November 28, 2022

Honourable Steven Guilbeault
Minister of Environment and Climate Change
800 Boul de Maisonneuve E, Suite 1010
Montréal, Quebec
H2L 4L8

Subject: Designation Request for the Demonstration of the ARC-100 Small Modular Reactor, New Brunswick

Honourable Minister Guilbeault,

On behalf of the Atlantica Centre for Energy, I am writing to you regarding the designation request for the potential ARC-100 commercial demonstration in New Brunswick.

The Atlantica Centre for Energy is a community-based, non-profit organization dedicated to exploring issues in the energy sector and assessing their impacts on the Atlantic region. Our community partners represent the largest employers, and energy producers, distributors and consumers in the region. The Centre is comprised of a cross section of the community, taking a balanced approach to energy development and the dissemination of fact-based energy information.

In line with the thresholds identified in the *Physical Activities Regulations* under the *Impact Assessment Act,* the Centre requests that an Impact Assessment **not** be designated for the potential ARC-100 commercial demonstration unit.

It is expected that the application of a graded approach to assessing new nuclear projects appropriate to their size, and it is understood that an ARC-100 commercial demonstration unit will undergo a robust environmental assessment, including a panel review and public hearing, under the New Brunswick *Environmental Impact Assessment* process.

The Centre places trust in this process, which includes oversight from Canada's world-class lifecycle nuclear regulator, the Canadian Nuclear Safety Commission, will provide a comprehensive assessment. It is also understood that the scope of the baseline characterization and environmental assessment will meet the requirements identified in the federal Impact Assessment process, as guided by the Tailored Impact Statement Guidelines for projects subject to the Nuclear Safety and Control Act, with an anticipated shorter timeline of approximately two years. This is significant for a potential commercial demonstration and in contributing to greenhouse gas (GHG) reductions.

Should the commercial demonstration project facilitate the potential of further deployment, it is understood new projects will undergo assessments relative to the size and location proposed at the time.

Acknowledgement should be taken into account that the proponent, NB Power, along with the vendor, ARC Clean Technology, have been engaging with Indigenous communities and the public during the pre-project phase over the past five years for a potential ARC-100 commercial demonstration unit and that this engagement will continue during the environmental assessment activities.

The Centre has been actively following the progress by NB Power and ARC Clean Technology for several years and recognizes nuclear energy will continue to play an important role in providing clean electricity to New Brunswickers and help achieve the region's climate action goals.

The Point Lepreau Nuclear Generating Station (PLNGS) is New Brunswick's largest provider of carbon-free energy; it provides approximately one third of the province's electricity requirements and avoids approximately 4 Mt of greenhouse gas from being emitted into the environment annually.

To be successful in achieving net zero carbon emissions by 2050, all forms of clean energy must be pursued, including nuclear. Going forward, the development of small modular reactors (SMRs) represent an opportunity to deliver low-carbon electricity safely, reliably, and inexpensively.

Canada has established a short timeframe to develop new technologies and achieve its climate action goals. It is imperative that progress is not delayed by applying processes that are not commensurate with the size of potential projects, especially in the presence of existing rigorous environmental assessment processes in the provincial jurisdiction and oversight from additional provincial and federal regulators.

Sincerely,
<Original signed by>

Michelle Robichaud, President

27 Wellington Row, Saint John, New Brunswick, Canada, E2L 3H4
506.674.9439 info@AtlanticaEnergy.org