necessity to increase the limits after many years of remaining the same is an unanswered question. The Canadian Coalition for Nuclear Responsibility alleges that new evidence indicates that the CANDU emergency core cooling system would not function properly during an accident. In light of the recent nuclear accident in Pennsylvania, this matter could be extremely serious.

Similarly, we disagree that consequences of accidents with a predicted rate of occurrence of less than ten to the negative seven / reactor unit / year need not be analyzed in detail nor limited significantly. (Continued on page 3)

(Continued from pg. 2)

A major reason for our concern is our belief that probability analysis is not sufficiently accurate or reliable to serve as the basis for public protection standards in the event of a reactor accident. The documents made available to the Porter Commission by Dr. Gordon Edwards regarding the ECCS at NPD and other Canadian reactors certainly do not provide any great confidence in current reactor safety analysis. In addition, the recent decision by the U.S. Nuclear Regulatory Commission not to give credence to the Rasmussen Report's bottom-line numbers with regards to probability of accident in light water reactors should serve as warning that this entire avenue of approach is suspect. In particular, the fact that no work on CANDU reactor safety in anything like the detail provided by the Rasmussen Report—which latter has nevertheless been found unreliable by peer review—should prompt reconsideration of this approach immediately.

(As well, the major loss-of-coolant accident which occurred today in Pennsylvania in a reactor near Harrisburg was considered to be an extremely improbable, in fact many would have said incredible, incident.)

We also, in principle, cannot accept any raising of the reference dose (in this case, from 25 rems to 100 rems in emergency conditions) in light of virtually all work done on radiation hazards in the last decade. The thrust of this recent scientific work, including the general acceptance of the hypothesis that no safe threshold of radiation exposure exists, has been that the risk of health and genetic damage is considerably greater than previously assumed. (We find the remark, on page 24 of the Report, that "a reference dose of 1Sv (100 rems) . . . usually would not result in more than a mild sickness" to be quite an extraordinary statement, especially in an AECB document. It ignores all but acute effects, and even there it doesn't take account of the probable major damage to any fetus unlucky enough to be so exposed. As for longer term effects, suffice it to note that the doubling dose for the mutation rate is now considered to be well within that limit (10-30 rems for acute exposure); not to mention the increased risk of cancer and other late-appearing somatic effects.

Regardless of the likelihood of accident, if radiation exposure does occur, the population at risk is not merely the present generation, but, because of genetic damage, future generations as well. Any decision, therefore, which increases exposure limits because of any sort of cost/benefit tradeoffs, ignores the ethical issue that health costs fall on those who cannot realize any of the benefits, namely people yet unborn. It should also be pointed out that in relaxing any reference dose limits, presumably because of economic benefits due to less stringent reactor safety design requirements, whatever health costs occur will fall disproportionately on those in the reactor's vicinity, while benefits will accrue to all utility customers. In other words, ethical issues which involve who specifically will be called upon to bear what costs and who will gain what benefits are not being squarely addressed.

**THE CASE FOR A SUSTAINABLE AGRICULTURE BASED UPON ECOLOGICAL PRINCIPLES AND ITS RELEVANCE TO NOVA SCOTIA**

**SUMMARY OF A STATEMENT PRESENTED TO THE PEOPLES FOOD COMMISSION, HALIFAX, N.S.**

Agriculture is just that: agriCULTURE. Its nature, and thus both its problems and attributes, are a result and a reflection of the actions of every one of us.

We at the Ecology Action Centre are concerned about a number of problems related to our present agriculture habits including the following ones in particular: (1) the continuing trend toward the elimination of small farms; (2) the rising cost of farm inputs; (3) the dependence of today's agriculture on cheap energy; (4) the **increasing** dependence on fertilizer and pesticides; (5) the reduction of soil fertility through overproduction; (6) erosion; (7) the loss of productive land to non-agricultural activities; (8) the increasing dependence on foreign food sources; (9) the contamination of foods by toxic substances; and (10) the loss of genetic diversity in domesticated plants.

All of these problems contribute to the increasing food costs we are experiencing now, and ultimately to the NON-SUSTAINABILITY, that is, the collapse, of our present agricultural system.

Many of these matters are the long term, negative effects of agricultural practices which in the short term are cost effective. For example, erosion has been enhanced by use of herbicides and non-organic fertilizer; pest problems have actually been aggravated by use of pesticides.

In the long run, to be SUSTAINABLE and AFFORDABLE, agriculture must conform to certain basic laws of natural survival such as the preservation of ecological and genetic diversity, and the recycling of nutrients removed from the land.

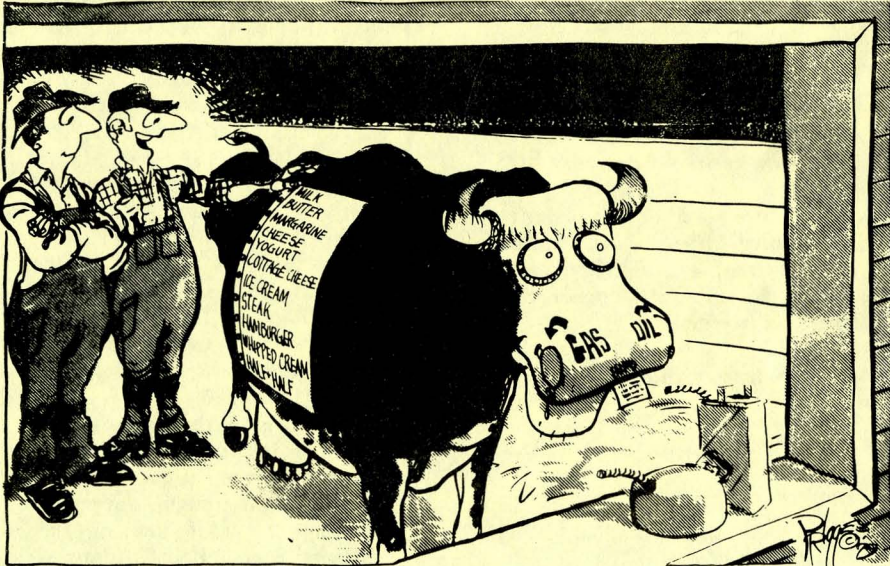
Nova Scotians need to give special attention to the ecological limitations of food pro-

duction. Our land here is not farmland with naturally high yields. It is a high rainfall region where reserves of nutrients in the soil are low, and nutrients applied as fertilizer are used very inefficiently, in comparison to conditions in Canada's western provinces. Moreover, erosion is particularly severe. Where row crops grow on 7 to 12 degree slopes, the land erodes at a rate of about 25 tons per acre, and that's over a foot per century. The most effective way of dealing with these natural limitations is by doing as nature does, by rotating deep rooted crops with shallow crops, using legumes for nitrogen, and keeping ground cover on the soil. Even if it costs us in the short run, it is the only way to gain in the long run.

"Organic" or "Ecological" agriculture is not a popular expression in most circles. It engenders images of the idealistic "flower-children" of the 1960's. But even if it was only associated with that lifestyle, it is not now; not in this age of dwindling cheap energy sources. Several studies have shown that ecological agriculture in its present state of development (which has not benefited from the massive industrial and government support of conventional agriculture) can be just as productive and profitable as conventional agriculture. The labour requirement is greater, but the energy consumption is only 40% of that in conventional agriculture. That's the kind of agriculture we'll need in the future, not one that uses fewer people and more energy!

It should be kept in mind that ecological agriculture isn't just a matter for the farmer to consider; if changes are to be made they must be made by all of us. Consumers must recognize how their choices influence the practices of the farming system. Teachers must put agriculture back into the curriculum, as part of the cultural and natural studies. It is not just another industry. And we must give farmers the economic incentives to practice an ecological, sustainable agriculture; to practice a way of farming that provides an **investment** in the future.

(Continued on page 4)



'Yes, had it installed just last week.'

(Continued from pg. 3)

We are, in fact, talking about a whole way of life when we talk about the food we eat, where we live, about marketing, economics and legal systems, about changing tax structures . . . basic changes, but no more so than the changes of the last 40 years, and certainly preferable to the changes that will be imposed upon us if we continue to practice a non-sustainable agriculture.

What is possible today is the development of a system of ecological agriculture operating in parallel with the present system. In a way, this exists now in the form of small farms selling directly to cooperatives in the city. The demand is there, the desire is there, and such a system should be encouraged by government, not as one in conflict with intensive agriculture, but as one that is sensible on a small scale now, and, as it evolves, on a larger scale in the future.

In the interest of seeing such a system developed in this region, we as an unofficial, volunteer group of concerned rural and urban Atlantic Canadians are seeking ways (1) to develop expertise and skills in the area of agriculture through using ecological methods in our approach; (2) to inform the public, in particular the farmers; (3) to encourage debate, both public and private, over issues relating to existing agricultural methods and their alternatives; and (4) to demonstrate that ecological agriculture, as we see its design, is economically sound, environmentally the wisest choice and sustainable. Our submission here today to the Peoples Food Commission is a first step in our endeavours.

*Note: People interested in working with the agriculture committee please contact the Centre by mail or phone.*



## FEEDBACK

**What are the environmental issues about which you are most concerned?**

**We'd like member feedback in order to develop research files, plan public events, put together JUSUN, etc. Please write the EAC office, or call 422-4311 if you prefer.**

**Environmental issues that concern me most are:**

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## THE STAPELLS' DEVELOPMENT AND BRUNSWICK STREET PLANNING

by Elizabeth Pacey

Brunswick Street in Halifax has been considered, in modern planning terms; to be particularly sensitive because of its proximity to Citadel Hill and the Old Town Clock. In fact, for more than 20 years, the necessity that redevelopment be sympathetic to these major historical and environmental focal points, has been recognized. Yet, in spite of 20 years of planning for low-scale development, a recent proposal for a high-rise tower at the corner of George and Brunswick Streets has been launched by Halifax developer Bob Stapells.

According to the developer's plans, the building, called Time Square, would rise 281 feet above sea level. In other words, it would be 12 feet higher than the Toronto Dominion Bank Building, 25 feet higher than the Barrington Tower of Scotia Square and 44 feet higher than the ramparts of the Citadel.

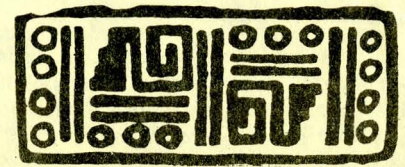
It would rise higher than any other building in the Downtown. Furthermore, the proximity of such a colossal building would undoubtedly dwarf the Old Town Clock and dominate the Citadel.

Such a proposal contradicts a trend to low-scale development which goes back at least as far as the Stephenson Report of 1957. Stephenson envisaged low-scale redevelopment leading up "to the famous Town Clock and Citadel Hill which dominates the Halifax skyline". By 1964, the Draft Development Plan for the Central Business District was more specific, called for careful massing of new construction in the area which was described as "strategically located along the foot of Citadel Hill with its scenic and recreational potential", coupled with "an important section of George Street with the famous Town Clock closing the vista".

During the 1972-74 controversy over the protection of the view from Citadel Hill, there was a good deal of public concern that special height controls were needed around the perimeter of the Citadel in addition to the view protection regulations. In June, 1973 Halifax City Council refused to waive set-back regulations to permit a 10-storey office building, proposed by Queen's Square Development Ltd. on Brunswick Street. Similarly, in December of 1973, City Council rejected the Atlantic Tower which had been proposed for Rainnie Drive.

Finally, on January 31, 1974, Halifax City Council passed view plane legislation to protect a good proportion of the panorama from Citadel Hill; at the same time, the Mayor and Council indicated to the City Solicitor that they wished special height control legislation for Brunswick Street to be drawn up. Two months later, on March 31, 1974, City Council passed a resolution that:

"staff proceed with further amendments to the Zoning Bylaw to limit future construction on the East side of Brunswick Street to a height roughly approximating the roof line of the present School Board Administration Building. . . ."



Since the resolution of 1974 the City has proceeded further with its long-standing intention to regulate heights of new buildings in the Brunswick Street area. A policy statement (7.3 of Part II, Section III) in the Municipal Development Plan, approved in March 1978, states:

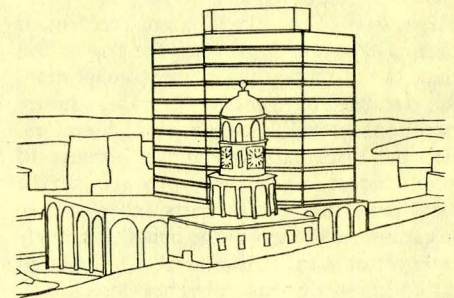
"The City shall prepare height and design criteria that reflect the relationship of Brunswick Street to the Citadel, and that maintain the quality of heritage buildings on Brunswick Street."

In accordance with this policy, a plan for height and design criteria in the Brunswick Street area is now in preparation. As well, there is, currently, a 40-foot height limit for this area under Schedule F of the Zoning Bylaw.

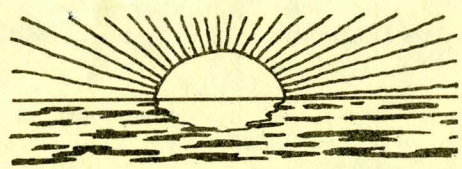
While the proposed 'Stapells' development would lie between view planes and would not contravene the Views Bylaw, it would most definitely block out a large portion in the centre of the panoramic view, thus contravening the spirit of the Bylaw. Furthermore, the proposed tower would contravene the 40-foot height limit (by 131 feet) along with current setback regulations, the special resolution of March 1974, and 20 years of sound planning for the area.

The office tower is touted by Stapells as a "crystal palace" that would reflect the Old Town Clock. But one doesn't have to know very much about optics to know that such a reflection would be distorted at best. At the same time, the proposed tower would block out the magnificent view of the harbour and seriously diminish the dominance of our nationally recognized symbols, the unique Old Town Clock and star-shaped Citadel.

It is to be hoped that existing City regulations will not be waived by City Council to allow what promises to be the most detrimental project of a decade.



*A drawing of the proposed Stapells' development in relation to the Old Town Clock and the view from Citadel Hill. Based on a photograph taken from a position near the entrance to the Citadel, the angles subtended by the proposed development have been calculated mathematically from the developer's plans.*



Master Poem

Once my mind stood empty  
With my thoughts upon the sea  
Turning I face the land men conquered  
By nailing two ribbons of steel  
To the earth, from sea to sea  
As my eyes search the mountains  
Like the streams along her coast  
My thoughts, rolled in from the sea

Beginning with the grains of sand  
And ending with the stars  
The heavens, shared her secrets with me  
And seeing countless visions  
Riddles without words  
Mingled with heavy warning  
Like the counting of many words,  
This is what wisdom taught me.

by Andrew Robichaud

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**BRIEF TO THE ATOMIC ENERGY  
CONTROL BOARD CONCERNING THE  
REPORT OF THE  
INTER-ORGANIZATIONAL WORKING  
GROUP ON PROPOSED SAFETY  
REQUIREMENTS FOR LICENSING OF  
CANDU NUCLEAR POWER PLANTS  
BY THE ECOLOGY ACTION CENTRE,  
HALIFAX, NOVA SCOTIA  
SUSAN HOLTZ AND DR. OM KAMRA  
MARCH 1979**

**I. Review Process of the Report**

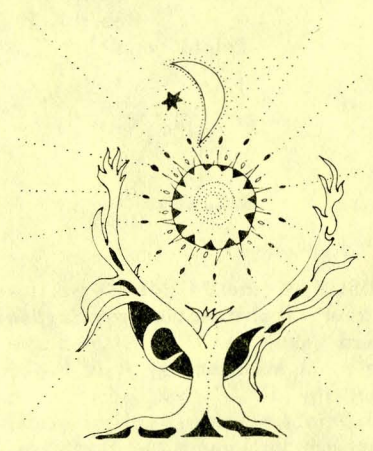
Our first comments about the IOWG Report must be concerned with the process whereby this document will be reviewed.

We wish to state at the outset that we consider the matter covered in this report—public radiation protection in the context of reactor safety licensing requirements—to be of the utmost concern. The issues raised are most definitely not trivial nor are they merely theoretical; moreover, the consequences of ill-advised judgments, in the form of genetic damage from radiation exposure, extend far into the future. With this view of the seriousness of the proposed changes, then, we wish to voice our strong objections to the review process as we perceive it and have experienced it.

In the first place, the time allowed for public input is much too short for analysis of anything beyond the general principles involved in the revision of the radiation reference standards. Ecology Action Centre did not hear about the IOWG proposed changes until the final week in January, which left us with very little time indeed to prepare a brief. One cannot help wondering, since there have been no changes in these standards for many years, why such an astonishingly short time has been reserved for review. In the preface to the document (AECB-1149), which

is dated **November 1978**, it is stated that the AECB will make a decision on the recommendations **in the early part of 1979**. Even with widespread public awareness that these recommendations were in preparation (and this awareness certainly was not there), that amount of time to prepare detailed comments is clearly not adequate. What is the hurry to reach a decision on these recommendations, especially since it is not a question of making them more stringent?

Moreover, to our knowledge, no effort has been made actively to solicit public or peer review. As authors, we feel our own case illustrates this point: Ecology Action Centre is the largest non-government environmental organization in the Maritimes, and has been involved in the nuclear energy issue for some seven years—and yet neither of us heard about the IOWG proposed changes directly from the AECB. Certainly if people like ourselves were not informed about the IOWG proposals, the general public must be even less aware of the matter.



Finally, meaningful public and peer review requires not only time and information but also money to do the necessary research. It is our general assessment that outside review has been seriously lacking in the Canadian nuclear establishment. This very important kind of input will continue to be excluded as long as independent researchers and public interest organizations are not funded to provide it. The lack of funding for review of this document is no exception—we feel that funding for this purpose should have been, and should be, available from the AECB.

**II. Critique of IOWG Recommendations**

In broad terms, we agree with the reactor safety philosophy which attempts, through all possible means, including independence and diversity of safety systems and the setting of radiation exposure targets well below actual limits, to reduce levels of public exposure as far as possible.

However, we are in profound disagreement with the procedure and recommendations of the IOWG document in several matters.

1.) We disagree with the general approach of limiting the individual radiation reference dose, in the event of an accident, on the basis of the predicted rate of occurrence of that failure.

2.) We are extremely concerned at the lack of strict licensing guidelines which results from the recommendation that if, in the late reactor design stage, requirements cannot be met, the AECB can increase the reference dose by a factor of 10. In effect, this means giving such leeway to the AECB that it allows the public no recourse in attempting to make sure that strict licensing requirements be met; a technical elite will be making private judgments about the safety of many, in the absence of published standards which must be adhered to. We feel this informal, elitist manner of making decisions potentially affecting many people's safety has been all too characteristic of the Canadian nuclear industry, and the continuation of this discretionary approach should not be permitted.

3.) In view of potential damage to the population gene pool, we cannot accept the lack of regulatory limits for total population exposure.

4.) We also are concerned about using an individual's exposure limit based on the operation of one reactor unit in isolation. In practice, reactor units are sited as parts of a nuclear complex, and a nearby person's actual risk is in fact doubled or tripled or quadrupled, depending on the number of units in place. This type of siting practice must be taken into account in determining reference dose limits.

5.) While agreeing that probability analysis is an inappropriate vehicle for risk analysis of external events, we nevertheless think that the discussion of external events is inadequate in that it is too general and offers no precise design requirements. The general tone of these recommendations is one which seems to dismiss these events as so unlikely that they need not be analyzed seriously. We would urge that much more detailed methods of analyzing these occurrences and their consequences be developed and published for review.



**THE FIRST WINDMILL TO SUPPLY ELECTRICITY** to a commercial utility on a regular basis began operation in January in Clayton, New Mexico. The 200-kilowatt, wind-powered generator, financed by the federal government, is expected to supply one-sixth of the power needs of Clayton's 3000 residents. If the experiment is a success, the government plans to install two similar generators later this year in Puerto Rico and Rhode Island and a much larger generator in Boone, N.C., one that will be able to produce enough electricity to provide heat and light to 500 homes—*Washington Star*, January 30.



Solar  
Energy  
Society of  
Canada Inc.

## National CONFERENCE

79  
PRINCE EDWARD ISLAND  
AUGUST 18th to 21st 1979

# SOLAR ENERGY BRINGING IT DOWN TO EARTH

The '79 National Energy Conference will be hosted by the Institute of Man and Resources, UPEI, Holland College and the PEI SESCO Chapter. It will feature technical and plenary sessions on all forms of renewable energy with some of the topics to include government and private sector activities; research in other countries; the social, economic and legal aspects of renewable energy; definitive performance criteria from current demonstration programs; and applications of renewable energy to agriculture and aquaculture.

Dear Editor:

There are many things taking place in society today that I would like to see changed. But many people are content with things as they are—why can't I be? Because I have concern for the future of civilization; where people can live virtually worry free of their ancestors' problems. A lot of today's perplexing matters are beyond my grasp with regards to any sort of a workable solution to them being worked out by myself. There is one problem which should be within everyone's grasp—the breaking of bottles in Point Pleasant Park. Many people who consume alcoholic beverages in the park at night act irresponsibly in the disposal of their empty bottles. For every bottle taken out of garbage receptacles in the park there are approximately a score of broken ones littered about the grounds. It is about time we took hold of ourselves and showed some concern for the maintenance of a clean environment by not littering and smashing bottles (many returnable).

Sincerely Yours,  
Robert A. Holmes  
Point Pleasant Park Laborer



**JUSUN is the MicMac word for "wind". It also contains our English word "sun". As wind is the active agent of solar energy it is hoped that the JUSUN will serve as a medium for voicing environmental concerns throughout the Maritimes.**

### JUSUN STAFF

Editors .....Susan Mayo  
Lorraine King, Lawrence Tummon

**"IF I CANNOT DO GREAT THINGS, I CAN DO SMALL THINGS IN A GREAT WAY"**

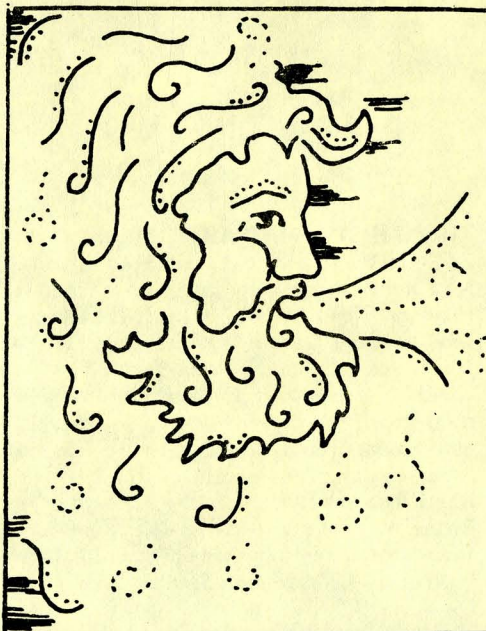
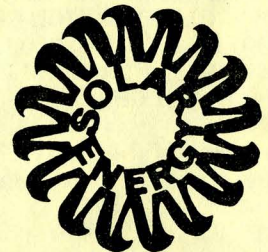
*Children should be taught that what they do matters, particularly what they do on a day to day basis.*

*At a very early age, they can begin to learn that we are all part of nature and dependent on it for everything we need and use; that these things are not in unlimited supply and that they must be shared and protected.*

*By our example, we can encourage them to . . . walk to school . . . buy less . . . take care of their things . . . pass them on . . . welcome the hand-me-downs . . . keep fit . . . clean up their plates . . . turn off the lights . . . turn down the volume . . . ask where it comes from . . . ask where it goes . . . read the label . . . smell the air . . . be kind to animals . . . and people . . . question the ads . . . learn the facts . . . pick up a candy wrapper . . . turn off the tap . . . protect wilderness . . . and wildlife . . . plant a garden . . . share more . . . waste less . . . understand that 'bigger', 'more', 'newer', do not necessarily mean 'better' . . . think about fairness and responsibility . . . keep it up.*

*And we can:*

*Turn down the thermostat . . . share our car . . . cut down on disposables . . . consider our health . . . consider our neighbours . . . consider our grandchildren . . . know our MP . . . and our M.L.A. . . . write them . . . write them again . . . work for clean space . . . a clean river . . . and a clear sky.*



### Annual Membership

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