

September 5, 2025

To: Great Lakes Executive Committee Co-Chairs

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Re: Urge to accept/pass radionuclides as a *candidate* CMC under the GLWQA

As you know, in 2016 and again in 2022, one hundred and ten environmental, health and other advocacy groups nominated radionuclides to be named Chemicals of Mutual Concern (CMCs) under the GLWQA.

In June 2025, the Annex 3 co-leads from the Canada Water Agency and the United States Environmental Protection Agency recommended that you **not** pass radionuclides on from the “initial screening”, which has just been completed, to a “detailed screening” as described on slide 5 of their presentation to you at the GLEC meeting in June.

For your consideration, we are submitting the following response during the GLEC comment period to urge you to move radionuclides to the “detailed screening” phase as a candidate CMC. In the process to screen radionuclides, the following “detailed screening” stage provides for:

“Thorough evaluation of the candidate CMC documented in a Binational Summary Report. Report includes info on environmental fate and transport, sources and releases, existing management and control, and knowledge gaps (sections 1 – 4 of a Binational Strategy).”

This candidate stage results in a recommendation to you, (the GLEC Co-Chairs) as to whether radionuclides should be designated as a CMC.

Prior to you making that decision, “formal public consultation” occurs. This is the first time in the CMC process that formal public consultation occurs. Indeed, the recommendation and information from the “initial screening” isn’t even available to the public; it doesn’t appear on binational.net.

Then you as GLEC decide on whether radionuclides should be designated as CMCs.

We offer the following commentary and recommendation for your careful consideration:

Is the “initial” screening of radionuclides adequate basis for removing them from the designation process?

The Annex 3 co-leads recommend that you not go onto the “detailed screening” step. Our review of their presentation to GLEC and of their 123-page draft screening document¹ is that it is not an adequate basis for not advancing radionuclides onto the “candidate CMC” stage. In material attached to this letter, we provide feedback on items that we think are the main flaws in the analysis and assessment of the criteria framework.

The fundamental flaw in the “initial” screening is that it ignores the GLWQA. Since CMCs are an instrument unique to the GLWQA, that Agreement must be the major guide when making decisions on CMCs or potential CMCs.

The GLWQA principles lists, among other items, that the governments should take a full ecosystem approach, should take long-term perspectives, acting now with the very long-term future in mind instead of waiting for a crisis. It also means that the public should be a central part of the activities.

Annex 3 of the GLWQA clearly intends that a major part of the work as a result of the designation of a CMC should be on science, monitoring, etc. Therefore, limitations or gaps in science and monitoring should **not** be a reason for **not** designating the substance as a CMC. Instead, an important reason for designating a CMC is to **ensure** that the science and monitoring are carried out necessary to improve our understanding of the substance and as a result, know the actions that we need to take in a binational strategy.

Therefore, we urge you to move radionuclides from the “initial screening” process to the “detailed screening” stage.

We are available to discuss our comments and position on radionuclides under the GLWQA.

Yours truly,

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¹ “Summary of Binational Screening Criteria for Nominated Chemicals of Mutual Concern under Annex 3 of the Great Lakes Water Quality Agreement: Radionuclides,” draft May 21, 2025.

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