



Inter-Church Uranium Committee Educational Cooperative

P.O. Box 7724 Saskatoon, SK S7K 4J2

The Honourable Steven Guilbeault
Minister of Environment and Climate Change

June 30, 2022

Letter of Support Request to Designate New Brunswick SMR Demonstration Project for an Impact Assessment

Dear Minister Guilbeault,

The Inter-Church Uranium Committee Educational Cooperative [ICUCEC] offers its full support for the Coalition for Responsible Energy Development in New Brunswick's (CRED-NB) request for an impact assessment (IA) of the small modular reactor (SMR) demonstration project in New Brunswick.

ICUCEC exists to achieve the following goals:

- ◆ To educate people in Saskatchewan and elsewhere about the many peace, environmental and health issues arising from the mining of uranium in Saskatchewan and the nuclear industry world-wide.
- ◆ To be a voice for people, especially First Nations' and Metis' communities, affected by the uranium industry in Saskatchewan.
- ◆ To prevent the further expansion of the uranium/nuclear industry in Saskatchewan.
- ◆ To stand in solidarity with others opposing the nuclear industry across Canada and around the world.
- ◆ To bring about the ecologically sound stewardship of Saskatchewan uranium mine tailings, and just reparations to those who have been affected by the uranium industry in Saskatchewan from the 1950's to the present.
- ◆ To support economic development alternatives in and for Northern Saskatchewan
- ◆ To promote alternative sustainable energy options

ICUCEC strongly supports this request and asks that you designate the project for an IA. Since our founding in 1979 we have had to be a nuclear "watchdog" in Saskatchewan because the CNSC (and its predecessor bodies) is a captured regulator and in the words of CNSC's previous president, Michael Binder, serves "to promote and promulgate the nuclear industry." ICUCEC has even taken CNSC (Canadian Nuclear Safety Commission) to court over its failure to abide by its own regulations. The only way the five pillars of the Canadian Impact Assessment Act of 2019 - environmental, health, economic, social, cultural - can be met with respect to SMRs is through opening them to an Impact Assessment.

ICUCEC has a direct interest in this matter as Saskatchewan has signed a Memorandum of Understanding with New Brunswick, Ontario, and Alberta and prepared “A Strategic Plan for the Deployment of Small Modular Reactors.” Many crucial questions are raised which so far the federal and provincial governments and regulators have failed to address. Some of the most important are:

- ◆ We have seen no evidence that an independent peer review has been conducted of the plans for the SMNR technologies you are promoting. Do you have such evidence?
- ◆ Have the federal and provincial legislatures, with adequate parliamentary debate, addressed the sanity of building new nuclear reactors when there are no approved long-term storage facilities anywhere in Canada for the radioactive waste from existing reactors?
- ◆ Has the government considered the risks involved in using “advanced” nuclear fuels? Both the use of plutonium and enriched uranium as fuels will require new levels of safety and security beyond those required for existing CANDU reactors and more extensive decommissioning procedures.
- ◆ Given plans to sell these new reactors abroad, has sufficient consideration been given to the danger of nuclear weapons proliferation with the use of plutonium-based fuels?
- ◆ The industry and supporting governments anticipate “recycling” of existing used nuclear fuel to extract plutonium through reprocessing or pyro-processing technology. Has your government investigated the extraordinary costs and difficulties in dealing with the radioactive waste streams resulting from such activities?

On this basis, we offer our full support to CRED-NB’s request for an impact assessment of the SMR demonstration project in New Brunswick.

Regards,
Michael Poellet, President
Inter-Church Uranium Committee Educational Cooperative