

Coalition for Responsible Energy Development in New Brunswick

October 27, 2020

Hon. Jonathan Wilkinson, Minister of Environment and Climate Change
Rt. Hon. Justin Trudeau, Prime Minister
House of Commons
Ottawa, ON K1A 0A6

Dear Minister Wilkinson and Prime Minister Trudeau:

Thank you for the reply dated July 28, 2020. It has presented us with further concerns that we feel must be addressed to arrive at solutions to the climate emergency that the *Coalition for Responsible Energy Development in New Brunswick* considers threatening for the future wellbeing of Canadians.

A deeply concerning problem is that Bill C-69 lacks fundamental legislative authority since none of the recommendations made by the Environmental Assessment Expert Panel headed by Johanne G  linas were enacted by your government. The result is that the Harper government's 2012 omnibus bills C-38 and C-45 that your government promised to change prior to the 2015 election is essentially still in effect, thereby leaving Impact Assessments (IA) entirely in favour of industrial polluters with unprecedented freedom of ministerial discretion and extended timelines due to the failure of your government to act on this determining bill.

The critical climate crisis requires both clear and effective government strategies in mitigative and adaptive legislation so as to provide responsible and effective protection to present and future generations from an inhospitable environment. This also applies to all nature that humans depend on for survival.

Time is of the essence. This is the reason why the advocacy and promised federal funding for small modular nuclear reactors (SMNRs) in New Brunswick and Ontario is so perplexing. Anyone interested in evidence-based policy is wondering why you are doing this when there is no evidence that new nuclear power will work or achieve carbon reduction targets, and especially given there is considerable research indicating the contrary?

In fact, Natural Resources Minister Seamus O'Regan has confirmed that the new reactor prototypes still early in their design phase in NB and Ontario will take more than a decade to develop and will contribute nothing toward meeting Canada's 2030 target for reducing greenhouse gas emissions. Surely you realize that SMNRs will play little or no part in meeting Canada's 2050 net-zero emissions target as well. You must also be realizing that clean renewable energy (RE) is working and available now. To improve RE performance the focus should be on efficiency and energy storage systems; this is a much better investment that will

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bring the necessary lower emissions, far more jobs for Canadians than with nuclear development, and a return on the investment.

Choosing to allocate public funds to SMR development not only props up the declining nuclear sector, it does so at the expense of renewable energy resources that are already scalable and provide safer, less costly, and more effective and socially acceptable sources of energy. This link to the University of Sussex study on October 5, 2020, concluded that nuclear and renewables do not mix. <https://techxplore.com/news/2020-10-crowd-nuclear-renewables-dont.html>

In your letter you cited the criteria by which SMR projects are subject to the Impact Assessment Act (IAA) “that takes into consideration the whole range of environmental, health, social and economic effects to the environment.” As well, you named the Physical Activities Regulations (Project List) that “focuses on classes of projects with the greatest potential for adverse effects in areas of federal jurisdiction related to the environment.”

If this is so, CRED-NB requests the documentation that led to the decision to exclude SMNRs from IA protocols and to release the research and data that supports it. We contend that the Project List erred in approving the Point Lepreau site for the Moltex SSR 300 MWe and the Arc 100 MWe SMR units by using thermal measurement criteria incorrectly for the following reasons:

- The hazards of nuclear reactor accidents are not related to the “power” of the reactor, but to the inventory of radioactive poisons inside the reactor. There is, if anything, MORE radioactivity in the spent fuel of these smaller modular reactors than there is in the larger Point Lepreau reactor — that is, a reactor producing HALF the power of Lepreau (such as the Moltex SSR 300 MWe) will have MUCH MORE than half the radioactive inventory inside the reactor. If this material is released into the environment the consequences can be serious and potentially catastrophic. That is why it makes no sense NOT to have an environmental impact assessment.
- The CANDU 6 reactor at Point Lepreau emits 49 radionuclides into the air and 42 radionuclides into the water (same as Gentilly-2 did when it was operating, see www.ccnr.org/G-2_emissions.pdf). The designers of all seven SMNRs in Canada need to release publicly what emissions their prototypes will produce and prove that those emissions are not harmful to the air and water that humans and wildlife breathe and drink during operation, and for the millennia following retirement from service.
- Dr. Gordon Edwards (Canadian Coalition for Nuclear Responsibility) said, “Recycling or reprocessing nuclear waste to create plutonium-based fuel for SMRs would produce more toxic solid & liquid waste by-products and would make it even more difficult to prevent the proliferation of nuclear weapons around the world.” Nuclear power has intrinsically been tied to nuclear military weapons ever since the 1943 Quebec Agreement between Canada, Great

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Britain and the USA and is still showing no signs of coming to an end with the Canadian government's misguided decision to fund SMNRs. The new nuclear technology now being developed certainly will increase the threat of nuclear war and nuclear terrorism. Transporting SMRs and their fuel on Canadian roads, highways, rails or waterways to remote areas would create a safety hazard, needlessly increasing the threat of nuclear terrorism.

The "next generation" nuclear reactors are a dirty, dangerous and unethical distraction from tackling the climate crisis. Nuclear energy is not green, not clean, too costly and too late.

Sincerely,

Samuel Arnold and David Thompson

For the *Coalition for Responsible Energy Development in New Brunswick*

cc: Seamus O'Regan, Minister of Natural Resources
Chrystia Freeland, Minister of Finance
Richard Cannings, NDP Critic for Energy and Natural Resources
Annamie Paul, Leader, Green Party of Canada
Jenica Atwin, MP for Fredericton, NB
Greg McLean, PC critic for Natural Resources and Northern Economic Development
Mario Simard, BQ Ressources Naturelles
Blaine Higgs, Premier of New Brunswick
Gary Crossman, NB Min. of Environment and Climate Change
Mike Holland, NB Min. of Energy and Resource Development
Roger Melanson, Acting leader of the NB Liberal Party
David Coon, Leader of the NB Green Party
Kris Austin, Leader of the People's Alliance Party