

The Hon. Catherine McKenna
Minister Environment and Climate Change Canada
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Gatineau, Quebec K1A 0H3

The Hon. Amarjeet Sohi
Minister of Natural Resources
580 Booth Street
Ottawa, Ontario K1A 0E4

The Hon. Kirsty Duncan
Minister of Science and Sport
235 Queen Street
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Delivered via email

October 30, 2018

Re: Safeguarding Canadians, Our Environment and Future Generations – Rethinking Small Modular Reactor Deployment in Canada

Dear Ministers:

We, the undersigned organizations, collectively make the following comments regarding the development and deployment of Small Modular Reactors (SMRs) in Canada.

1. Canada should not advance investment in “novel” forms of nuclear energy when transparent, public dialogue has not occurred

Canada has not endeavored to listen to Canadians, nor sought their views on the development and deployment of SMRs in Canada. Instead, Natural Resources Canada, in its limited consultation launched in February 2018 on its “Small Modular Reactor Roadmap,” only invited submissions which met certain criteria, namely, that they relate to one of three possible applications for SMRs.

Canada’s nuclear regulator, the Canadian Nuclear Safety Commission (CNSC), has also undertaken SMR stakeholder workshops, but to our knowledge, no civil society or environmental non-government organization has been approached or engaged in these interactions.

Canada is not promoting the conditions necessary for democratic transparency and effective public participation in nuclear related decision-making and policy development. The development of nuclear activities in Canada should not occur absent information sharing among stakeholders – which by necessity must include the public – and decision-making processes based on public, participatory review and sound information.

2. Requiring an environmental assessment would uphold Canada’s commitment to sustainable development

As part of Canada’s commitment to sustainable development, a strategic environmental assessment should be undertaken prior to any expansion of nuclear generation in Canada. In particular, there must be an examination of how such an energy path would align with the *Federal Sustainable Development Strategy*. To this end, there should have been direction by Ministers at the earliest stages of decision-making to seek information and improve the understanding of the relationship between SMR development and its potential environmental, social, cultural and intergenerational effects.

On a related note, due to the ongoing consultation on Bill C-69, *The Impact Assessment Act*, there is no clarity as to whether SMRs will trigger federal environmental assessment under the proposed Act. Until a strategic environmental assessment of SMRs is completed, and SMRs are included in the proposed *Impact Assessment Act*, we request that any further steps towards SMR deployment, licensing and regulation, be put on hold.

3. Technologies which add to Canada’s nuclear waste legacy do not belong in Canada’s energy future when affordable and safer alternatives exist that are less environmentally, socially, and intergenerationally costly

Despite SMRs being a recurring theme, rising and falling over the decades, the technology remains undeveloped and unproven. Preliminary regulations for the licensing for SMRs, as proposed by the CNSC, also operate on a false assumption that Canada is capable of managing additional reactor wastes when currently, there are no comprehensive policies and strategies for the long-term management of non-fuel radioactive wastes in Canada. The strategy for fuel wastes that the federal government accepted in 2007, the Nuclear Waste Management Organization’s “Adaptive Phased Management,” is conceptual in nature and the likelihood of implementation has not yet been established.

In addition, SMR wastes are wholly outside the NWMO mandate and the scope of the *Nuclear Fuel Waste Act* (2002). The CNSC itself has also recognized that new fuels from SMRs could challenge the designs of long-term fuel storage facilities. Social and environmentally acceptable means of storing long-lived radioactive waste should be a prerequisite to any further nuclear development.

Requested Action

Finally, and perhaps most importantly, so called “small modular reactors” are untested and undesigned, and thus their operational and production abilities are unknown. Although the nuclear industry has made claims about the cost effectiveness of SMRs, independent academic studies show that electricity from SMRs will be more, not less, expensive than electricity from large nuclear reactors, which, in turn, are more expensive than alternative, low-carbon sources of electricity.

It is important that Canada not make policy statements with respect to small modular reactors that are based on industry speculation rather than actual evidence. Canada must make a clear policy statement that these or other energy technologies will only be considered for deployment if they meet the conditions noted above, are cost-effective and will not rely on continuing public subsidies.

We oppose Canada's development and deployment of SMRs when renewable, safer and less financially, socially and environmentally costly alternatives exist. Canada must remain accountable for its commitments of sustainable development and open government and ensure that these fundamentals are not compromised.

Yours very truly,



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Mike Wilton



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Zero Waste 4 Zero Burning

Zero Waste 4 Burning
Louis Bertrand, Representative