

Maritime Aboriginal Peoples Council

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The Maritime Regional Aboriginal Leaders
Intergovernmental Council of Aboriginal Peoples
Continuing to Reside on Traditional Ancestral Homelands

Forums

September 13, 2019

- Leaders Congress
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RE: Comments on the Project Description for the Micro Modular Reactor Project at Chalk River (No.: CRP-LIC-01-001, Rev. 2)

The Maritime Aboriginal Peoples Council is opposed to the project described in the *Project Description for the Micro Modular Reactor Project at Chalk River* (No.: CRP-LIC-01-001, Rev. 2, dated 2019/07/08) proposed by Global First Power.

The Maritime Aboriginal Peoples Council is the intergovernmental leaders forum of the Native Council of Nova Scotia, New Brunswick Aboriginal Peoples Council, and the Native Council of Prince Edward Island, collectively advancing the Aboriginal and Treaty rights and interests of the Section 91.24 Indian Mi'kmaq/Maliseet/Passamaquoddy/Aboriginal/Indigenous Peoples continuing to reside on Traditional Ancestral Homelands and Territories (off-reserve) throughout modern day Nova Scotia (42,145 persons), New Brunswick (21,920 persons), and PEI (3,485 persons) (2016 Census Canada Aboriginal Identity numbers).

Though the Chalk River project does not occur within the Traditional Ancestral Homelands and Territories of the Mi'kmaq, Maliseet, or Passamaquoddy Peoples, we have a vested interest in projects who's pollution may impact our lands, waters, air, or biodiversity. We lodge three primary oppositions to the project and to Small (and Micro) Modular Reactors (SMRs) in general.

1. We are particularly concerned about projects which generate long-lived wastes, where even remote chances of release may have long-lasting damaging effects.

The proponent writes: "All waste will be handled and processed in a responsible and safe manner that ensures minimum exposure to all personnel handling, transporting and processing the waste". They later add: "Waste will be temporarily stored on the Project site in defined areas and transported to authorized processing facilities at appropriate times, dependent on the category and type of waste."

We do not have permanent storage capacity for intermediate or high-level waste in Canada. We have so-called intermediate storage facilities, but despite their long lifespans, they will not last long enough to contain the potential chemical and radiological contamination of this waste. There are several long-term repositories proposed, but they are, at this point, hypothetical. What are the "authorized processing facilities" the proponent intends to use for processing and storage of wastes and when is the "appropriate time" those will be removed from the on-site short-term storage facilities? There is no guarantee that the long-term deep geological storage facilities will be approved, and then no guarantee that they will be completed, or on what schedule. Even these deep geological repositories are not a solution but only an exporting of today's waste to future generations for them to worry about and possibly be exposed to.

There is no nullifying the adverse potential of nuclear waste, other than to wait for thousands or hundreds of thousands of years, and then there is still the chemical contamination to be dealt with. It is highly irresponsible to undertake any project without assessing its full impacts, including what is the final resting place of waste and when is the waste no longer a concern.

2. We are also opposed to SMRs on the grounds that it is well recognized by learned climate scientists and environmental scientists around the world, that nuclear power generation does in fact have a large environmental footprint, including large amount of greenhouse gas generation during construction of facilities, mining of ore, processing of ore into fuel rods, and storage of waste fuel. It is simply inaccurate and a misrepresentation to say that nuclear power is clean or that it is a part of the answer to the global climate crisis.

Nuclear power is also the most high risk and costly electrical generation option, supported only by massive subsidies. Assessments of nuclear incidents put damages into the hundreds of billions of dollars each. Yet, governments limit liability to only a small fraction of that, the remaining to be borne by the environment and the public. No insurance company will offer insurance to cover the cost of a major nuclear accident. If the liability were borne by rate payers, the public outcry would be swift and resolute that the public wants cheaper, less risky energy. For these reasons and others, including the desire to lessen nuclear proliferation at its source, the world is moving away from nuclear power.

3. We are opposed to the proliferation of small or micro modular nuclear reactors. If management of nuclear power concentrated into a large facility is extremely costly, risky, and requiring highly technical and exacting engineering and operations staff, then how is that compared to what would be required to safely operate many small or micro modular nuclear reactors spread around Canada. We understand that this project is proposed to be undertaken at the Chalk Rivers Laboratories and we expect that would benefit from decades of expertise, but we do not see other municipalities lining up to invest millions of dollars in scientific, engineering, and technical capacities necessary to oversee or guard the safety and interests of residence during the construction, operation, and waste management of nuclear facilities in their communities. Also, what level of expertise exists outside of large nuclear reactor facilities and nuclear laboratories to safely operate an SMR for a municipality, industrial park, or as a replacement for a fossil fuel fired power station?

We are also concerned about the proliferation of nuclear materials. For very obvious reasons, security of nuclear fuel, technology, and wastes is paramount for a large nuclear power plant and, for example, the US Navy closely guards its shipboard SMR propulsion/power systems. What assurances can the CNSC provide that privately owned/operated SMRs spread across Canada, and their business suppliers, will maintain the very high level of security expected from the military and large nuclear facilities?

We are also aware of the 2018 "Call to Action SMR Roadmap" by Ontario Power Generation, the AECL, Bruce Power, the Government of Ontario and others as the Canadian Small Modular Reactor Roadmap Steering Committee. We disagree with the obvious self-interest conclusions generated in the report, in particular misrepresentation or overstating of potential benefits, no discussion on risks other than to say "they don't think there are any", and the report's general tone that "the only people who do not support nuclear power are less educated, poorer, and women" and their proffering that "if opponents had an SMR in their community they would support it". We oppose the brainwashing of Canadians to nuclear power by roadmap to install a SMR in every community or region.

We are particularly concerned where Nova Scotia still operates four coal/coke fired electrical generation plants and a further four fuel oil fired plants, with only one turbine in one plant burning the much cleaner fossil fuel of natural gas, but even that is only for half of the year when natural gas prices are competitive with coal and oil. Nova Scotia is under significant pressure from the Canadian Environmental Protection Act and the Coal-fired Electricity Regulations to close down the aging, polluting plants, yet the Nova Scotia Government continues to prolong compliance through a series of "equivalency agreements". Yet, renewable energy is problematic in Nova Scotia, where grid infrastructure is inadequate, with no significant upgrade to move toward a "smart grid" and where renewable energy projects are held back, despite considerable public interest. Despite a moratorium on uranium mining in Nova Scotia, which was sought by Nova Scotians because of environmental risks, including the risks associated with nuclear power, we are

concerned that the situation in Nova Scotia is ripe for the Provincial Government to propose an “off-the-shelf solution” of SMR to quickly replace our aging fleet of fossil fuel power generation stations, when the can cannot be kicked any further down the road of equivalency agreements.

PEI faces similar challenges. The New Brunswick Government proudly proclaims that it is open for nuclear power business, including SMRs. That confidence is based on experience with one highly contentious nuclear power plant that has had its share of very costly repairs, cost overruns, extended down-times, and still no long-term solution for its wastes.

Advancing, Promoting and Advocating the Reality of the
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