

PROVINCIAL COUNCIL OF WOMEN OF ONTARIO
(Established 1923)

**To: Consultation (CNSC/CCSN) Subject: COMMENTS: REGDOC-1.1.5, Licence Application
Guide: Small Modular Reactor Facilities November 20, 2018**

Directorate of Regulatory Improvement and Major Projects Management Canadian
Nuclear Safety Commission cnsconsultation.ccsn@canada.ca

It has come to the attention of the Provincial Council of Women of Ontario that the Canadian Nuclear Safety Commission , through its Directorate of Regulatory Improvement and Major Projects Management, is moving quickly ahead with plans for the wide-spread, ad hoc licensing of small modular nuclear reactors in the absence of a comprehensive, publically presented plan that has been subject of an comprehensive environmental assessment .

Currently these small modular nuclear reactors fall within the scope of the “new” Canadian Environmental Impact Act and should remain there, rather than be exempt as this CNSC discussion paper clearly describes.

Both the Provincial Council of Women of Ontario and the National Council of Women of Canada have strong policies regarding the dangers presented in all stages of the nuclear life cycle, and the need for complete Federal, or joint Provincial, Territorial and Federal Environmental Assessments of nuclear projects.

PCWO is aware that until recently CNSC was to be the Regulator and the Approval Authority for Federal Canadian Environmental Assessment Panel Hearings on nuclear project applications, and we are pleased that the Minister of Environment’s Expert Panel determined that CNSC ‘s relationship to the industry it regulates is too close, and this responsibility has been lifted from the Commission. PCWO is concerned in this case though, that the relationship between the regulator and small modular nuclear reactor industry is not only too close, but CNSC is guiding the licence applicants ahead with no set rules and considerable encouragement , but no overall properly developed national precautionary plan .

To conclude, PCWO has read and agrees with the submissions of Northwatch, the Canadian Environmental Law Association (CELA), Concerned Citizens of Renfrew County and Greenpeace, and we are of the strong opinion that CNSC’s plan to assess each individual vender’s application on such a casual case-by-case basis, and to have these projects exempt from the new Environmental Impact Act, is arbitrary, biased towards nuclear projects, and not properly protective of the environment and the health and wellbeing of Canadians.

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