



Atlantic Clean Energy Alliance
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November 28, 2022

Honourable Minister 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

Dear Minister Guilbeault,

On behalf of the **Atlantic Clean Energy Alliance (ACEA)**, I am writing to you regarding the designation request for the potential ARC-100 commercial demonstration in New Brunswick.

ACEA is a stakeholder consortium representing the private sector, the University of New Brunswick, NB Power, community partnerships, and government enablers. The Alliance provides stakeholder and community support related to the energy, environmental and economic benefits and opportunities associated with successful development of Small Modular Reactors (SMR) and complementary clean energy technologies in the region.

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

We respect the application of a graded approach to assessing new nuclear projects appropriate to their size and understand 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.

We trust that this process, which will include oversight from Canada's world-class lifecycle nuclear regulator, the Canadian Nuclear Safety Commission, will provide a comprehensive assessment. We also understand 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 facilitate the potential of further deployment, we understand new projects will undergo assessments relative to the size and location proposed at the time.



We also wish to acknowledge 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 Alliance supports New Brunswick's positioning as the centre for excellence for Generation-4 SMR technology development and deployment, as well as advocating for the inclusion of SMR technology as part of regional, national and international climate change and greenhouse gas reduction strategies.

As it has for the past forty years, nuclear energy will continue to play an important role in providing clean electricity to New Brunswickers and helping us all achieve our 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, we need to pursue all forms of clean energy, 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 we do not delay progress 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.**

Regards,

<Original signed by>

Colleen d'Entremont, Chair