

To: [Consultation \(CNSC/CCSN\)](#)
Subject: Comments on REGDOC-1.1.5: Licence Application Guide: Small Modular Reactor Facilities
Date: November-01-18 1:01:35 PM
Attachments: [Letter to CNSC.docx](#)

Hello,

Please find attached a document containing my response to the SMR license application.

Best,
Natalie Sutt-Wiebe

Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
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Ottawa, Ontario
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To Whom It May Concern,

I have multiple points of concern about the possibility of Canada developing a SMR program. They are as follows:

1) There has been a failure to uphold the duty to consult

So far, only industry insiders have been invited by the government to discuss the development of an SMR program in Canada, excluding civil stakeholders as well as environmental groups. If the government of Canada means to develop such a novel method of energy creation, it should be done with full transparency to the public.

Further more, the government has proposed through Bill C-69, *The Impact Assessment Act*, to change Canada's environmental assessment practices as well as increase the consultation rights of Indigenous peoples. This bill is still undergoing consultation, so any major changes to Canada's energy scene should be halted until the new environmental assessment laws are in place.

2) There are alternative, better technologies currently available

There are no SMRs are currently in operation so the application of this technology is still theoretical, as are the potential costs. The nuclear industry has argued that SMRs will be cheaper than traditional reactors. However independent academic studies have shown that SMRs could be more expensive than large reactors, and these large reactors are still more expensive than renewable energy sources like solar, wind and hydroelectricity. Furthermore, these renewable energy sources do not carry the safety risks associated with nuclear energy.

3) There is no discussion of how the nuclear waste would be managed

The draft released by the Canadian Nuclear Safety Commission does not mention how the increase in nuclear waste will be managed. This is an important concern, especially if these reactors are built in Northern Ontario's Ring of Fire where mining corporations have a history of improperly storing industrial waste. If there were transparency and engagement with local civic stakeholders, these issues could be more properly addressed.

Sincerely,
Natalie Sutt-Wiebe

