



**Canadian
Environmental Law
Association**
EQUITY. JUSTICE. HEALTH.

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DELIVERED VIA EMAIL

January 13, 2022

The Honourable Steven Guilbeault
ministre-minister@ec.gc.ca

Dear Mr. Guilbeault,

Re: No Role for Small Modular Reactors in Climate Crisis Plans

The Canadian Environmental Law Association (“CELA”) is writing to strongly oppose any role for small modular reactors (“SMRs”) in a net-zero climate crisis plan.

CELA is a legal aid clinic focused on ensuring low-income and vulnerable people are front and centre in environmental decision-making and environmental laws. The climate crisis requires immediate action. It is not only an environmental and health crisis, but also an equity crisis. Low-income and vulnerable communities, especially in Northern and remote areas of the country, are disproportionately affected by the climate crisis.

SMRs do not assist in meeting any near-term or long-term net zero emissions reduction goals. They are fraught with environmental and health risks, yet are excluded from Canada’s *Impact Assessment Act*, depriving Indigenous peoples and affected communities from participating in decision-making about their use. They are also not immune from accidents; SMRs carry the risk of widespread contamination from spills and needlessly present new and serious proliferation risks contrary to Canada's international commitments. SMRs will result in more radioactive nuclear waste.

SMRs are significantly more expensive than renewable alternatives, which are available to meet the needs of remote and off-grid communities. Any focus on SMRs diverts needed support away from available and cheap renewable generation technologies like wind and solar energy, which are socially acceptable, cost effective and scalable.

CELA has written extensively about our concerns regarding SMRs. Our previous submissions are found on our website here: <https://cela.ca/law-reform-climate-action-nuclear-energy-case-against-smrs/>

We urge the Government of Canada to avoid any support for SMR technology and instead focus on renewable technologies. All climate crisis planning must focus on the legal tools that best support low-income and vulnerable communities.

Canadian Environmental Law Association

T 416 960-2284 • 1-844-755-1420 • F 416 960-9392 • 55 University Avenue, Suite 1500 Toronto, Ontario M5J 2H7 • cela.ca

Yours Sincerely,

CANADIAN ENVIRONMENTAL LAW ASSOCIATION



Theresa McClenaghan
Executive Director



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Student-at Law