

## **What's an impact / environmental assessment?**

Impact Assessment (IA) promotes a 'look before you leap' approach to environmental decision-making and planning.

It requires an evaluation of a project's risks and harm, alternatives, its purpose, and cumulative impacts on social, economic, Indigenous and environmental values BEFORE it is constructed or approved.

IAs are multi-step proceedings, with public participatory rights throughout.

IAs, because of the inclusion of the public's rights to participate and information, are also critical in advancing environmental justice.

IAs became law throughout the 70s and 80s and now, are among the most widely practiced environmental management tools in the world.

Initially, IA was meant to ensure the environmental consequences of major development proposals were considered BEFORE development, during the decision-making stage.

Now, IA has been grown to encompass more than just environmental impacts, but includes social impact assessments, health impact assessment, strategic and sustainability assessments.

There is no one definition of IA, but broadly speaking it's a process to identify, predict, evaluate, mitigate the physical, social, impacts of a project – and potentially improve social and ecological conditions – again, BEFORE major decisions or commitments are made.

Fundamental to any IA, is its consideration of cumulative effects and alternatives to the project.

## **Why isn't the ARC-100 getting an impact assessment?**

As a result of changes to Canada's federal environmental assessment law in 2019, new-nuclear reactor projects below a certain threshold were removed from requiring an impact assessment (IA).

As a result, only reactors greater than 200 megawatt thermal (MWth) - or 900 MWth if on an existing nuclear site - require an IA. Because of this threshold, it means small modular nuclear reactors (SMRs), which generally produce up to 300 MW of electricity can escape review under the Impact Assessment Act (IAA).

The 'Project List' regulation as it is more commonly known, was released in May 2019 and it sets out the projects to which federal impact assessment (IA) applies. By virtue of the IAA's approach to triggering, wherein projects are reviewed 'only in if included' on the Project List, there has been a narrowing of and reduction in the number of projects requiring federal review.

Currently, only new nuclear reactor projects exceeding 200 MWth, or 900MWth should the project be located on an existing nuclear facility site, require an impact assessment.

## **How is an impact assessment different than nuclear licensing?**

Relying only on the Canadian Nuclear Safety Commission's (CNSC) licensing review process to provide insight on a project's impacts is a major step backwards for the environment, the communities wishing to be engaged in decision-making, and our ability to test a proponent's claims with respect to impacts.

Unlike an IA which considers a project's full lifespan, the CNSC's licensing process is narrowly defined by the stage of activity being licensed. For instance, the IA process reviews all activities within the lifespan of the project, from development through to decommissioning, including impacts of projects which are 'direct or incidental' to the project, (e.g., the construction of new waste storage or aquatic infrastructure for discharge) prior to any decision being made regarding its development. An IA also includes mandatory considerations, like whether a project will contribute to sustainability, the project's purpose and need, and alternatives that may achieve the same end goals.

The CNSC's licensing process is narrowly defined by the stage of activity being licensed and the life-cycle, which is divided into five licence categories for: (1) site preparation, (2) construction, (3) operations, (4) decommissioning; and (5) abandonment. These stages of licensing may be spaced decades apart and viewed in isolation, meaning detailed information about impacts from the operations of the reactor and the eventual decommissioning of the reactor and site where it is located could be spaced many decades apart.

## **Is a provincial environmental impact assessment the same as a federal IA?**

No, the provincial EIA is limited in scope compared to an IA; many of the issues we are concerned about would not be reviewed by an EIA in New Brunswick. For instance, the proponent has proposed to build a fleet support centre for the deployment of ARC SMRs elsewhere in Canada, use the SMR to produce hydrogen for international markets (like Germany), and aims to dispose of the reactor's waste in a proposed deep geological repository in Ontario. The New Brunswick EIA process is limited to considering impacts which would occur within the province of New Brunswick. As a result, it would not provide a forum to raise concerns, seek information or provide evidence on impacts affecting other provinces or countries.

The concerns raised by the Ontario groups We the Nuclear Free North and Protect our Waterways that collaborated to submit this request, could not be considered by a New Brunswick EIA.

## **Is there any way to request an IA if one isn't required?**

Yes, the public can request the federal Minister of the Environment, per section 9 of the IAA to designate a project for review if one is not required under the 'Project List.' However, the request for an impact assessment must be made BEFORE any other federal review process has begun. For more information, visit the Impact Assessment Agency's guidance document [HERE](#)

## What can I do?

- Share information about this campaign to your friends and family.
- Write a letter to Minister Guilbeault using this [TEMPLATE](#).
- Use our action tool to write a form letter to Minister Guilbeault, and other federal and provincial representatives, including your MP. (We are collaborating with the Ontario Clean Air Alliance on this action):
- [Click here for the action tool and quickly write and send a letter of support for our request for an impact assessment for the ARC-100 project](#)

Thanks for sharing this information!

April 2023 - This document is shared by the Coalition for Responsible Energy Development in New Brunswick.

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