

Coalition for Responsible Energy Development in New Brunswick

June 1, 2020

To: Canadian Nuclear Safety Commission (CNSC)
by email: cnscc.interventions.ccsn@canada.ca

RE: Submission by the Coalition for Responsible Energy Development in New Brunswick to the CNSC on the scope of factors for Global First Power's MMR Environmental Assessment

The Coalition for Responsible Energy Development in New Brunswick (CRED-NB) represents groups and individuals supporting a sustainable energy future in our province. We are aware that all nuclear facilities will cause environmental impacts by producing radioactive waste that will exist for countless generations of humans and other species.

We note in your "*Disposition Table of Public and Indigenous Groups' and Organizations' Comments on the Project Description— Micro Modular Reactor Project*" that the CNSC states: "SMR projects not subject to the Impact Assessment Act (IAA) will undergo a determination by CNSC staff on the type of environmental review required in accordance with the CNSC's mandate under the NSCA."

We believe that the environmental assessment undertaken for the proposed MMR at Chalk River should not serve as an EA for future projects brought forward by proponents of "small modular" or "advanced" nuclear reactors, although your statement suggests that it could indeed be used as a model. We have previously made clear to the federal government our belief that no EA exemptions for small modular nuclear reactors (SMNRs) should be permitted in Canada. Every SMNR project should be considered in its specific environmental, economic, social and community context.

CRED-NB endorses the submission by the Canadian Environmental Law Association (CELA) and Dr. Ramana. We urge you to accept their analysis about the importance of this issue and the need for thorough and detailed scoping details at this stage of the EA process. We are disappointed that CELA's request for an extension of the comment period was denied, despite the obvious difficulties in undertaking genuine consultations under COVID-19.

We also request an extension of this comment period and a suspension of decision-making for this EA. An extension will allow a respectful consultation to engage the communities in proximity to the Point Lepreau reactor and proposed SMNR projects in New Brunswick, including Indigenous communities and coastal communities, to understand their perspectives on the scope of an Environmental Assessment. We believe our request is appropriate considering your statement quoted above that implies that the scope of the EA for the Chalk River project may be considered in the CNSC's assessment of the proposed projects in New Brunswick.

Sincerely,
Dr. Susan O'Donnell
for the Coalition for Responsible Energy Development in New Brunswick
cc: CELA