



June 29, 2022

Hon. Steven Guilbeault
House of Commons
Ottawa, Ontario,
Canada
K1A 0A6

Re: Small Modular Reactor Project, New Brunswick - Request for designation under s. 9 of the Impact Assessment Act

Dear Minister:

The Conservation Council of New Brunswick (CCNB) respectfully requests that you exercise your authority pursuant to section 9(1) of the Impact Assessment Act ("IAA") to designate the proposed Small Modular Reactor (SMR) demonstration project at Point Lepreau, New Brunswick (the "project") for a federal impact assessment.

CCNB supports the submission of the Coalition for Responsible Energy Development (CRED) and its assessment that the novel nature of the proposed small modular nuclear projects, the size of the projects, the potential for significant cumulative effects, and the need to fully engage Indigenous communities require a federal impact assessment. A provincial environmental impact assessment alone is not appropriate in the circumstance given the need to avoid adverse environmental effects in areas of federal jurisdiction and offers no guarantee of public consultation.

CCNB wishes to highlight from the CRED submission that:

- Moltex Energy proposes to develop a pyroprocessing technology to access irradiated CANDU fuel, turn the solid fuel rods into a liquid form, remove the plutonium, and use that as new fuel for the SSR-W SMR design. Currently, no industrially proven method exists to convert used fuel to molten metal alloys, as claimed by the company.
- The liquid sodium coolant from the proposed ARC SMR will become a new category of liquid radioactive waste, posing special problems that promise to be very expensive. Radioactive waste fuel from liquid sodium reactors like the ARC-100 SMR must be treated before it can safely be disposed. This involves removing the sodium in order to prevent underground explosions, because sodium reacts violently on contact with air and water, and water inevitably seeps into underground cavities like mines and deep geological repositories.
- The combined thermal capacity of the new nuclear reactors would be 1036 MW. Taking into account the existing Point Lepreau nuclear generating station, the site's total capacity would be 3216MW. By virtue of the two SMR designs combined exceeding the 900MWth as set out in the Project List, the Minister ought to designate the project for an impact assessment.

We cannot rely on the Canadian Nuclear Safety Commission's licensing process alone, as its scope is too narrow to encompass a comprehensive review of cumulative social, cultural, Indigenous and human rights impacts, and it altogether does not consider the need or purpose of the project nor alternatives.

Respectfully,

A handwritten signature in blue ink, reading "Louise Comeau". The signature is written in a cursive style with a large initial "L".

Louise Comeau
Director Climate Change and Energy Solutions