

**Disposition Table of Public and Indigenous Groups' and Organizations' Comments on the Project Description– Micro Modular Reactor Project**

No.	Theme	Source	<p align="center"><b>Comment Summary</b></p> <p align="center">(all original submissions can be found on the Canadian Impact Assessment Registry, <a href="#">reference #80182</a>)</p>	<p align="center"><b>CNSC Response</b></p>
<p><i>Note: Comments submitted of general support or opposition to the project have been noted, but are not reflected below.</i></p>				
IEC1	Indigenous Engagement and Consultation	<a href="#">Algonquins of Pikwakanagan First Nation</a> (AOPFN)	<p>The AOPFN made several requests to the CNSC, including wanting their own separate consultation process with the Crown. AOPFN requests the CNSC to require the proponent to:</p> <ul style="list-style-type: none"> <li>• Provide a summary of AOPFN engagement performed by Canadian Nuclear Laboratories (CNL) in support of Global First Power's (the proponent) current proposal. Identify any issues raised by AOPFN during this engagement and how the Proponent has responded or plans to act to deal with these concerns. <b>[Request 10]</b></li> <li>• Provide a copy of any other Indigenous engagement plan for our consideration. <b>[Request 11]</b></li> <li>• Provide documentation of the preliminary rights assessment and indicate whether the AOPFN were consulted during this assessment. <b>[Request 12]</b></li> <li>• Provide a description of how they intend to collect and utilize Traditional Knowledge for the EA and throughout the life cycle of the proposed project. <b>[Request 13]</b></li> </ul>	<p>The common law duty to consult with Indigenous peoples applies when the Crown contemplates actions that may adversely affect potential or established Indigenous and/or treaty rights. The Canadian Nuclear Safety Commission (CNSC) ensures that all of its environmental assessment (EA) and licensing decisions under the <i>Canadian Environmental Assessment Act 2012</i> (CEAA 2012) and the <i>Nuclear Safety and Control Act</i> (NSCA) uphold the honour of the Crown and consider Indigenous peoples' potential or established Indigenous and/or treaty rights pursuant to section 35 of the <i>Constitution Act, 1982</i>.</p> <p>CNSC staff have identified First Nation and Métis groups and organizations who may have an interest in the project and provided each identified group and organization with a notice of the commencement of the EA and a copy of the project description for comment.</p> <p>CNSC staff are committed to ongoing consultation and engagement with Indigenous groups and organizations in relation to this proposed project and will be working collaboratively with all Indigenous groups and organizations in order to ensure that they are meaningfully involved throughout the EA and licensing processes, including developing community specific consultation plans, where appropriate. The availability of the second phase of participant funding will be announced within the next few months (around the same time as the Commission makes its decision on the scope of the EA). CNSC staff will continue to communicate with Indigenous groups and organizations in a timely manner about funding opportunities.</p> <p>CNSC staff are committed to working with AOPFN to describe the preliminary information on AOPFN rights and interests that were gathered as part of CNSC's pre-consultation analysis work, as well as describe CNSC's approach and expectations with regards to the gathering and assessment of Indigenous Knowledge for this project.</p> <p>CNSC staff acknowledge the importance of working with and integrating Indigenous knowledge (IK) alongside western scientific and regulatory information in its assessments and regulatory</p>

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				<p>processes, where appropriate and when authorized by Indigenous communities. Indigenous ways of knowing and cultural context enhance the CNSC's understanding of potential impacts of projects and strengthens the rigour of project reviews and regulatory oversight.</p> <p>CNSC staff have noted these comments, and have shared them with the proponent (Global First Power). In accordance with the CNSC's <a href="#">REGDOC-3.2.2, Indigenous Engagement</a> and the <a href="#">Generic Guidelines for the Preparation of an Environmental Impact Statement pursuant to the Canadian Environmental Assessment Act, 2012</a> (EIS Guidelines), it is CNSC staff's expectation that proponents engage with Indigenous groups whose Indigenous and/or treaty rights may be impacted by the project and considers gathering and working with IK as part of their project design and regulatory review process. It is CNSC staff's expectation that the proponent works directly with Indigenous communities and knowledge holders on gathering, incorporating and reflecting IK in their project design, operations, reports and monitoring, where appropriate. It is also CNSC staff's expectation that the proponent review and address concerns and requests through ongoing engagement with all Identified Indigenous groups and organizations, including the AOPFN, during the development of the draft Environmental Impact Statement (EIS). The proponent is to provide details within the EIS as to how specific requests, issues and concerns raised were addressed and mitigated. The proponent is to provide updates on these activities in the EIS and in future iterations of their Indigenous Engagement Report. It is CNSC staff's expectation that the proponent share the draft Indigenous Engagement Report with identified groups.</p> <p>It is also CNSC staff's expectation that engagement activities need to remain flexible to the group or organization in question and that seeking input from those being engaged with will be vital to building and maintaining relationships of all parties involved.</p>
IEC2	Indigenous Engagement and Consultation	<a href="#">Algonquins of Ontario</a> (AOO)	<p>The AOO states that impacts from Chalk River Laboratories (CRL) and related projects have affected Algonquin people since 1944 (when they were not originally consulted or accommodated on the siting of facilities on lands currently overseen by CNL and managed by Atomic Energy of Canada Limited (AECL) representing the Crown). Impacts from the currently proposed MMR project from the proponent and other projects will continue to affect the AOO well into the future. For this rationale, it is necessary to establish formal consultation and accommodation process between AOO and the proponent.</p>	<p>The common law duty to consult with Indigenous peoples applies when the Crown contemplates actions that may adversely affect potential or established Indigenous and/or treaty rights. The CNSC ensures that all of its EA and licensing decisions under CEAA 2012 and the NSCA uphold the honour of the Crown and consider Indigenous peoples' potential or established Indigenous and/or treaty rights pursuant to section 35 of the <i>Constitution Act, 1982</i>.</p> <p>CNSC staff have identified First Nation and Métis groups and organizations who may have an interest in the project and provided each identified group and organization with a notice of the commencement of the EA and a copy of the project</p>

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				<p>description for comment.</p> <p>CNSC staff are committed to ongoing consultation and engagement with Indigenous groups and organizations in relation to this proposed project and will be working collaboratively with all Indigenous groups and organizations in order to ensure that they are meaningfully involved throughout the EA and licensing processes, including developing community specific consultation plans, where appropriate . The availability of the second phase of participant funding will be announced within the next few months (around the same time as the Commission makes its decision on the scope of the EA). CNSC staff will continue to communicate with Indigenous groups and organizations in a timely manner about funding opportunities.</p> <p>CNSC staff acknowledge the importance of working with and integrating IK alongside western scientific and regulatory information in its assessments and regulatory processes, where appropriate and when authorized by Indigenous communities. Indigenous ways of knowing and cultural context enhance the CNSC's understanding of potential impacts of projects and strengthens the rigour of project reviews and regulatory oversight.</p> <p>CNSC staff have noted these comments, and have shared them with the proponent. In accordance with the CNSC's REGDOC-3.2.2, <i>Indigenous Engagement</i> and the EIS Guidelines, it is CNSC staff's expectation that proponents engage with Indigenous groups whose Indigenous and/or treaty rights may be impacted by the project and considers gathering and working with IK as part of their project design and regulatory review process. It is CNSC staff's expectation that the proponent works directly with Indigenous communities and knowledge holders on gathering, incorporating and reflecting IK in their project design, operations, reports and monitoring, where appropriate. It is also CNSC staff's expectation that the proponent review and address concerns and requests through ongoing engagement with all Identified Indigenous groups and organizations, including the AOO, during the development of the draft EIS. The proponent is to provide details within the EIS as to how specific requests, issues and concerns raised were addressed and mitigated. The proponent is to provide updates on these activities in the EIS and in future iterations of their Indigenous Engagement Report.</p> <p>It is also CNSC staff's expectation that engagement activities need to remain flexible to the group or organizations in question and that seeking input from those being engaged with will be vital to</p>
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IEC3	Indigenous Engagement and Consultation	<a href="#">Anishinabek Nation</a>	<p>The Anishinabek Nation notes that there are no effects on Indigenous peoples described in the project description, even though the three candidate sites fall within a land claim area as well as Anishinabek Nation territory and in close proximity to the AOPFN. Additional studies, consultation and accommodation will therefore be a requirement.</p>	<p>building and maintaining relationships of all parties involved.</p> <p>The common law duty to consult with Indigenous peoples applies when the Crown contemplates actions that may adversely affect potential or established Indigenous and/or treaty rights. The CNSC ensures that all of its EA and licensing decisions under CEAA 2012 and the NSCA uphold the honour of the Crown and consider Indigenous peoples' potential or established Indigenous and/or treaty rights pursuant to section 35 of the <i>Constitution Act, 1982</i>. CNSC staff have identified First Nation and Métis groups and organizations who may have an interest in the project and provided each identified group and organization with a notice of the commencement of the EA and a copy of the project description for comment.</p> <p>CNSC staff are committed to ongoing consultation and engagement with Indigenous groups and organizations in relation to this proposed project and will be working collaboratively with all Indigenous groups and organizations in order to ensure that they are meaningfully involved throughout the EA and licensing processes, including developing community specific consultation plans, where appropriate. The availability of the second phase of participant funding will be announced within the next few months (around the same time as the Commission makes its decision on the scope of the EA). CNSC staff will continue to communicate with Indigenous groups and organizations in a timely manner about funding opportunities.</p> <p>CNSC staff acknowledge the importance of working with and integrating IK alongside western scientific and regulatory information in its assessments and regulatory processes, where appropriate and when authorized by Indigenous communities. Indigenous ways of knowing and cultural context enhance the CNSC's understanding of potential impacts of projects and strengthens the rigour of project reviews and regulatory oversight.</p> <p>CNSC staff have noted these comments, and have shared them with the proponent. In accordance with the CNSC's REGDOC-3.2.2, <i>Indigenous Engagement</i> and the EIS Guidelines, it is CNSC staff's expectation that proponents engage with Indigenous groups whose Indigenous and/or treaty rights may be impacted by the project and considers gathering and working with IK as part of their project design and regulatory review process. It is CNSC staff's expectation that the proponent works directly with Indigenous communities and knowledge holders on gathering, incorporating and reflecting IK in their project design, operations, reports and monitoring, including collaborating on gathering IK</p>
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				<p>and perspectives through additional studies, where appropriate. It is also CNSC staff's expectation that the proponent review and address concerns and requests through ongoing engagement with all identified Indigenous groups and organizations, including the Anishinabek Nation, during the development of the draft EIS. The proponent is to provide details within the EIS as to how specific requests, issues and concerns raised were addressed and mitigated. The proponent is to provide updates on these activities in the EIS and in future iterations of their Indigenous Engagement Report.</p> <p>It is also CNSC staff's expectation that engagement activities need to remain flexible to the group or organization in question and that seeking input from those being engaged with will be vital to building and maintaining relationships of all parties involved.</p>
IEC4	Indigenous Engagement and Consultation	<a href="#">Métis Nation of Ontario</a> (MNO)	<p>The MNO states that the MMR project has the potential to negatively impact Métis citizens who use the traditional territory in the vicinity of the proposed location. To ensure the impacts are mitigated and where appropriate accommodated, the MNO will need to continue to be involved in this project through ongoing and active consultation.</p>	<p>The common law duty to consult with Indigenous peoples applies when the Crown contemplates actions that may adversely affect potential or established Indigenous and/or treaty rights. The CNSC ensures that all of its EA and licensing decisions under CEAA 2012 and the NSCA uphold the honour of the Crown and consider Indigenous peoples' potential or established Indigenous and/or treaty rights pursuant to section 35 of the <i>Constitution Act, 1982</i>.</p> <p>CNSC staff have identified First Nation and Métis groups and organizations who may have an interest in the project and provided each identified group and organization with a notice of the commencement of the EA and a copy of the project description for comment.</p> <p>CNSC staff are committed to ongoing consultation and engagement with Indigenous groups and organizations in relation to this proposed project and will be working collaboratively with all Indigenous groups and organizations, including the MNO in order to ensure that they are meaningfully involved throughout the EA and licensing processes, including developing community specific consultation plans, where appropriate. The availability of the second phase of participant funding will be announced within the next few months (around the same time as the Commission makes its decision on the scope of the EA). CNSC staff will continue to communicate with Indigenous groups and organizations in a timely manner about funding opportunities.</p> <p>CNSC staff acknowledge the importance of working with and integrating IK alongside western scientific and regulatory information in its assessments and regulatory processes, where appropriate and when authorized by Indigenous communities. Indigenous ways of knowing and cultural context enhance the CNSC's understanding of potential impacts of projects and</p>

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				<p>strengthens the rigour of project reviews and regulatory oversight.</p> <p>CNSC staff have noted these comments, and have shared them with the proponent. In accordance with the CNSC's REGDOC-3.2.2, <i>Indigenous Engagement</i> and the EIS Guidelines, it is CNSC staff's expectation that proponents engage with Indigenous groups whose Indigenous and/or treaty rights may be impacted by the project and considers gathering and working with IK as part of their project design and regulatory review process. It is CNSC staff's expectation that the proponent works directly with Indigenous communities and knowledge holders on gathering, incorporating and reflecting IK in their project design, operations, reports and monitoring, where appropriate. It is also CNSC staff's expectation that the proponent review and address concerns and requests through ongoing engagement with all identified Indigenous groups and organizations, including the MNO, during the development of the draft EIS. The proponent is to provide details within the EIS as to how specific requests, issues and concerns raised were addressed and mitigated. The proponent is to provide updates on these activities in the EIS and in future iterations of their Indigenous Engagement Report.</p> <p>It is also CNSC staff's expectation that engagement activities need to remain flexible to the group or organization in question and that seeking input from those being engaged with will be vital to building and maintaining relationships of all parties involved.</p>
IEC5	Indigenous Engagement and Consultation	<a href="#">Anishinabek Nation</a>	<p>The Anishinabek Nation points to section 4.1 (Project Location) of the project description where it discusses CRL's feasibility study of candidate sites within the CRL property. The feasibility study considered criteria that includes aspects of the required total footprint for the facility including archaeology sites.</p> <p>The Anishinabek Nation noted that Anishinabek communities were not properly consulted on archaeology site assessments on CNL property.</p>	<p>In accordance with the requirements and guidance of the CNSC's REGDOC-3.2.2, <i>Indigenous Engagement</i> and the EIS Guidelines, CNSC staff expect that the proponent will be engaging with Indigenous groups and organizations to identify potential concerns related to impacts on Indigenous and/or treaty rights as a result of the proposed project, including impacts to any archaeological resources identified, and working collaboratively with the identified communities on addressing these concerns, where appropriate. The proponent is required to report to the CNSC regarding their engagement activities and it is expected that further details will be provided in the EIS and in the next version of the Indigenous Engagement Report.</p> <p>As outlined in paragraph 5(1)(c) of CEAA 2012, it is required that effects of changes to the environment on Indigenous peoples, including any structure, site or thing that is of historical, archaeological, paleontological or architectural significance, be addressed in the proponent's EIS in sufficient detail.</p>
IEC6	Indigenous Engagement and Consultation	<a href="#">Métis Nation of Ontario</a> (MNO)	The MNO requests a correction to section 4.3 (Project Proximity to Reserves, Traditional Territories and Land Resources used by Indigenous Peoples) of the project	CNSC staff have noted this and shared this with the proponent. It is CNSC staff's expectation that the proponent provide this

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			<p>description which speaks to the affected Indigenous communities. While MNO is included in this section and it correctly indicates that consultation will take place with regional consultation committees, it makes the error of referring to the community council addresses as the location of the 'Métis community'. The Métis people assert rights regionally through traditional territories, and as such the community council locations within the traditional territory do not represent 'community locations' rather, they are simply office locations. As the proposed project location is within a Métis traditional territory it is not possible to calculate a distance to the traditional territory. The inclusion of the distances to the office locations infers that the project is less significant to the MNO than it is to First Nations with closer reserves. This is not the case. The MNO request that this error be corrected in the project description.</p>	<p>information in the EIS and in the next version of the Indigenous Engagement Report.</p>
PP1	Public Participation	<p><a href="#">Phyllis Kessler</a></p> <p><a href="#">Ingrid Style</a></p> <p><a href="#">Linda Murphy</a></p> <p><a href="#">Georgina Bartos</a></p> <p><a href="#">Evelyn Gigantes</a></p> <p><a href="#">Old Fort Williams Cottagers' Association</a></p> <p><a href="#">Denise Giroux</a></p> <p><a href="#">William Turner</a></p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions.</i></p> <p>The commenters raised that the public 30 day comment period, extended to 60 days, for the project description was too short for meaningful consultation and that there was insufficient time for non-experts to become familiar with complexity of the project and reactor design elements.</p>	<p>Meaningful participation during our regulatory review processes is a priority for the CNSC. As such, CNSC staff were responsive to the requests to extend the comment period to allow for better participation and in recognition of the pressures associated with consulting in the summer months. CNSC staff extended the public comment period for an additional 30 days, for a total of 60 days.</p> <p>The next formal participation opportunity for the public and Indigenous groups and organizations is to review and comment on the draft EIS and supporting documentation anticipated to commence in spring 2021. The EIS is a technical document with supporting studies and reports used to identify and assess the environmental and health effects of the project and the measures proposed to mitigate those effects.</p> <p>CNSC staff have established a project distribution list to keep those interested and that have signed up to be included in the mailing list informed of any key updates on the project. Individuals and organizations that have an interest in the EA process are encouraged to sign up for this mailing list and through this communication channel, will be provided with an early notice of process timelines and upcoming milestones, such as participant funding offerings. Updates on the project are also posted on the project page of the Public Registry (<a href="#">Reference # 80182</a>) and <a href="#">CNSC website</a>.</p>
PP2	Public Participation	<p><a href="#">Ingrid Style</a></p> <p><a href="#">Evelyn Gigantes</a></p> <p><a href="#">Chris Cavan</a></p> <p><a href="#">Old Fort Williams Cottagers' Association</a></p> <p><a href="#">Denise Giroux</a></p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>Commenters have expressed concern over the transparency of the project as well as a lack of engagement. Some commenters note concerns surrounding whether the proponent has rushed the project in order to be the first small modular reactor (SMR) chosen for the CRL site and neglected proper engagement and/or consultation. Commenters further asserted the need for a fully transparent process, which includes:</p> <ul style="list-style-type: none"> <li>documenting and posting of all communications between the CNSC and the proponent</li> </ul>	<p>CNSC staff appreciate the recommendations and comments on the need for transparency and public engagement. The CNSC is committed to an open and balanced process, and one that strengthens the quality and credibility of a project's review. Being a trusted regulator is a priority for the CNSC and we are continually looking to improve the CNSC's public participation processes.</p> <p>CNSC staff have noted these comments, and have shared them with the proponent. While CNSC staff will work to address these comments, where possible, into our participation process, it is</p>

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		<p><a href="#">Northwatch</a></p> <p><a href="#">Concerned Citizens of Renfrew County and Area (CCRCA)</a></p> <p><a href="#">Ralliement contre la pollution radioactive</a></p> <p><a href="#">Tony Reddin and Marion Copleston</a></p> <p><a href="#">William Turner</a></p>	<ul style="list-style-type: none"> <li>the scope of factors decision should be made by the full Commission and should be subject to a full public hearing that allows for interventions</li> <li>development of an Administrative Protocol between the CNSC and the proponent should be done in an open way that allows for public and Indigenous groups' review</li> <li>technical sessions should be held early in the process which would allow for the Commission and CNSC staff to question the proponent and their partners</li> <li>technical sessions that allow for public and Indigenous groups to question evidence presented by the proponent, their partners, and/or CNSC staff</li> <li>documents should be posted online to the public registry and should be searchable, downloadable, and should have a working index document with hyperlinks, that would allow for easier navigation of all project related documentation</li> <li>all documents, including the EIS, should provide references and easy access to all source documents</li> <li>an open review of the review timelines with the ability to comment</li> <li>adequate flexibility in the hearing process to allow for interventions to go beyond the typical 10 minutes allotted by the CNSC and even beyond 30 minutes as has been done with past joint CNSC-CEAA hearings</li> </ul> <p>The Old Fort Williams Cottagers' Association specifically points to section 2.3 (Description of Communications Activities) of the project description, which states that on February 15, 2019, CNL announced that the proponent's proposal had advanced to Stage 3 of the review process. That milestone, along with the submission of the Project Description, signaled the opportunity for the proponent to begin fulsome public and Indigenous engagement.</p> <p>It is the observation of the Old Fort Williams Cottagers' Association that the proponent has made no attempt to engage the public in order to educate, inform or discuss its proposal. According to the commenter the proponent missed the opportunity to engage with their community during the summer months of 2019 when cottagers are in residence.</p> <p>Evelyn Gigantes notes that if the MMR project is to deserve public acceptance there will need to be opportunities for the public to physically discuss with, and ask questions of both the proponent and expert CNSC staff, especially on matters of safety and environmental concern.</p> <p>William Turner states that there is no evidence of the proponent conducting public engagement activities, it appears that the CNSC has taken on the role of the proponent in engaging the public. Accordingly, the CNSC is not independent of the proponent, failing to discharge its role as an impartial regulator.</p> <p>William Turner states further that the proponent's lack of a public information program does not comply with the CNSC's REGDOC-3.2.1 <i>Public and Aboriginal Engagement - Public Information and Disclosure</i> and questions why is the CNSC not enforcing these requirements.</p>	<p>CNSC staff's expectation that the proponent also consider these comments in their public engagement activities.</p> <p>As outlined in section 6 (Public and Stakeholder Consultation) of the CNSC's EIS Guidelines, the proponent's EIS must describe their public participation activities in accordance with the requirements within the CNSC's <a href="#">REGDOC-3.2.1, Public Information and Disclosure</a>. In particular, the EIS Guidelines requires that the EIS:</p> <ul style="list-style-type: none"> <li>describe efforts made by the proponent to distribute project information</li> <li>indicate the methods used, where the consultation was held, the persons and organizations consulted, the concerns voiced and the extent to which this information was incorporated in the design of the project as well as in the EIS</li> <li>provide a summary of key issues raised related to the project and its potential environmental effects</li> <li>describe any outstanding issues and the ways the proponent is addressing them</li> </ul> <p>As part of the licensing process the applicant is required to develop a Public Information and Disclosure Program in accordance with REGDOC-3.2.1.</p> <p>Concerning the CNSC's regulatory review processes, public and Indigenous groups' and organizations' involvement is encouraged in regulatory matters and provides several participation opportunities including a public hearing process and a Participant Funding Program. Throughout the EA and licensing process, CNSC staff will engage with the public within the regional project area through a variety of activities tailored to each audience such as open houses, information booths at community events, webinars, technical sessions and will provide project status updates to those who have expressed an interest in the project.</p> <p>The next formal participation opportunity for the public and Indigenous groups and organizations is to review and comment on the draft EIS and supporting documentation anticipated to commence in spring 2021. The last formal participation opportunity is the review of CNSC staff's EA Report and Commission member documentation for licensing and provide written and/or oral interventions for the public hearing considering the EA and licensing recommendations. Separate participant funding opportunities will be offered for the review of the draft EIS and for the public hearing process. For further information on the opportunities for the public and Indigenous</p>
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				<p>groups and organizations to participate in the licensing process, please refer to REGDOC-3.5.1, <i>Licensing Process for Class I Nuclear Facilities and Uranium Mines and Mills</i>.</p> <p>With respect to comments on the Public Registry, the CNSC is responsible for initiating and managing a project page (<a href="#">Reference # 80182</a>) on the Canadian Impact Assessment Registry (Public Registry). The Public Registry is searchable and provides downloadable documents including notices for public and Indigenous groups' and organizations' comment periods, proponent's documents and supporting technical reports, and comments received during the EA process and Commission decision statements issued to the proponent. All documents must include references and source material as required in the EIS Guidelines. Comments related to the Public Registry have been shared with the Canadian Impact Assessment Agency, as they are responsible for establishment and maintenance of the Public Registry.</p> <p>With respect to comments on the development of an administrative protocol, an administrative protocol between CNSC and the proponent is currently under development. The purpose of this protocol is to outline the administrative framework that includes roles and responsibilities such as communications between both parties related to the regulatory review. This protocol aims to provide efficient project management for the regulatory review of information submitted by GFP in support of the project. The administrative protocol does not include review timelines. Upon finalization, the administrative protocol will be posted on the Public Registry and CNSC website for transparency.</p> <p>The comment requesting the provision of adequate flexibility in the Commission process allowing for extended oral intervention time during public hearings has been provided to the Commission Secretariat for consideration, as a review is currently underway for improvements to the Commission proceeding processes.</p>
PPO1	Purpose of the Project/ Project Objectives	<p><a href="#">Northwatch</a></p> <p><a href="#">Denise Giroux</a></p> <p><a href="#">Concerned Citizens of Renfrew County and Area (CCRCA)</a></p> <p><a href="#">David Prentice</a></p> <p><a href="#">Ralliement contre la pollution</a></p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>Commenters raise the concern that the purpose of the project and its objectives are unclear and unrealistic, and that the proponent should clarify the purpose of the designated project and the alternative means of carrying out the designated project as per paragraphs 19(1)(f) and 19(1)(g) of CEAA 2012, respectively.</p> <p>Northwatch argues that within section 3.1.2 (Overall Project Objectives), the proponent's statement that the project "will demonstrate the commercial viability of</p>	<p>CNSC staff have noted these comments and shared them with the proponent. CNSC staff expect the proponent to take into consideration these comments to ensure that the purpose of the project and its objectives are clearly outlined and supported in the EIS.</p> <p><b>Completeness of the project description</b> CEAA 2012 requires that the proponent of a designated project, except projects that are regulated by the CNSC or the National Energy Board, submit a project description to the Canadian Environmental Assessment Agency (the Agency). The <i>Prescribed</i></p>

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		<p><a href="#">radioactive</a></p>	<p>the MMR technology to prospective customers (e.g., remote communities and mining industry) with no access to grid power for their heating and electricity needs,” is generic, unreferenced, unsupported and unrealistic. This is in relation to very different conditions of a “pilot” project in the midst of the CNL managed property versus a real-life remote industrial setting.</p> <p>Similarly, the “Ralliement contre la pollution radioactive” debates that the only objective of the project is to verify if the proposed new technology can produce heat and electricity in a reliable and safe way. However, nowhere in the project description is the project defined as a demonstration or research project. In fact, the word “prototype” is never used. The “Ralliement contre la pollution radioactive” make the following requests:</p> <ul style="list-style-type: none"> <li>• that the proponent outline all the questions that they are looking to answer through the proposed project, as well as the criteria they will use to judge the results</li> <li>• that the proponent clearly explain what is Canada’s interest in testing this prototype</li> <li>• that the proponent explain why the project description does not mention CNL’s summary report entitled <i>Perspectives on Canada’s SMR Opportunity</i> or the 2016 study conducted by the Ontario Ministry of Energy called <i>Feasibility of the Potential deployment of Small Modular Reactors</i></li> <li>• that the CNSC clarify why it has accepted to present a project in such a biased manner, without recognizing its true purpose</li> </ul> <p>Denise Giroux questions the purpose of the project to power CRL when it has been operating for decades without one. Denise Giroux suggests that the nuclear industry is the sole beneficiary of the MMR project.</p> <p>The CCRCA raise that the proponent’s project objective to “demonstrate the commercial viability of the MMR technology to prospective customers,” is not a physical activity under CEAA 2012.</p> <p>The CCRCA specifically request clarity and certainty on the purpose of the project as the proponent only suggests in section 3.1.2 (Overall Project Objectives) that “heat could satisfy the needs of the Chalk River Laboratories,” and that “electrical power could also be supplied to the local power grid.” If this is the case, the proponent should be required to take into account alternative means of carrying out the designated project to address paragraph 19(1)(g) of the <i>Canadian Environmental Assessment Act, 2012</i>.</p>	<p><i>Information for the Description of a Designated Project Regulations (SOR/2012-148)</i> set out the information that must be included in a project description. The Agency then uses the information in the project description during a ‘screening’ phase to inform a decision on whether an EA of the designated project is required.</p> <p>Although not required for designated projects regulated by CNSC, the CNSC has adopted, within its EA process, the requirement to submit a project description, as outlined in appendix A of REGDOC-2.9.1: <i>Environmental Protection: Environmental Principles, Assessments and Protection Measures</i>. The purpose of the project description is for CNSC staff to determine if a project proposal meets the definition of “designated project” such that CEAA 2012 would apply. To this end, proponents are referred to the <i>Prescribed Information for the Description of a Designated Project Regulations (SOR/2012-148)</i> for the information that should be submitted within their project description</p> <p>CNSC staff reviewed the proponent’s project description against the regulatory requirements, and determined that sufficient information was provided to:</p> <ul style="list-style-type: none"> <li>• meet the <i>Prescribed Information for the Description of a Designated Project Regulations (SOR/2012-148)</i> such that the project description is deemed complete and need not be revised</li> <li>• make a determination on the applicability of CEAA 2012</li> </ul> <p><b>Purpose of the project and alternative means of carrying out the project</b></p> <p>As outlined in subsection 4.1 (Purpose of the project) of the EIS Guidelines, the proponent’s EIS will have to document in sufficient detail the justification and rationale for the project. If the objectives of the project are related to broader private or public sector policies, plans or programs, this information should also be included.</p> <p>Under the Agency’s operational policy statement, <a href="#">Addressing “Purpose of” and “Alternative Means” under CEAA 2012</a>, for a project’s purpose and objectives a physical activity is not a requirement to be considered. The project purpose is to convey what the proponent intends to achieve by carrying out the designated project.</p> <p>Alternative means of carrying out the designated project must be included in the EIS in accordance with paragraph 19(1)(g) of CEAA 2012. As outlined in subsection section 4.3 (Alternative means for</p>
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Disposition Table of Public and Indigenous Groups' and Organizations' Comments on the Project Description– Micro Modular Reactor Project

				<p>carrying out the project) of the EIS Guidelines, it is CNSC staff's expectation that the proponent will use the information in appendix A, section A.3.2, Alternative means for carrying out the project, of the CNSC's <a href="#">REGDOC-2.9.1, Environmental Protection: Environmental Policy, Assessments and Protection Measures</a>. The alternative means must be technically and economically feasible and include environmental effects of any such alternative means. In addition, CNSC staff require that information in the EIS and licensing submissions be provided in sufficient detail and/or with relevant references to substantiate any statements made. Sufficient information is required for CNSC staff to make scientifically defensible recommendations to inform evidence-based Commission decisions.</p> <p>Members of the public and Indigenous groups and organizations will be provided the opportunity to review and comment on the draft EIS and supporting documentation during the EA process – a public comment period is anticipated Spring 2021 – and through future CNSC public engagement activities. Future public participation opportunities also include the review of CNSC staff's EA Report and Commission member documentation for the Licence to Prepare Site, as well as participation in the EA and licensing public hearings. For further information on the opportunities for the public and Indigenous groups and organizations to participate in the licensing process, please refer to REGDOC-3.5.1, <i>Licensing Process for Class I Nuclear Facilities and Uranium Mines and Mills</i>.</p>
RR1	CNSC's Roles and Responsibilities	<p><a href="#">Canadian Environmental Law Association</a> (CELA)</p> <p><a href="#">Environment North</a></p> <p><a href="#">Northwatch</a></p> <p><a href="#">Brad Blaney</a></p> <p><a href="#">William Turner</a></p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>The commenters argue that the CNSC should not be conducting this EA and licence application due to a lack of independence and expertise.</p> <p>Northwatch specifically requests that the project be referred to an independent review panel for the conduct of the EA, with at least two panel members appointed by the federal Minister of the Environment and at least one panel member appointed by the Algonquin Nation.</p>	<p>The Commission, the CNSC's independent decision-making body is an administrative tribunal set up at arm's length from government, with no ties to the nuclear industry. The Commission makes its decisions transparently, taking into consideration evidence-based information and provides extensive reasons for those decisions.</p> <p>In response to <a href="#">Environmental Petition 413</a>, the former Minister of Natural Resources Canada, Jim Carr, indicated that: "The Government of Canada places the highest priority on public safety and security and environmental protection in all nuclear activities in Canada. The Government of Canada is confident that the CNSC has the necessary capacity and expertise to review and make science-based decisions on proposed projects. The CNSC is well recognized by the international nuclear community and is subject to regular international peer review."</p> <p>Notwithstanding this, the concerns and interests of Indigenous groups and organizations, members of the public and stakeholders are of vital importance to the CNSC, who will ensure an open and</p>

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				<p>balanced process, and one that strengthens the quality and credibility of a project's review. Being a trusted regulator is a priority for the CNSC. CNSC staff will continue our efforts to build relationships with Indigenous groups and organizations, civil society associations and the public to strengthen confidence and trust in the CNSC, and its independence.</p> <p>In making an EA decision, the Commission will take into consideration the proponent's EIS, CNSC staff's EA Report and supporting documentation, as well as public comments and Indigenous peoples', to determine if the project is likely to cause significant adverse environmental effects, taking into consideration the implementation of mitigation measures. The Commission will require sufficient information to make a science-based EA decision.</p> <p>If there is a positive EA decision (i.e., project is not likely to cause significant adverse environmental effects, taking into consideration the implementation of mitigation measures), the Commission can then proceed with the licensing decision under the NSCA. In making its licensing decision, the Commission will determine whether the applicant is qualified and will make adequate provision for the protection of the environment, the health and safety of persons.</p> <p>Regarding the request for an independent review panel for the conduct of the EA, in accordance with subsection 38(6) of CEEA 2012, there is no option for CNSC-led projects to be referred to an EA by a review panel.</p>
<p align="center">PD1</p>	<p align="center">Project Description Deficiencies</p>	<p align="center"> <a href="#">Anishinabek Nation</a>  <a href="#">David Winfield</a>  <a href="#">Canadian Coalition for Nuclear Responsibility (CCNR)</a>  <a href="#">Janet Graham</a>  <a href="#">Bonnechere River Watershed Project</a>  <a href="#">Canadian Environmental Law Association (CELA)</a>  <a href="#">Larry Wiwchar</a>  <a href="#">M. A. Ramana, University of British Columbia</a> </p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>Numerous commenters indicate that the proponent has not met the prescribed information requirements for a project description as per the CEEA 2012 regulations. The commenters note a lack of information in the following areas:</p> <ul style="list-style-type: none"> <li>• references or technical data in support of statements and claims, including those about the project, the technologies to be employed and the inherent safety of its proposed fuel</li> <li>• proponent's expertise, including with respect to small nuclear reactors</li> <li>• project need, purpose and objectives</li> <li>• public and Indigenous engagement</li> <li>• detailed description of the site, including barriers to safe operation</li> <li>• descriptions of the physical works relating to the project</li> <li>• facility design (including citadel building design)</li> <li>• reactor design and technology (for example, a detailed description of the main reactor components; a history of performance and potential problems)</li> </ul>	<p>With respect to the <b>completeness of the project description</b>, please refer to CNSC staff's response to PPO1 above. With respect to <b>socio-economic considerations</b>, please refer to CNSC staff's response to PI5 below.</p> <p>With respect to the requested information in the areas identified by the commenters, a proponent is not required to submit a detailed licence application at the outset of the EA process, nor is expected to have completed its detailed technical studies. Under REGDOC-1.1.1.1, <i>Site Evaluation and Site Preparation for New Reactor Facilities</i>, Appendix A.1, an applicant is permitted to submit a subset of information to initiate the EA and licensing process.</p> <p>The proponent is required to provide information on these elements in their EIS, to determine the project's environmental effects through the lifespan of the project. As outlined in the EIS Guidelines, it is CNSC staff's expectation that the proponent consider input from the public and potentially affected Indigenous</p>

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		<p><a href="#">Northwatch</a></p> <p><a href="#">Phyllis Kessler</a></p> <p><a href="#">Sunil Nijhawan</a></p> <p><a href="#">William Turner</a></p> <p><a href="#">National Council of Women of Canada</a></p> <p><a href="#">Anne Lindsey</a></p>	<p>associated with existing high-temperature gas-cooled reactors worldwide; a discussion or references to support the claims that nuclear reactors of this or similar design have operated safely, efficiently, effectively and economically; an analysis of strengths and weaknesses of this design in comparison to other potential designs)</p> <ul style="list-style-type: none"> <li>• international standards to be met</li> <li>• fuel type, design and fabrication</li> <li>• source of enriched uranium, level of enrichment, and the proliferation and terrorism risks associated with the project</li> <li>• potential environmental and socio-economic impacts, including those on terrestrial species at risk, and their consideration over the short, intermediate and very long term for the entire project lifecycle</li> <li>• waste/sewage sources</li> <li>• accident scenarios, including responses to radiological and malfunctions</li> <li>• floodplains mapping and emergency planning for floods</li> <li>• waste characterization and waste management (including the consideration of new sources of waste and intergenerational risk)</li> <li>• decommissioning</li> <li>• financial support provided by federal authorities</li> <li>• agreement between AECL and the proponent</li> </ul> <p>The commenters note that the project description's treatment of key topics, such as radioactive waste and its management in the long term, is superficial, vague, ambiguous and unsupported.</p>	<p>groups and organizations on the EIS. In addition, as part of the CNSC's EA process, Members of the public and Indigenous groups and organizations will have the opportunity to comment on the draft EIS. CNSC staff encourage commenters to participate in all steps of the regulatory review process, including providing comments on the draft EIS.</p> <p>Each stage of licensing for new Class I facilities have distinct regulatory requirements. The Licence to Prepare Site stage requires the applicant to demonstrate the site is suitable for the proposed facility over its lifecycle and that they will have appropriate safety and control measures in place for their proposed physical activities under that licence. In order to make the licensing conclusion on whether the site is suitable, the applicant must provide sufficient credible design information to bound the evaluation of environmental effects. Criteria outlining the appropriate level of design detail for an application for a Licence to Prepare Site are found in REGDOC-1.1.1, <i>Site Evaluation and Site Preparation for New Reactor Facilities</i>, appendix section F.1.3. The predicted environmental effects and other factors are identified within the EA and confirmed at the time of assessing the application for a Licence to Construct and throughout the facility's lifecycle. For further information on the licensing stages and the opportunities for the public and Indigenous groups and organizations to participate in the licensing process, please refer to REGDOC-3.5.1, <i>Licensing Process for Class I Nuclear Facilities and Uranium Mines and Mills</i>.</p> <p>With respect to comments on <b>financial support and agreements</b>, details of funding sources and commercial arrangements, such as those between GFP and AECL are not within the CNSC's mandate, with the exception that CNSC requires they provide evidence that the applicant is the owner of the site or has authority from the owner of the site to carry on the activity to be licensed as required under Section 3(c) of the <i>Class I Nuclear Facilities Regulations</i>. The licence application will not be deemed complete until this information has been provided.</p> <p>With respect to comments on meeting international standards, the applicant, as part of their licence application, is expected to identify and justify the codes and standards that they will be using for the project. Detailed information on this subject is expected to be submitted as part of the Licence to Construct application.</p>
<p align="center">PD2</p>	<p align="center">Project Description Deficiencies</p>	<p><a href="#">Canadian Coalition for Nuclear Responsibility</a> (CCNR)</p> <p><a href="#">Concerned Citizens of Renfrew</a></p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p>	<p>With respect to the <b>completeness of the project description</b>, please refer to CNSC staff's response to PPO1 above.</p> <p>In addition, as part of the public notice on <a href="#">July 15<sup>th</sup>, 2019</a>, CNSC</p>

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		<p><a href="#">County and Area (CCRCA)</a></p> <p><a href="#">David Prentice</a></p> <p><a href="#">Sunil Nijhawan</a></p> <p><a href="#">Northwatch</a></p> <p><a href="#">William Turner</a></p>	<p>The commenters argue that the CNSC should require the proponent to address information deficiencies in a revised project description. Northwatch specifically asks the CNSC to allow for a second comment period of minimum 60 days to review the revised and resubmitted project description.</p> <p>The CCRCA also believes that the CNSC should review and clarify its procedures for making the determination that a project description has been written in accordance with the <i>Prescribed Information for the Description of a Designated Project Regulations</i> (CEAA 2012), and should inform the Commission and the public about them.</p> <p>The CCNR suggests that the project description be along the lines of CNSC's regulatory document entitled "Construction Licence Application for Nuclear Power Plants: Guidelines" (June 2009). Similarly, Sunil Nijhawan and William Turner believe that "the proponent fails to meet the very basic norms of a nuclear reactor licensing application at any stage of the application process" because of the absence of CEAA or CNSC requirements on the content of the project description.</p>	<p>staff communicated to the public that it had "reviewed the project description and determined that it was written in accordance with the <i>Prescribed Information for the Description of a Designated Project Regulations</i> (CEAA 2012)". Through staff's CMD, CMD 20-H102, on the scope of factors for the EA on the MMR project the Commission will be informed of staff's acceptance of GFP's project description.</p> <p>CNSC staff notes that each stage of licensing for new Class I facilities has distinct regulatory requirements and levels of information commensurate to the activities to be licensed. For further information on the licensing stages and the opportunities for the public and Indigenous groups and organizations to participate in the licensing process, please refer to REGDOC-3.5.1, <i>Licensing Process for Class I Nuclear Facilities and Uranium Mines and Mills</i>.</p> <p>Information submitted by an applicant for consideration under a Licence to Construct application will be assessed by CNSC according to the requirements and guidance of REGDOC-1.1.2, <i>Licence Application Guide: Licence to Construct a Nuclear Power Plant</i> and the other applicable documents in the CNSC's regulatory framework.</p>
LO1	Land Ownership	<p><a href="#">Northwatch</a></p> <p><a href="#">William Turner</a></p> <p><a href="#">David Winfield</a></p>	<p>Northwatch requests clarity for inconsistencies with the project description where the Chalk River Laboratories property is described as being owned by Atomic Energy of Canada Limited (AECL) (for example, on p.6 and 34), whereas Appendix B clearly identifies AECL as the "custodian" rather than the owner and states the property is "crown owned."</p> <p>William Turner and David Winfield questions how can the project proceed when AECL, owner of the Chalk River site has yet to approve the use of that land to site this or any other reactor.</p>	<p>CNSC staff have noted these comments and have shared them with the proponent. It is CNSC staff's expectation that the proponent clarify AECL's role in the draft EIS.</p> <p><a href="#">Appendix B</a> of GFP's Licence to Prepare Site application provides information regarding a potential land agreement between AECL and the proponent and authorization of use of land to conduct the licensed activity; this context is further expanded on by AECL, CNL and the GFP websites. Section 3 (c) of the <i>Class I Nuclear Facilities Regulations</i> requires the applicant to provide evidence that they are the owner of the site or has the authority from the owner of the site to carry on the activity to be licensed. The licence application will not be deemed complete until this information has been provided.</p> <p>The project cannot commence any physical activities until a positive EA decision and a Licence to Prepare Site has been issued by the Commission.</p>
PS1	Project Schedule	<p><a href="#">Anishinabek Nation</a></p> <p><a href="#">William Turner</a></p>	<p>The Anishinabek Nation notes that section 3.4 (Project Phases and Schedule) of the project description indicates that plant operation will occur from 2023 to 2054, a total of 31 years, while in the rest of the document, plant operation is described as lasting 20 years. The Anishinabek Nation requests that this discrepancy be clarified.</p> <p>William Turner notes in the same section of the proponent's preliminary schedule there</p>	<p>Section 3.4 (Project Phases and Schedule) of the project description indicates that the dates within that section "are bounding start and end dates for each of the project phases, based on estimated early and late start and finish dates for specific phase activities." It then makes reference to the expected durations of the activities being found in section 3.5. Section 3.5.3</p>

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			<p>are discrepancies such as the potential operation of the plant to begin in 2023, four years before the construction is complete and the commencement of decommissioning ten years before the plant ceases operation. This demonstrates serious unresolved uncertainties.</p>	<p>(Plant Operation) then clarifies that: “The Operation phase activities will take approximately 20 years, once the reactor has been constructed and commissioned.”</p> <p>Given the bounding approach of section 3.4 provides a range of potential dates, commencement of project activities will depend on the timing and completion of the preceding activities. Irrespective of the proposed schedule, no activities that require authorization can take place prior to issuance of a licence by the Commission.</p> <p>As outlined in section 4.3 (Scope of project) of the EIS Guidelines, CNSC staff require the proponent to describe all phases of the project and their associated activities in the EIS. Further details on the schedule for all phases of the project is required to be provided in the EIS.</p>
PCF1	Project Costs and Funding	<p><a href="#">Algonquins of Pikwakanagan First Nation</a> (AOPFN)</p> <p><a href="#">Anishinabek Nation</a></p> <p><a href="#">Arthur Beaubien</a></p> <p><a href="#">Bonnechere River Watershed Project</a></p> <p><a href="#">Concerned Citizens of Renfrew County and Area</a> (CCRCA)</p> <p><a href="#">David Prentice</a></p> <p><a href="#">Georgina Bartos</a></p> <p><a href="#">Glenn Black</a></p> <p><a href="#">Linda Murphy</a></p> <p><a href="#">Maritime Aboriginal Peoples Council</a></p> <p><a href="#">National Council of Women of Canada</a></p> <p><a href="#">Northwatch</a></p> <p><a href="#">Pontiac Environment Protection</a></p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>The commenters argue that the project description lacks information on project economics, including details to respond to the following questions:</p> <ul style="list-style-type: none"> <li>• Is there a market for this technology?</li> <li>• Is this project economically feasible?</li> <li>• How can there be enough money to build, decommission and deal with nuclear waste?</li> <li>• Have the full and true costs of the project been properly assessed, including reactor maintenance, safe disposal of the highly radioactive spent fuel, and decommissioning? Will the public be on the hook for hidden costs over the lifespan of the project?</li> <li>• For liability purposes, will the proponent have a private insurance, paid in advance, with cradle to grave coverage that fully covers potential nuclear accidents?</li> <li>• Will this project be funded using taxpayers money? Will it depend on large tax subsidies?</li> <li>• Will the proponent pay rent for using land or is it being offered for free by CNL?</li> <li>• What is the financial support provided by CNL? Is the proponent soliciting any funds from CNL (now or in the future)?</li> <li>• What is the financial support provided by federal authorities (AECL or others)?</li> <li>• What are the trade implications of dealing with foreign companies?</li> </ul> <p>Section 5 (Federal Involvement) of the project description states: “Federal authorities are not providing financial support to the project.” Many commenters argue that this statement is untrue, and that the proponent fails to acknowledge that federal authorities are, or may be, providing financial support.</p>	<p>Market potential, economic feasibility and sources of company funding (with the exception of financial guarantees) are not within the mandate of the CNSC. With respect to <b>financial support and arrangements</b>, please refer to CNSC staff’s response to PD1 above.</p> <p><b>Financial guarantees</b> The CNSC has the authority under the NSCA and related regulations (paragraph 3(1)(1) of the <i>General Nuclear Safety and Control Regulations</i>) to require financial guarantees to cover eventual decommissioning costs of a facility, or, to mitigate business continuity conditions if the ownership model puts the licensee at risk of being inadequately funded by the owners (due to, for example, business failure).</p> <p>GFP, as the applicant, is the sole organization carrying the responsibilities and liabilities. As such, GFP will be required to develop, implement and maintain a radioactive waste management program which will be reviewed and assessed by CNSC staff against regulatory requirements. In addition, GFP is required to develop and maintain a decommissioning plan and to provide a financial guarantee sufficient to carry out all decommissioning activities, including the long term management of all of its radioactive waste, in the event that they are unable to carry out these activities. Both the decommissioning plan and the associate financial guarantee are also subject to CNSC review against regulatory requirements. Financial guarantees are required in accordance with the scope of the licensed activities as outlined in section 4.14.4 (Financial guarantees) of REGDOC-1.1.1, <i>Site Evaluation and Site Preparation for New Reactor Facilities</i>, and other applicable regulatory documents. The value of the</p>

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		<p><a href="#">Ralliement contre la pollution radioactive</a></p> <p><a href="#">Richard Tomkins</a></p> <p><a href="#">Tony Reddin and Marion Copleston</a></p> <p><a href="#">Joanne Murray</a></p> <p><a href="#">Valerie Needham</a></p> <p><a href="#">Phyllis Kessler</a></p>	<p>Northwatch notes that the project description makes several statements about the support of CNL (which is funded through a federal contract) and AECL (which is a federally funded crown corporation), all contradicting the above-mentioned statement. Northwatch mentions that this is only part of a larger deficiency with the project description, which is the absence of a clear description of the roles, responsibilities, authorizations and obligations of the various partners, namely the proponent, CNL, AECL, and OPG. Northwatch specifically requests that, before the EIS is prepared, there be a determination as to which of the partners share the responsibilities and liabilities of the project proponent (or how will the proponent be required to demonstrate that they have the capabilities to proceed as project proponent) and that the financial arrangements between partners be disclosed.</p> <p>Similarly, the AOPFN requests the CNSC and/or the proponent to provide confirmation of who will be partnering in the project (i.e. USNC, OPG, AECL or CNL), including any commitments for financing (federal funding or otherwise) and whether there is any risk of the project not proceeding if these partnerships do not go forward. <b>[Request 4]</b></p> <p>On page 8, the project description states that “[t]he proposed project is the first commercial deployment of a private sector funded SMR technology in Canada.” Northwatch argues that no evidence of private sector funding is presented, and that in fact, AECL and OPG are both crown corporations (and so publicly funded), CNL is fully funded by the federal government through contracts, and the proponent may be funded by OPG, hence may also be publicly funded.</p> <p>On this same topic, the CCRCA note that the Government of Canada, through AECL, has provided an investment of \$1.2 billion over ten years, beginning in 2016, to transform the Chalk River Laboratories site into a “modern, world-class nuclear science and technology campus.” The CCRCA argue that most or all of this funding is being transferred to CNL, the privately-owned company that manages the CRL site. The CCRCA also claim that the 2019-2020 federal budget alone provides AECL with \$461 million for operating and capital expenses related to its nuclear laboratories, all or nearly all of which is transferred to CNL.</p>	<p>financial guarantee will correspond to the extent of the decommissioning that is required to reach the predetermined end state objectives and will vary through the various phases of the project.</p> <p>Should a licence be issued, the licensee will have to acquire appropriate nuclear liability coverage for the project consistent with the applicable requirements of the <i>Nuclear Liability and Compensation Act</i>.</p> <p><b>Description of roles and responsibilities</b> A “description of the roles, responsibilities, authorizations and obligations of the various partners” is not a requirement for a project description. Issuance of a licence by the Commission relies on a demonstration that an applicant is qualified to carry on the licensed activity, and has/will be implementing adequate measures for the protection of people, the environment and the maintenance of national security. As such, roles, responsibilities and any arrangements that support the applicant in meeting the CNSC’s requirements to demonstrate that they are qualified, will be considered as part of the staff’s review within the licensing process.</p> <p>AOPFN’s request has been noted by CNSC staff and shared with the proponent. In accordance with the CNSC’s REGDOC-3.2.2, <i>Indigenous Engagement</i> and the EIS Guidelines, it is CNSC staff’s expectation that the proponent review and address concerns and requests through ongoing engagement with all identified Indigenous groups and organizations, including the AOPFN, during the regulatory review process, including the development of the draft EIS.</p>
<p align="center">NP1</p>	<p align="center">Fuel Fabrication and Nuclear Non-Proliferation</p>	<p><a href="#">Anishinabek Nation</a></p> <p><a href="#">Anne Lindsey</a></p> <p><a href="#">Arthur Beaubien</a></p> <p><a href="#">Maritime Aboriginal Peoples Council</a></p> <p><a href="#">Concerned Citizens of Renfrew County and Area (CCRCA)</a></p> <p><a href="#">David Prentice</a></p> <p><a href="#">Evelyn Gigantes</a></p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>The commenters raise concerns about the use of enriched uranium as a fuel source, and its associated risks in terms of:</p> <ul style="list-style-type: none"> <li>• nuclear proliferation (including nuclear weapons), especially given the high enrichment level proposed (9-12%)</li> <li>• security measures against terrorism and sabotage, and how to deal with higher risks if SMRs are increasingly used and deployed at diverse locations</li> <li>• fuel transportation from the United States to Canada</li> <li>• long-term disposal</li> </ul> <p>More specifically, the commenters pose the following questions:</p> <ul style="list-style-type: none"> <li>• What will be the composition of the fuel?</li> </ul>	<p>Future SMR projects (e.g., northern Canada) are not within the scope of this EA and application for a Licence to Prepare Site.</p> <p>CNSC staff understand the level of concern on fuel fabrication and nuclear non-proliferation. The proponent is required to provide information on these elements in their EIS, to determine the project’s environmental effects through the lifespan of the project. As outlined in the EIS Guidelines, it is CNSC staff’s expectation that the proponent consider input from the public and potentially affected Indigenous groups and organizations on the EIS. In addition, as part of the CNSC’s EA process, members of the public and Indigenous groups and organizations will have the opportunity to comment on the draft EIS. CNSC staff encourage commenters to participate in all steps of the regulatory review process, including providing comments on the draft EIS.</p>

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		<p><a href="#">William Turner</a></p> <p><a href="#">Glenn Black</a></p> <p><a href="#">Jeff Brackett</a></p> <p><a href="#">Kenneth Birkett</a></p> <p><a href="#">Linda Murphy</a></p> <p><a href="#">National Council of Women of Canada</a></p> <p><a href="#">Old Fort Williams Cottagers' Association</a></p> <p><a href="#">Pontiac Environment Protection</a></p> <p><a href="#">Ralliement contre la pollution radioactive</a></p> <p><a href="#">Richard Tomkins</a></p> <p><a href="#">Saskatchewan Environmental Society</a></p> <p><a href="#">Tony Reddin and Marion Copleston</a></p> <p><a href="#">Valerie Needham</a></p> <p><a href="#">Joanne Murray</a></p>	<ul style="list-style-type: none"> <li>• What will be the degree of enrichment of the fuel and why is it not stated in the project description?</li> <li>• Which quality control mechanisms will be put in place for fuel fabrication?</li> <li>• Where will the enriched uranium be produced? In the United States? If so, how does this impact Canada's non-proliferation agreements and the risk of weapons proliferation?</li> <li>• How will the enriched uranium be transported on site?</li> <li>• What are the proposed transportation routes?</li> <li>• Will security be increased at CRL as the threat of sabotage or dirty bombs increases?</li> <li>• If MMRs are deployed across northern Canada, how will communities be protected from sabotage or terrorist infiltration? Have these security costs been factored into the cost or will the public be saddled with this expense?</li> <li>• Will the enriched uranium need to be repatriated to the United States?</li> <li>• How will the enriched uranium be stored safely if not returned to the United States?</li> </ul> <p>Anne Lindsey describes the non-proliferation concerns associated with offsite fuel fabrication and enrichment as critically important and perceives its potential international implications as far exceeding the expertise and mandate of the CNSC.</p> <p>The CCRCA, as well as Tony Reddin and Marion Copleston, request that a description of fuel fabrication activities be part of the project description to consider it complete. The CCRCA also ask that fuel fabrication be considered in the context of the "cumulative environmental effects that are likely to result from the designated project in combination with other physical activities that have been or will be carried out" (paragraph 19(1)(a) of CEEA 2012).</p> <p>The Saskatchewan Environmental Society suggests that more information be included in the EIS with respect to the political, administrative and risk implications of importing enriched nuclear fuel into Canada and what precedent this could establish (e.g. in terms of our ability to refuse import of nuclear waste from the United States).</p>	<p>Each stage of licensing for new Class I facilities have distinct regulatory requirements. The Licence to Prepare Site stage requires the applicant to demonstrate the site is suitable for the proposed facility over its lifecycle and that they will have appropriate safety and control measures in place for their proposed physical activities under that licence. In order to make the licensing conclusion, the applicant must provide sufficient credible design information to bound the evaluation of environmental effects for a Licence to Prepare Site. Criteria outlining the appropriate level of design detail for an application for a Licence to Prepare Site are found in REGDOC-1.1.1, <i>Site Evaluation and Site Preparation for New Reactor Facilities</i>, appendix section F.1.3. The predicted environmental effects and other factors are identified within the EA and confirmed at the time of assessing the application for a Licence to Construct and throughout the facility's lifecycle. For further information on the licensing stages and the opportunities for the public and Indigenous groups and organizations to participate in the licensing process, please refer to REGDOC-3.5.1, <i>Licensing Process for Class I Nuclear Facilities and Uranium Mines and Mills</i>.</p> <p><b>Reactor design</b></p> <p>The applicant is responsible to demonstrate safety of the proposed activity, including a demonstration of design adequacy for the scope of the design that is applicable to the licence applied for. This includes submission of an acceptable safety case and supporting safety assessments, taking into account uncertainties arising for use of novel design and features. Sufficient details to bound the environmental effects and to assess site suitability are to be provided in EIS and licensing documentation. CNSC will assess the applicant's safety claims against regulatory criteria.</p> <p>The reactor design, including fuel composition will be reviewed in detail during the assessment of an application for a Licence to Construct. The reactor design must meet the CNSC's expectations as outlined in the regulatory framework. This includes REGDOC-2.5.2, <i>Design of Reactor Facilities: Nuclear Power Plants</i> or RD-367-<i>Design of Small Reactor Facilities</i>, and all supporting regulatory framework documents.</p> <p><b>Nuclear non-proliferation</b></p> <p>As outlined in subsection 9.3 (Accidents and malfunctions) of the EIS Guidelines, the proponent's EIS will have to assess all potential environmental and health effects from postulated accident and malfunction scenarios, including malevolent acts. Similarly, Appendix E and F of REGDOC-1.1.1, <i>Site Evaluation and Site</i></p>
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**Disposition Table of Public and Indigenous Groups' and Organizations' Comments on the Project Description– Micro Modular Reactor Project**

				<p><i>Preparation for New Reactor Facilities</i> provides guidance to applicants for assessing accidents, malfunctions and malevolent events for the project lifecycle as part of the application for the Licence to Prepare Site.</p> <p>It is acknowledged that SMRs may present different challenges to address non-proliferation and safeguards requirements. This will be addressed as part of CNSC's review of the detailed licensing submissions throughout the lifecycle of the facility.</p> <p>In terms of uranium enrichment, any uranium enriched to below 20% is considered to be Low Enriched Uranium (LEU), while any uranium enriched to 20% or above is considered High Enriched Uranium (HEU). HEU poses a higher proliferation risk than LEU.</p> <p>Based on the nuclear material and the type of fuel proposed for this SMR, the applicant will need to meet the requirements of the <i>Nuclear Security Regulations</i> to protect against malicious acts including theft and sabotage.</p> <p>It is the CNSC's responsibility to ensure that Canada's nuclear imports and exports are used solely for peaceful purposes and do not contribute to the development of nuclear weapons. Canada has more than 60 years of experience in the oversight of enriched uranium in reactor fuel; this includes international safeguards to provide confidence that nuclear material is not diverted and that facilities are not misused (non-proliferation), as well as the implementation of security measures to prevent acts of theft and sabotage. This experience, which includes the regulation of reactor operations and transportation of fresh and spent fuel, and spent fuel storage. This regulatory experience is directly applicable to this specific project.</p> <p>As part of Canada's commitments under the <i>treaty on the Non-Proliferation of Nuclear Weapons</i>, Canada has concluded a comprehensive safeguards agreement with the International Atomic Energy Agency (IAEA) as well as an additional protocol to that agreement. These agreements require all nuclear material and specified nuclear research, development and activities, to be declared to the IAEA. The agreements also provide the IAEA with the access and information required to verify that these declarations are correct and complete.</p> <p>In order to meet Canada's commitments to the IAEA, the CNSC's regulatory framework ensures that licence applications for new facilities provide information on the proponent's proposed measures to facilitate Canada's compliance with the safeguards</p>
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				<p>agreements (<i>Class I Nuclear Facility Regulations</i>), including the tracking of fuel inventories and the provision of access to the fuel for IAEA verification.</p> <p>Should the security threat assessment for any location where licensed activities are conducted change, the CNSC will ensure the licensee(s) take appropriate action(s).</p> <p><b>Fuel fabrication</b> Sufficient information on fuel enrichment, to determine the effects of the project on the environment, must be provided as part of the draft EIS, as outlined in section 4.3 (Scope of project) of the EIS Guidelines. In addition, specific information on the composition of the fuel will be required in support of an application for a Licence to Construct.</p> <p>At this time, the CNSC does not know where the enriched uranium will be produced. Irrespective of its origin, for all imports and exports of low enriched uranium (LEU), the applicant must meet all applicable laws and regulatory requirements, including the <i>Nuclear Non-proliferation Import and Export Control Regulations (NNIECR)</i>, the <i>Nuclear Security Regulations</i> and <i>RD-364, Joint Canada-United States Guide for Approval of Type B(U) and Fissile Material Transportation Packages</i>. Fuel manufacture is not within the scope of this project. Irrespective of the origin of fuel, the applicant will need to demonstrate adequacy of its procurement process to demonstrate quality of the procured fuel as part of the application for a Licence to Construct.</p> <p>Note that the NNIECR applies to specific radionuclides but not to radioactive waste as a whole. With respect to <b>long-term waste management</b>, please refer to CNSC staff's response to LTW1 below.</p> <p>Moreover, LEU can only be imported and exported between countries with which Canada has concluded a Nuclear Cooperation Agreement (NCA). These NCAs are legally binding, treaty level agreements negotiated by Global Affairs Canada and implemented by the CNSC. NCAs contain reciprocal obligations designed to minimize the proliferation risk associated with major nuclear transfers. Canada's NCAs do not require repatriation.</p> <p><b>Fuel transport</b> It is CNSC staff's expectation that the proponent's EIS provide sufficient information on fuel transport, to determine the project's environmental effects through the lifespan of the project. In addition, specific information on the transportation of</p>
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				<p>fuel will be required in support of an application for a Licence to Construct. Fuel is required to be transported in a package certified for the intended use. Transport of radioactive material is governed by <i>Canada's Packaging and Transport of Nuclear Substances Regulations, 2015</i>, and the <i>Transportation of Dangerous Goods Regulations</i>, which are based on and align with the International Atomic Energy Agency's <i>Regulations for the Safe Transport of Radioactive Material</i>.</p> <p>Specific transportation routes will be assessed at a later licensing stage. Note that certain details regarding the transport of fuel, including specific transportation routes, are considered classified for security purposes.</p>
DM1	Environmental Assessment Data and Methodologies	<a href="#">Algonquins of Pikwakanagan First Nation</a> (AOPFN)	<p>The AOPFN requests that the CNSC obtain the following information from the proponent:</p> <ul style="list-style-type: none"> <li>• An annotated summary of all pre-existing documentation of the CRL site and surrounding areas that may be pertinent to the baseline characterization of the proposed project. <b>[Request 14]</b></li> <li>• A preliminary workplan identifying and describing all additional baseline characterization studies to be performed in support of the project application. This workplan should describe current information gaps and the studies that will be performed to address those gaps. It should also identify the timelines required to collect sufficient information to ensure baseline conditions are adequately characterized. <b>[Request 15]</b></li> <li>• A description of all the environmental modelling that the proponent intends to perform to determine potential environmental impacts of the project (for example, atmospheric dispersion modelling, groundwater fate and transport modelling, human health and ecological risk assessments, etc.). <b>[Request 16]</b></li> <li>• A summary of previous, current and reasonably foreseeable physical works and activities that have the potential to contribute to cumulative effects when combined with the proposed project. This summary should include sub-threshold activities; in other words, a "Project Inclusion List" does not tell the full story of land and land use changes that have contributed to cumulative effects. <b>[Request 17]</b></li> </ul>	<p>As outlined in sections 8 (Description of the Environment), 9 (Effects assessment) and 10 (Mitigation) of the EIS Guidelines, the proponent's EIS will have to identify and assess all potential environmental effects, including cumulative effects, as required under CEAA 2012, of the project and propose mitigation measures to undertake, avoid or minimize any adverse environmental effects of the project. Baseline environmental studies, potential environmental effects and any cumulative environmental effects likely to result from the project in combination with other physical activities that have been or will be carried at the site must be described in sufficient detail within the EIS, in accordance with the EIS Guidelines.</p> <p>In addition, CNSC staff require that information in the EIS and licensing submissions be provided in sufficient detail and/or with relevant references to substantiate any statements made. Sufficient information is required for CNSC staff to make scientifically defensible recommendations to inform evidence-based Commission decisions.</p> <p>CNSC staff have noted the comments and requests and shared them with the proponent. In accordance with REGDOC-3.2.2, <i>Indigenous Engagement</i> and the EIS Guidelines, it is CNSC staff's expectation that the proponent engage with Indigenous groups and organizations to identify potential concerns related to impacts on Indigenous and/or treaty rights as a result of the proposed project and work collaboratively with the identified groups and organizations on addressing these concerns and requests.</p> <p>It is CNSC staff's expectation that the proponent review and address concerns and requests through ongoing engagement with all identified Indigenous groups and organizations, including AOPFN, during the development of the draft EIS. The proponent is to provide details within the draft EIS as to how specific requests,</p>

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				issues and concerns raised were addressed and mitigated. In addition, CNSC staff are committed to a meaningful consultation process with identified Indigenous groups and organizations, including AOPFN. CNSC staff will work and collaborate with AOPFN to ensure their values, priorities, interests, and concerns are meaningfully incorporated and address concerns raised throughout the EA and licensing processes. Through a meaningful consultation process, CNSC staff will to ensure that the honour of the Crown is upheld and that any potential impacts on potential or established Indigenous and/or treaty rights are appropriately addressed.
DM2	Environmental Assessment Data and Methodologies	<a href="#">Glenn Black</a>	<p>Glenn Black suggests that the following techniques, among others, be mandatory implementations by independent experts prior to the approval of the proposed project:</p> <ul style="list-style-type: none"> <li>• failure mode effects analysis</li> <li>• potential problem analysis</li> <li>• fault tree analysis</li> <li>• risk assessment</li> <li>• SCADA analysis</li> <li>• human error proofing</li> <li>• regulatory auditing</li> </ul>	<p>This comment is not within the scope of this EA and application for a Licence to Prepare Site.</p> <p>Applicants and licensees are required to submit safety analyses which are supported by methods such as those listed. The techniques and results are reviewed in detail during the assessment of the application for the Licence to Construct by CNSC staff. During the preparation of a Licence to Construct, the applicant is expected to independently verify the design's safety case, as outlined in section 5.3 of REGDOC-2.5.2, <i>Design of Reactor Facilities: Nuclear Power Plants</i>. As part of a licensing process to consider a Licence to Construct application, there are opportunities for the public and Indigenous groups and organizations to participate, including public hearings.</p>
PI1	Potential Impacts	<p><a href="#">Algonquins of Ontario (AOO)</a></p> <p><a href="#">Georgina Bartos</a></p> <p><a href="#">Northwatch</a></p> <p><a href="#">Peter Storck</a></p> <p><a href="#">Phyllis Kessler</a></p> <p><a href="#">P. Tippet</a></p> <p><a href="#">Glenn Black</a></p> <p><a href="#">Bonnechere River Watershed Project</a></p> <p><a href="#">Jeff Brackett</a></p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>The commenters note that the discussion of potential interactions between the project and the environment (section 6 of the project Description) is vague, generic, simplistic, unsupported, reliant on past construction work for other projects at CRL, and narrow in scope. The commenters ask what will the environmental and socio-economic impacts of the proposed project be. Many commenters are worried about the long-term impacts of the project on the environment and human health.</p> <p>Northwatch specifically requests that the project description include a detailed and referenced discussion of potential interactions with the environment of the proposed project under both normal operating and upset conditions, and in the decommissioning and post-decommissioning periods. For example, estimates or descriptions of the effects on the environment during the decommissioning activities should be provided to support the claim that these would be lower than during operation, including for noise, dust and radiological effects within section 6.2. (Potential Changes to the Environment by the Project) in the project description. Northwatch also points out that the proponent does not describe in any detail or provide any evidentiary support for its claim of "inherent safety characteristics" or of its "innovative novel features contribute to enhanced safety".</p>	<p>With respect to the <b>completeness of the project description</b>, please refer to CNSC staff's response to PPO1 above. With respect to <b>socio-economic considerations</b>, please refer to CNSC staff's response to PI5 below.</p> <p><b>Potential environmental and health impacts</b> CNSC staff agree that the potential long-term radiological risks to the environment and human health of the proposed project need to be considered and evaluated. This is required as part of the EA. Information and demonstration of the long-term safety of the proposed project will need to be provided by the proponent in the EIS. These predictions are confirmed at the time of assessing the application for a Licence to Construct and throughout the facility's lifecycle.</p> <p>The proponent's EIS is required to provide baseline environmental characterization and an environmental effects assessment (including describing ambient radioactivity and providing a human health risk assessment), as outlined in the EIS Guidelines and appendices A and B of REGDOC-2.9.1, <i>Environmental Protection: Environmental Principles, Assessments and Protection Measures</i>.</p>

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			<p>P. Tippet asks for a realistic effects assessment that does not rely on hopes or expectations, and proves the claims within section 6.2.4 of the project description: “[t]he environmental effects of this project are expected to be limited to the CRL site” and that “[n]o changes to the environment on Federal land in a province other than Ontario or outside Canada are expected”.</p> <p>Similarly, Glenn Black is concerned about the latency of the true risks and how, once known, it may be too late because hundreds to thousands of SMRs may already be operating and renovating them, shutting them down or choosing another viable alternative will not be possible.</p> <p>In reference to the same sentence about impacts being limited to the CRL site, the AOO highlight the lack of recognition for the complex and dynamic nature of the ecosystems within the Algonquin Settlement Area. Migratory birds, bats, fish, reptiles, groundwater, air, and other components of these ecosystems are not confined to private property lines. This interconnectedness of ecosystems is fundamental to the Algonquin worldview and identity.</p>	<p>As outlined in section 4.3 (Scope of project) of the EIS Guidelines, CNSC staff require the proponent to describe and assess in the EIS the potential environmental and health effects for all phases of the project and their associated activities, including clear descriptions of the project activities and project-environment interactions. The EIS will also have to propose mitigation measures to undertake to avoid or minimize any adverse environmental effects.</p> <p>In addition, CNSC staff require that information in the EIS and licensing submissions be provided in sufficient detail and/or with relevant references to substantiate any statements made. Sufficient information is required for CNSC staff to make scientifically defensible recommendations to inform evidence-based Commission decisions.</p> <p>As outlined in the EIS Guidelines, it is CNSC staff’s expectation that the proponent consider input from the public and potentially affected Indigenous groups and organizations on the EIS. In addition, as part of the CNSC’s EA process, Members of the public and Indigenous groups and organizations will have the opportunity to comment on the draft EIS. CNSC staff encourage commenters to participate in all steps of the regulatory review process, including providing comments on the draft EIS.</p> <p>In accordance with REGDOC-3.2.2, <i>Indigenous Engagement</i> and the EIS Guidelines, it is CNSC staff’s expectation that the proponent engage with Indigenous groups and organizations to identify potential concerns related to impacts on Indigenous and/or treaty rights as a result of the proposed project and work collaboratively with identified Indigenous groups and organizations, including the AOO to include IK, values and land use information as part of their EIS.</p>
PI2	Potential Impacts	<a href="#">Algonquins of Ontario</a> (AOO)	<p>The AOO note that the project description lacks in sufficient details to properly assess the potential impacts of the proposed project on the AOO’s rights and interests. A higher level of detail is required to more fully understand the project and evaluate potential impacts. At a high-level, the AOO are concerned about the following potential impacts related to the project:</p> <ul style="list-style-type: none"> <li>• contamination of soil, vegetation and harvested plants</li> <li>• surface and ground water</li> <li>• wildlife and their habitats</li> <li>• air quality and dust contamination</li> <li>• nuclear waste storage, transportation, and processing</li> <li>• impacts to traditional land and resource use</li> <li>• impacts to Aboriginal and treaty rights</li> <li>• technological malfunctions and accidents during construction, operation, and</li> </ul>	<p>With respect to <b>potential environmental and health impacts</b>, please refer to CNSC staff’s response to PI1 above.</p> <p>In accordance with REGDOC-3.2.2, <i>Indigenous Engagement</i> and the EIS Guidelines, it is CNSC staff’s expectation that proponents engage with Indigenous groups whose Indigenous and/or treaty rights may be impacted by the project and considers gathering and working with IK as part of their project design and regulatory review process. It is CNSC staff’s expectation that the proponent works directly with Indigenous communities and knowledge holders on gathering, incorporating and reflecting IK in their project design, operations, reports and monitoring, where appropriate. It is also CNSC staff’s expectation that the proponent</p>

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			decommissioning, and/or waste management	<p>also review and address concerns and requests through ongoing engagement with all identified Indigenous groups and organizations, including the AOO, during the development of the draft EIS. The proponent is to provide details within the EIS as to how specific requests, issues and concerns raised were addressed and mitigated. The proponent is to provide updates on these activities in the EIS and in future iterations of their Indigenous Engagement Report.</p> <p>In addition, CNSC staff are committed to a meaningful consultation process with identified Indigenous groups and organization, including AOO. CNSC staff will work and collaborate with AOO to ensure their values, priorities, interests, and concerns are meaningfully incorporated and address concerns raised throughout the EA and licensing processes. Through a meaningful consultation process, CNSC staff will to ensure that the honour of the Crown is upheld and that any potential impacts on potential or established Indigenous and/or treaty rights are appropriately addressed.</p> <p>CNSC staff acknowledge the importance of working with and integrating IK alongside western scientific and regulatory information in its assessments and regulatory processes, where appropriate and when authorized by Indigenous communities. Indigenous ways of knowing and cultural context enhance the CNSC's understanding of potential impacts of projects and strengthens the rigour of project reviews and regulatory oversight.</p>
PI3	Potential Impacts	<a href="#">Algonquins of Ontario (AOO)</a>	<p>In section 6.2.2 (Migratory Birds) of the project description outlines that tree clearing will be somewhat mitigated by avoiding Migratory Bird breeding season. The AOO have concerns about the habitat reconstruction and long-term effects of the proposed tree and habitat clearing. Further details and habitat restoration plans are requested. The act of tree clearing does not simply affect the contained Chalk River Laboratories site, but bird populations, land use, rights, and harvesting of the AOO community more broadly, and regionally. Are any of the migratory bird species and bat species that will be affected by the tree clearing also contained within the confirmed populations of Endangered Wildlife? The AOO request further information.</p>	<p>With respect to <b>potential environmental and health impacts</b>, please refer to CNSC staff's response to PI1 above.</p>
PI4	Potential Impacts	<a href="#">Anishinabek Nation</a>	<p>Section 3.1.1 (Project Summary and Context) of the project description states that "almost no fission products will be released out of the fuel". The Anishinabek Nation requests clarity as to what fission products will be released and what danger they may pose.</p> <p>Similarly, the Anishinabek Nation raises the concern that in section 6.2. (Potential Changes to the Environment by the Project) of the project description the amount of radiation that the local environment, the workers, and the general public will be subjected to is not characterized or quantified in any manner except to say that it is "very small".</p>	<p>With respect to <b>potential environmental and health impacts</b>, please refer to CNSC staff's responses to PI1 and PI2 above.</p>

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<p align="center">PI5</p>	<p align="center">Potential Impacts</p>	<p align="center"><a href="#">Anne Lindsey</a></p>	<p>Anne Lindsey is interested in the potential social effects of the proposed project and asks that they be assessed in more depth. For example, she asks the proponent to explain how the project will “enhance the research and skilled worker community locally...”</p>	<p>As outlined in sections 9.5 (Socio-economic environment) and 10 (Mitigation) of the EIS Guidelines, the proponent’s EIS will have to assess indirect socio-economic effects of the project and propose mitigation measures to undertake to avoid or minimize any adverse effects.</p> <p>With respect to direct, socio-economic effects (that are not as a result of a change to the environment), these considerations are not within the scope of this EA as it is not a requirement under CEAA 2012 and is not within the scope of the CNSC’s mandate.</p>
<p align="center">SW1</p>	<p align="center">Impacts on Surface Water and Aquatic Biota</p>	<p align="center"> <a href="#">Algonquins of Ontario (AOO)</a>  <a href="#">Anishinabek Nation</a>  <a href="#">Canadian Association of Physicians for the Environment</a>  <a href="#">David Prentice</a>  <a href="#">Janet Graham</a>  <a href="#">Richard Tomkins</a> </p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>Many commenters point to section 6.1.2 (Hydrology) of the project description because it identifies that all water on the site directly or indirectly empties into the Ottawa River. The commenters describe the Ottawa River as a source of drinking water for millions of Canadians, tourism, fisheries, sports and recreation, enjoyment and scenery. Given its importance, they are concerned with its proximity to high-level wastes, and the potential consequences of water contamination due to releases of radioactive material during normal operation and/or in the event of a spill or accident.</p> <p>The Canadian Association of Physicians for the Environment sees this potential consequence as “threatening the health of everyone who lives downstream and who relies on the Ottawa River as a source of drinking water.” Similarly, Janet Graham says that “[i]t is not worth it to despoil the natural environment and source of water of the majestic Ottawa River (virtually in perpetuity), merely in order to provide cheaper energy for a few short-lived commercial interests.” Furthermore, because the Ottawa River is the dominant drainage feature in the project area, the Algonquins of Ontario highlight the importance of understanding impacts should accidents or malfunctions occur.</p> <p>The commenters also ask for more information related to the following statement from section 6.2.1 (Fish, Fish Habitat and Aquatic Species) of the project description: “The project could, however, impact fish or fish habitat in nearby waterbodies due to the release of effluents.” The commenters ask the following questions:</p> <ul style="list-style-type: none"> <li>• What is the source and type of these effluents?</li> <li>• What is contained in the effluents being released?</li> <li>• What are the concentrations of the contaminants contained in the effluent produced by the MMR?</li> <li>• What are the potential impacts on the aquatic species at risk present (and described in section 6.2.3)?</li> </ul>	<p>With respect to consideration of <b>potential environmental and health impacts</b>, please refer to CNSC staff’s response to PI1 above.</p> <p><b>Accidents and malfunctions</b> As outlined in sections 9 (Effects assessment) and 10 (Mitigation) of the EIS Guidelines, the proponent’s EIS will have to identify and assess all potential environmental effects of the project, including all potential effects to the aquatic environment, and propose mitigation measures to undertake to avoid or minimize any adverse environmental effects of the project. In addition, as outlined in subsection 9.3 (Accidents and malfunctions) of the EIS Guidelines, the proponent’s EIS will have to assess all potential environmental and health effects from postulated accident and malfunction scenarios. Similarly, Appendix E and F of REGDOC 1.1.1, <i>Site Evaluation and Site Preparation for New Reactor Facilities</i> provides guidance for assessing accidents, malfunctions and malevolent events for the project lifecycle as part of the application for a Licence to Prepare Site.</p> <p>CNSC staff require that information in the EIS and licensing submissions be provided in sufficient detail and/or with relevant references to substantiate any statements made. Sufficient information is required for CNSC staff to make scientifically defensible recommendations to inform evidence-based Commission decisions.</p> <p>As outlined in the EIS Guidelines, it is CNSC staff’s expectation that the proponent consider input from the public and potentially affected Indigenous groups and organizations on the EIS. In addition, as part of the CNSC’s EA process, Members of the public and Indigenous groups and organizations will have the opportunity to comment on the draft EIS. CNSC staff encourage commenters to participate in all steps of the regulatory review process, including providing comments on the draft EIS.</p> <p>In accordance with REGDOC-3.2.2, <i>Indigenous Engagement</i> and</p>

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				EIS Guidelines, it is CNSC staff's expectation that the proponent engage with Indigenous groups and organizations to identify potential concerns related to impacts on Indigenous and/or treaty rights as a result of the proposed project and work collaboratively with Indigenous groups and organizations to include IK, values and land use information as part of their EIS.
HH1	Impacts on Human Health	<a href="#">Canadian Association of Physicians for the Environment</a>	<p>The Canadian Association of Physicians for the Environment notes that nowhere in the document is the word "health" mentioned and that radioactivity is dangerous to the health of every living thing at any dose. Even small exposures can cause cancer and other serious and fatal diseases. The effects are cumulative, making it particularly dangerous for children.</p> <p>The Canadian Association of Physicians for the Environment also notes that all nuclear reactors add to local radioactive contamination due to their ongoing leaks and spills, and in the event of a major accident, this contamination can be widespread, affecting people far away. The health risks of radioactive exposure to local residents, as well as people living far downstream of the Ottawa River, should at least be addressed in this document.</p>	With respect to consideration of <b>potential environmental and health impacts</b> , please refer to CNSC staff's response to PI1 above.
IE1	Import and Export of Nuclear Material	<a href="#">Anishinabek Nation</a> <a href="#">Northwatch</a>	<p>Section 1 (Introduction) of the project descriptions states: "... the MMR technology will have the potential to provide Canada with economic benefits related to developing a domestic supply chain as well as export opportunities". Northwatch argues that the project description provides no support for this claim, and in fact, clearly states that the supplier is based in the United States. Also in relation to this segment of the project description, the Anishinabek Nation poses the following question: What regulations govern the export of nuclear products to other countries and the import of nuclear products into Canada?</p>	<p>With respect to <b>socio-economic considerations</b>, please refer to CNSC staff's response to PI5 above. With respect to the <b>import and export of fuel</b>, please refer to NP1.</p> <p>The regulations governing the import and export of nuclear items, including controlled nuclear substances, equipment and technology, are the <i>Nuclear Non-proliferation Import and Export Control Regulations</i>. Additionally, Section 26 of the NSCA requires that all imports and exports of nuclear substances, prescribed equipment and prescribed information are made under a valid CNSC licence.</p>
WMG1	Waste Generation and Management	<a href="#">Diana Gillam</a> <a href="#">Linda Murphy</a> <a href="#">Georgina Bartos</a> <a href="#">Joanne Murray</a> <a href="#">Valerie Needham</a> <a href="#">Northwatch</a> <a href="#">Anne Lindsey</a> <a href="#">Old Fort Williams Cottagers' Association</a>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>The commenters note the sections that discuss waste are vague and inadequate. These sections include: 3.3.2.5 (Waste Handling and Storage Area), 3.6 (Waste Generation) and 3.5.4 (Decommissioning) of the project description.</p> <p>Considerable more information is being asked on:</p> <ul style="list-style-type: none"> <li>Quantities and characteristics of the radioactive waste that will be produced in the reactor's operation.</li> <li>How will waste be managed, stored and transported?</li> <li>What will be emitted from the 30 foot stack attached to the reactor building?</li> <li>Safety concerns on waste storage and radiation.</li> <li>Novel SMRs are likely to entail high and uncertain decommissioning costs, and does not explain how these costs would be estimated, in accordance with federal government's <i>Radioactive Waste Policy Framework</i>.</li> <li>Costs and activities associated with decommissioning and waste management</li> </ul>	<p>The proponent is required to provide information on these elements in their EIS and licence application submissions in accordance with the EIS Guidelines and REGDOC-1.1.1, <i>Site Evaluation and Site Preparation for New Reactor Facilities</i>, and other applicable regulatory documents.</p> <p><b>Waste characterization and management</b> As outlined in section 9 (Effects assessment) of the EIS Guidelines, the EIS is required to contain sufficient information regarding waste to bound the potential environmental effects.</p> <p>For the Licence to Prepare Site, the applicant will have to ensure adequate protection of any potential contamination of the land on which the project is to be built, for both radioactive and conventional waste based on historical land use. Full characterization, estimates and management of low, intermediate and high-level waste are addressed as part of the assessment of an application for a Licence to Construct (characterization process</p>

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		<p><a href="#">National Council of Women of Canada</a></p> <p><a href="#">Denise Giroux</a></p> <p><a href="#">Concerned Citizens of Renfrew County and Area (CCRCA)</a></p> <p><a href="#">Tony Reddin and Marion Copleston</a></p> <p><a href="#">Algonquins of Ontario (AOO)</a></p> <p><a href="#">Kerrie Keith</a></p> <p><a href="#">Ralliement contre la pollution radioactive</a></p>	<p>will make it impossible for the CNSC to assess the adequacy of the financial guarantee for decommissioning required by paragraph 3(1)(l) of the <i>General Nuclear Safety and Control Regulations</i>.</p> <ul style="list-style-type: none"> <li>• The cost of decommissioning such a facility for such a short lifespan seems like a large expense.</li> <li>• Description of the abandonment phase (e.g., in terms of monitoring activities) as required by section 11 of the <i>Prescribed Information for the Description of a Designated Project Regulations</i>.</li> </ul> <p>The AOO and other commenters seek further information about quantities and nature of waste resulting from the project. For the AOO the project description merely outlines that “low and intermediate level waste” will be managed, stored, transported, and processed. The AOO needs additional details that describe the amount, composition and concentrations of the waste generated by the MMR project as well as detailed descriptions of how the waste will be managed stored and transported.</p>	<p>and waste management plans) and also under the application for a Licence to Operate. The applicant is required to address the applicable waste management requirements throughout the lifecycle of the facility, including for decommissioning in the Preliminary Decommissioning Plan and eventually in the Detailed Decommissioning Plan.</p> <p>The <i>General Nuclear Safety and Control Regulations</i>, paragraph 3(1)(j) requires the name, quantity, form, origin and volume of any radioactive waste or hazardous waste that may result from the activity to be licensed, including waste that may be stored, managed, processed or disposed of at the site of the activity to be licensed, and the proposed method for managing and disposing of that waste. This requirement is part of the assessment of an application for a Licence to Construct and under a Licence to Operate. Additionally, a radioactive waste management program must contain, among other requirements, waste classification, characterization, segregation and minimization.</p> <p>Facility emissions and mitigation are required to be detailed in the draft EIS as outlined in section 9 (Effects assessment) of the EIS Guidelines. As well, environmental monitoring is a requirement for reactor facilities in Canada. Site control and monitoring continues until a reactor site is fully decommissioned and released from regulatory control.</p> <p><b>Waste transport</b> Regardless of the licensing stage, the applicant will be required to meet the transport requirements in accordance with the <i>Packaging and Transport of Nuclear Substances Regulations, 2015</i>. The regulations utilize a graded approach, based on the isotopic content and quantity of radioactive material, such that larger quantities of material is transported in a more robust package.</p> <p><b>Decommissioning</b> The applicant is required to provide a preliminary decommissioning plan (PDP) as part of the application for the Licence to Prepare Site. Further details regarding decommissioning alternatives will be discussed in the draft EIS. The applicant is expected to update the PDP at a minimum of every five years throughout the lifecycle of the reactor facility. The PDP will serve as the basis for developing the detailed decommissioning plan (DDP), which will be part of the application for a Licence to Decommission and as per the CNSC applicable regulatory requirements. With respect to <b>financial guarantees, project costs and funding</b>, please refer to CNSC staff’s response to PCF1 above.</p>
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<p>WMG2</p>	<p>Waste Generation and Management</p>	<p><a href="#">Anishinabek Nation</a></p>	<p>The Anishinabek Nation note in section 4.1 (Project Location) of the project description an area is described as follows: “A non-operational waste management area on the CRL property is located North-East from Site A. An existing CRL building (called Building 538), which is a series of tanks containing legacy liquid waste that are currently being emptied, is also located northeast from Site A.” The Anishinabek would like to know what is the legacy liquid waste at this site, and how is the liquid being disposed of?</p>	<p>This comment is not within the scope of this EA and application for a Licence to Prepare Site. The EIS will have to take into account the impacts of the project on the existing site (including the infrastructure in close proximity) and surrounding environment. While the legacy liquid waste is not directly within the scope of this project, please find the requested information below:</p> <p>Building 538 includes seven buried legacy tanks containing radioactive liquid waste generated from past activities for CNL’s fuel reprocessing program, decontamination of test loops in research reactors and regeneration of ion exchange resins used for fuel storage bays purification. The liquid in these tanks will be retrieved through a purpose built ion exchange system which will remove about 90% of the radioactivity. The processed liquid will be further processed at CRL’s waste treatment centre. CNL activities (currently under the planning stage) to address the stored liquid legacy waste at CRL are within the safety envelope defined by the Facility Authorization and licensing basis for CRL and are overseen by CNSC staff.</p>
<p>LTW1</p>	<p>Decommissioning and Long-Term Waste Management</p>	<p><a href="#">Métis Nation of Ontario</a> (MNO) <a href="#">Anishinabek Nation</a> <a href="#">Algonquins of Pikwakanagan First Nation</a> (AOPFN) <a href="#">Algonquins of Ontario</a> (AOO) <a href="#">Maritime Aboriginal Peoples Council</a> <a href="#">Phyllis Kessler</a> <a href="#">Old Fort Williams Cottagers’ Association</a> <a href="#">Saskatchewan Environmental Society</a> <a href="#">Bonnechere River Watershed Project</a> <a href="#">Pontiac Environment Protection</a> <a href="#">Concerned Citizens of Renfrew County and Area</a> (CCRCA)</p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>Many commenters raise concerns about the lack of information on long-term waste management, and the associated risks in terms of:</p> <ul style="list-style-type: none"> <li>• there are no facilities for long-term nuclear waste management and storage in Canada</li> <li>• enriched fuel has never been used in commercial reactors in Canada and will exacerbate the problem of disposal of radioactive waste</li> <li>• until there are facilities to permanently store nuclear waste there must be no more nuclear development in Canada</li> <li>• characterization and volumes of all low, intermediate and high-level waste is needed in the project description</li> <li>• there is no guarantee that the United States is willing and able to accept used fuel for the indefinite future</li> <li>• site monitoring after closure</li> <li>• site returning to a natural state with no radioactive waste left behind</li> <li>• a detailed decommissioning plan, which includes the management of irradiated graphite waste and concrete, should be part of a complete project description</li> </ul> <p>More specifically, many commenters question the proponent’s unsupported assumption that waste from the MMR project could be stored at different proposed long-term waste management facilities. Commenters have no confidence in the proponent’s assumption that waste could be accommodated at Ontario Power Generation’s (OPG) proposed deep geological repository (DGR) for low- and intermediate-level waste and at the Nuclear Waste Management Organization’s (NWMO) Adaptive Phased Management project (APM) for high-level waste (spent</p>	<p>With respect to <b>waste characterization and management</b> as well as <b>decommissioning</b>, please refer to CNSC staff’s response to WMG1 above.</p> <p>Regarding the long-term management of spent fuel, under Natural Resources Canada’s <i>Nuclear Fuel Waste Act</i> (NFWA), the owners of spent fuel are responsible for the development of long-term waste management approaches.</p> <p>The Nuclear Waste Management Organization of Canada (NWMO) was established under the NFWA and is responsible for implementing the Adaptive Phased Management (APM) approach, which has been accepted by the Government of Canada for the long-term management of Canada’s used nuclear fuel.</p> <p>NWMO has indicated that it will accommodate SMR waste. For more information see: <a href="https://www.nwmo.ca/en/More-information/You-Asked-Us/2018/02/12/11/57/Small-Modular-Reactors">https://www.nwmo.ca/en/More-information/You-Asked-Us/2018/02/12/11/57/Small-Modular-Reactors</a></p> <p>The applicant is the sole organization responsible for nuclear waste management, storage and disposal provisions associated with the MMR project, and will have to indicate how all waste streams will be managed in the draft EIS and licence application submissions. This includes making arrangements with NWMO for the long-term management of the used fuel. CNSC staff note the term deep geological repository (DGR) is a generic term that is not project specific and that there was no</p>

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		<a href="#">William Turner</a> <a href="#">David Prentice</a> <a href="#">Dave Taylor, University of Winnipeg</a> <a href="#">Kerrie Keith</a> <a href="#">Ingrid Style</a> <a href="#">George Neville</a> <a href="#">Kate Chung</a> <a href="#">Peter Storck</a> <a href="#">Environment North</a> <a href="#">Valerie Needham</a> <a href="#">Kenneth Birkett</a> <a href="#">Canadian Association of Physicians for the Environment</a> <a href="#">Northwatch</a> <a href="#">Jeff Brackett</a> <a href="#">Chris Cavan</a> <a href="#">Anne Lindsey</a> <a href="#">Georgina Bartos</a> <a href="#">Linda Murthy</a> <a href="#">Larry Wiwchar</a> <a href="#">Tony Reddin and Marion Copleston</a> <a href="#">Ralliement contre la pollution radioactive</a>	<p>fuel).</p> <p>Two commenters note the proponent’s uncertainty for decommissioning options in section 3.5.4 (Decommissioning) with in the project description. Northwatch notes that for the interim storage of used fuel a purpose-built storage cask can be used to contain the reactor vessel with the used fuel inside in a dry-storage configuration. The proponent states the casks will be stored either on site or off-site. Anne Lindsey notes that the proponent hints to possible in-situ decommissioning as the proponent states an alternative option to the casks is to leave the reactor vessel in place with the used fuel inside in-situ within the Citadel Building.</p> <p>Regarding section 3.5.4 (Decommissioning) of the project description Valerie Needham questions the statement: “all radioactive material above a specified level will be identified and removed”. What is that specified level? Why is this not explicit? Will this radioactive waste contribute to the radioactive waste stored in the Near Surface Disposal Facility that CNL has proposed for Chalk River?</p> <p>The AOPFN requests that the CNSC obtain the following information:</p> <ul style="list-style-type: none"> <li>Confirmation from CNL and the NWMO that their facilities have sufficient capacity and that they commit to managing any radioactive wastes that will be generated by the proposed MMR project. <b>[Request 18]</b></li> </ul>	<p>direct reference to OPG’s DGR facility in the proponent’s project description.</p> <p>If a potential arrangement between the proponent and CNL were to impact CNL’s existing licensing basis or CNL’s proposed Near Surface Disposal Facility, CNL would be required to notify the CNSC.</p>
T1	Transportation	<a href="#">Northwatch</a>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized.</i></p>	<p>With respect to the <b>completeness of the project description</b>, please refer to CNSC staff’s response to PPO1 above. With respect</p>

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		<p><a href="#">Arthur Beaubien</a></p> <p><a href="#">Anishinabek Nation</a></p> <p><a href="#">William Turner</a></p> <p><a href="#">Ralliement contre la pollution radioactive</a></p>	<p>The commenters argue the project description does not provide sufficient information on transporting:</p> <ul style="list-style-type: none"> <li>• used fuel from the facility to the final repository</li> <li>• enriched uranium</li> <li>• reactor modules</li> </ul>	<p>to <b>fuel transport</b> and <b>waste transport</b>, please refer to CNSC staff's responses to NP1 and WMG1 above, respectively.</p> <p>The proponent is expected to provide appropriate information on transportation in the detailed EIS and licence application submissions as outlined in the EIS Guidelines, REGDOC-1.1.1, <i>Site Evaluation and Site Preparation for New Reactor Facilities</i>, and other applicable regulatory documents.</p>
<p>UNT1</p>	<p>Uncertainty with New Technology</p>	<p><a href="#">Linda Murphy</a></p> <p><a href="#">George Neville</a></p> <p><a href="#">David Prentice</a></p> <p><a href="#">Denise Giroux</a></p> <p><a href="#">Sunil Nijhawan</a></p> <p><a href="#">Algonquins of Pikwakanagan First Nation</a> (AOPFN)</p> <p><a href="#">Evelyn Gigantes</a></p> <p><a href="#">William Turner</a></p> <p><a href="#">Chris Cavan</a></p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>The commenters raise concerns that the MMR project is first of its kind with unproven technology still under development.</p> <p>Evelyn Gigantes poses the following questions:</p> <ul style="list-style-type: none"> <li>• If there is a long international history of other attempts to develop (small) high-temperature, gas-cooled reactors, some of which also used TRISO fuel, why have almost all been abandoned?</li> <li>• What has been the operational experience with HTGRs?</li> <li>• What has been the particular experience with HTGRs using TRISO fuel?</li> <li>• Are HTGRs inherently “safer” than large-scale nuclear reactors?</li> </ul> <p>Sunil Nijhawan argues Canadian companies have no experience with helium gas cooled, graphite moderated, triple loop ceramic encapsulated enriched fuel nuclear reactor cores.</p> <p>The AOPFN is requesting the CNSC require the proponent to provide evidence and or case studies of fully integrated MMR facilities to demonstrate that similar technologies have been constructed and operated without resulting in adverse impacts to people and/or the environment. <b>[Request 7]</b></p> <p>William Turner points to discrepancies in section 3.1.1 (Project Summary) of the project description where the proponent states: “<i>The MMR technology ... is based largely on <b>proven designs</b> ... augmented with specific <b>novel safety features</b> ...</i>” William Turner notes proof of concept comes from several years of evidence gathered from the operation of a prototype. Further, any “novel safety feature” must be subjected to rigorous testing and verification before it receives approval for “general” use. William Turner is seeking evidence that the proponent has the technical design information to commence construction of the MMR project.</p>	<p>CNSC staff understand the level of concern on this topic. The proponent is required to provide information on these elements in their EIS, to determine the project's environmental effects through the lifespan of the project. As outlined in the EIS Guidelines, it is CNSC staff's expectation that the proponent consider input from the public and potentially affected Indigenous groups and organizations on the EIS. In addition, as part of the CNSC's EA process, members of the public and Indigenous groups and organizations will have the opportunity to comment on the draft EIS. CNSC staff encourage commenters to participate in all steps of the regulatory review process, including providing comments on the draft EIS.</p> <p>In addition, each stage of licensing for new Class I facilities have distinct regulatory requirements. The Licence to Prepare Site stage requires the applicant to demonstrate the site is suitable for the proposed facility over its lifecycle and that they will have appropriate safety and control measures in place for their proposed physical activities under that licence. In order to make the licensing conclusion on whether the site is suitable, the applicant must provide sufficient credible design information to bound the evaluation of environmental effects. Criteria outlining the appropriate level of design detail for an application for a Licence to Prepare Site are found in REGDOC-1.1.1, <i>Site Evaluation and Site Preparation for New Reactor Facilities</i>, appendix section F.1.3. The predicted environmental effects and other factors are identified within the EA and confirmed at the time of the Licence to Construct and throughout the facility's lifecycle. For further information on the licensing stages and the opportunities for the public and Indigenous groups and organizations to participate in the licensing process, please refer to REGDOC-3.5.1, <i>Licensing Process for Class I Nuclear Facilities and Uranium Mines and Mills</i>. The licensing process is designed to confirm that the risks are being addressed in all safety and control areas to ensure that the activities conducted using the facility are done so safely.</p> <p>With respect to <b>reactor design</b>, please refer to CNSC staff's response to NP1 above.</p>

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				<p><b>Operational experience</b> Review of operational experience from similar facilities is relevant information that is expected to be taken into account in a licence application. CNSC staff require the applicant to consider operational experience from similar facilities and HTGR generic safety issues, incorporating adequate safety measures to address accidents and malfunctions.</p> <p>Review of operational experience from similar facilities is relevant information that is expected to be taken into account in licence applications. Details regarding the modules and other design related considerations such as containment will be considered under the assessment of the Licence to Construct application.</p> <p>AOPFN's request has been noted by CNSC staff and shared with the proponent. In accordance with the CNSC's REGDOC-3.2.2, <i>Indigenous Engagement</i> and the EIS Guidelines, it is CNSC staff's expectation that the proponent review and address concerns and requests through ongoing engagement with all identified Indigenous groups and organizations, including the AOPFN, during the regulatory review process, including the development of the draft EIS.</p>
EP1	Energy Policy	<p><a href="#">Peter Storck</a></p> <p><a href="#">Kenneth Birkett</a></p> <p><a href="#">Arthur Beaubien</a></p> <p><a href="#">Denise Giroux</a></p> <p><a href="#">Kerrie Keith</a></p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have been summarized</i></p> <p>Commenters object to the governments' support to develop small modular reactors due to:</p> <ul style="list-style-type: none"> <li>• renewable energy options are available</li> <li>• there is no energy crisis</li> <li>• nuclear power has no impact on changing the climate crisis</li> </ul>	<p>Federal and provincial energy policies are not within the scope of this EA and licensing process. The CNSC's mandate is not to evaluate alternative energy sources or to make energy policy decisions, but to ensure, in accordance with the NSCA, the regulation of the development, production and use of nuclear energy to prevent unreasonable risk to the environment and to the health and safety of persons. Comments received on policy development for SMRs have been submitted to Natural Resources Canada as the responsible federal department.</p>
SMRD1	Future SMR Deployment	<p><a href="#">Maritime Aboriginal Peoples Council</a></p> <p><a href="#">Georgina Bartos</a></p> <p><a href="#">Environment North</a></p> <p><a href="#">Old Fort Williams Cottager's Association</a></p>	<p>A number of commenters raised questions about potential SMR deployment across Canada in particular in remote locations. Concerns included siting, operating and decommissioning SMRs across Canada and the associated costs.</p> <p>The Maritime Aboriginal Peoples Council expressed their disagreement with the "Call to Action SMR Roadmap" report by Natural Resources Canada, Ontario Power Generation, AECL, Bruce Power, and the Government of Ontario. The Council also expressed their concerns of Nova Scotia, Prince Edward Island and New Brunswick potential moving to SMRs for energy production.</p>	<p>Future SMR projects are not within the scope of this EA and application for a Licence to Prepare Site. With respect to <b>federal and provincial energy policies</b>, please refer to CNSC staff's response to EP1 above.</p> <p>SMR projects that are not subject to the <i>Impact Assessment Act</i> (IAA) will undergo a determination by CNSC staff on the type of environmental review required in accordance with the CNSC's mandate under the NSCA, to ensure the protection of the</p>

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		<p><a href="#">National Council of Women of Canada</a></p>	<p>Several comments have indicated a displeasure with a threshold-based approach to determining what projects will be subject to a federal environmental or impact assessment. Some concerns included that this approach would result in future SMR projects avoiding impact assessments and that by doing so any cumulative impacts of multiple projects in the same location would not be assessed.</p>	<p>environment and the health of persons. The <a href="#">CNSC Environmental Reviews webpage</a> describes the different types of applicable environmental reviews.</p> <p>The Government of Canada has indicated that impact assessments are to be conducted on projects identified as having the greatest potential for adverse environmental effects in areas of federal jurisdiction. The <i>Physical Activities Regulations</i> (or project list) was established by the Government of Canada that identifies the types of projects that may require an impact assessment. The proposed regulations were published for public consultation in May 2019. Further information on the establishment of the <i>Physical Activities Regulations</i>, as well as the Government's rationale and how public input was considered can be found on the <a href="#">Canada Gazette website</a>.</p>
<p>IAL1</p>	<p>Impact Assessment Legislation</p>	<p><a href="#">Georgina Bartos</a></p> <p><a href="#">Canadian Environmental Law Association (CELA)</a></p> <p><a href="#">Valerie Needham</a></p> <p><a href="#">Jeff Brackett</a></p> <p><a href="#">Francis Style</a></p> <p><a href="#">Kelly Clune</a></p> <p><a href="#">Canadian Association of Physicians for the Environment</a></p> <p><a href="#">Anne Lindsey</a></p> <p><a href="#">Old Fort Williams Cottager's Association</a></p> <p><a href="#">Saskatchewan Environmental Society</a></p> <p><a href="#">Algonquins of Pikwakanagan First Nation (AOPFN)</a></p> <p><a href="#">Anishinabek Nation</a></p> <p><a href="#">Ralliement contre la pollution radioactive</a></p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>A number of commenters have asked why the proposed MMR project by the proponent has fallen under the CEAA 2012 and not the current <i>Impact Assessment Act</i> (IAA). Similarly, the AOPFN <b>[Request 1]</b> asks for clarification from the CNSC, AECL, and CNL whether future SMR applications will be subject to CNSC-led EAs or follow the new IAA process.</p> <p>Furthermore, several comments indicated the need for a rigorous review and assessment process for the project, which should follow the requirements set out in the EIS Guidelines and include:</p> <ul style="list-style-type: none"> <li>• a well-defined scope of factors</li> <li>• a full review of environmental and social matters, including the technical demonstration that the proposed MMR is reliable, safe, clean and economically competitive, the consideration of any risks associated with uncertainties, and the conclusions reached</li> <li>• be subject to a public hearing with an independent panel of decision makers</li> <li>• adequate participant funding amounts, opportunities, and application time, especially early in the process so that interested parties have funding in place as the project progresses</li> </ul> <p>Saskatchewan Environmental Society's comments mentioned the assumption that the current comment period was for the development of guidelines for the EA and discussed how the organization was looking forward to the opportunity to review the draft EIS Guidelines once available.</p> <p>Lastly, the Anishinabek Nation have commented that because the new IAA is still so new, additional time to better understand implications of the new act, specific to the regulation of nuclear activities.</p>	<p>Future SMR projects are not within the scope of this EA and application for a Licence to Prepare Site.</p> <p>The IAA came into force on August 28, 2019. Nuclear projects whose EA commenced before this date - such as the MMR project, which commenced July 15, 2019 - remain subject to CEAA 2012 as indicated in the applicable IAA transitional provision (section 182): <i>"Any environmental assessment of a designated project by the Canadian Nuclear Safety Commission or the National Energy Board commenced under the 2012 Act, in respect of which a decision statement has not been issued under section 54 of the 2012 Act before the day on which this Act comes into force, is continued under the 2012 Act as if that Act had not been repealed."</i></p> <p>In May 2016, the CNSC published the <a href="#">Generic Guidelines for the Preparation of an Environmental Impact Statement pursuant to the Canadian Environmental Assessment Act, 2012</a>. The CNSC adopted the approach of issuing generic guidelines and does not develop project-specific guidelines. The purpose of generic EIS Guidelines is to inform proponents of the information requirements for the preparation of an EIS for a project that requires an EA under CEAA 2012. The EIS Guidelines provide general instruction on the preparation and information requirements that must be included in the EIS, in order to comply with the regulatory requirements of the CEAA 2012 and for CNSC staff to make its EA recommendation to the Commission.</p> <p>The CNSC's EA and licensing process is rigorous and requires the proponent to assess potential biophysical and indirect socio-economic environment effects. The next formal participation opportunity for the public and Indigenous groups and</p>

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				<p>organizations is to review and comment on the draft EIS and supporting documentation anticipated to commence in spring 2021. The last formal participation opportunity is the review of CNSC staff's EA Report and Commission member documentation for licensing and provide written and/or oral interventions for the public hearing where the Commission, the CNSC's independent decision-making body will take into consideration the EA and licensing recommendations.</p> <p>The CNSC's PFP enhances participation in the CNSC's regulatory processes. Funding for this proposed project will be offered in three phases. The second phase will be for the review of the draft EIS, while the third phase will be for the remainder of the regulatory process. The availability of the second phase of PFP will be announced within the next few months (around the same time as the Commission makes its decision on the scope of the EA). CNSC staff will continue to communicate with Indigenous groups and organizations in a timely manner about funding opportunities and will remain flexible on accepting applications and funding proposals. The CNSC is also open to funding additional engagement activities such as meetings with CNSC staff upon request.</p>
AM1	Accidents and Malfunctions	<p><a href="#">Bonnechere River Watershed Project</a></p> <p><a href="#">Canadian Association of Physicians for the Environment</a></p> <p><a href="#">Anne Lindsey</a></p> <p><a href="#">Arthur Beaubien</a></p> <p><a href="#">Evelyn Gigantes</a></p> <p><a href="#">Brad Blaney</a></p> <p><a href="#">Old Fort Williams Cottagers' Association</a></p> <p><a href="#">Concerned Citizens of Renfrew County and Area (CCRCA)</a></p> <p><a href="#">David Prentice</a></p> <p><a href="#">Algonquins of Pikwakanagan First</a></p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>A group of commenters have expressed concerns with this technology of reactor, stating that similar reactors that have been built and have had issues with accidents and malfunctions. Evelyn Gigantes mentioned a recent accident in Severodvinsk, Russia that should be reviewed for reference of this project. Commenters note the importance of reviewing the history of accidents and malfunctions of the proposed technology and similar SMRs. Specific concerns include:</p> <ul style="list-style-type: none"> <li>• graphite dust generation and accumulation</li> <li>• ingress of water or oil into the core</li> <li>• failures of TRISO fuel</li> <li>• Ingress of either air or water into the reactor core and subsequent radiation doses to nearby populations</li> <li>• accidents involving air or water ingress, fuel failures, graphite dust generation and graphite fires and resultant radiation doses to upper Ottawa Valley residents, must be included in the scope of the factors to be taken into account</li> </ul> <p>Commenters stress the importance of fully assessing all possible accident and malfunction scenarios, including transportation of fuel and waste.</p> <p>The AOPFN <b>[Request 5]</b> states that the CNSC should require the proponent to provide an initial assessment of potential failure modes and consequences of the proposed project, stating that the assessment should address the full life-cycle of the project. It</p>	<p>CNSC staff agree that potential accidents and malfunctions related to this new type of reactor facility must to be considered and evaluated as part of the EA and licensing review process. For further information on <b>accidents and malfunctions</b> considerations, please refer to CNSC staff's response to SW1 above.</p> <p>With respect to the use of <b>operational experience</b>, please refer to CNSC staff's response to UNT1 above.</p> <p>With respect to <b>reactor design</b> and <b>fuel transport</b>, please refer to CNSC staff's response to NP1 above. For information on <b>waste transport</b>, please refer to CNSC staff's response to WMG1 above.</p> <p>With respect to liabilities, should a licence be issued, the licensee will have to acquire appropriate nuclear liability coverage for the project consistent with the applicable requirements of the <i>Nuclear Liability and Compensation Act</i>.</p> <p>For the assessment of an application for a Licence to Prepare Site, CNSC reviews all new reactor facilities against REGDOC 1.1.1, <i>Site Evaluation and Site Preparation for New Reactor Facilities</i>, regardless of size. When applying a requirement to a specific situation, the CNSC uses risk informed decision making tools to judge whether the safety and control measures being</p>

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		<p><a href="#">Nation</a> (AOPFN)</p>	<p>should also assess both the nuclear and non-nuclear risks associated with the facility (releases of hydrogen gas, molten salt, transportation risks, etc.).</p> <p>There was also concern that the CNSC seemed to insinuate that smaller reactors would need less safety requirements and asked whether this proposed reactor would need a smaller exclusion zone.</p> <p>Arthur Beaubien asked how the proponent could assure complete protection of the environment and human health. They also asked how the proponent could properly compensate humanity and the environment for an accident or malfunction event equivalent to the Fukushima or Chernobyl events. The AOPFN's <b>[Request 6]</b> is similar in that they would like the CNSC to request the proponent provide documentation that proves the assertion that there are no scenarios where radioactivity could be released.</p> <p>Lastly, the CCRCA suggested the following specific references should be reviewed by the CNSC:</p> <ul style="list-style-type: none"> <li>• Englert, M., Frieß, F. and Ramana, M.V., 2017. Accident scenarios involving pebble bed high temperature reactors. <i>Science &amp; Global Security</i>, 25(1), pp. 42-55</li> <li>• Moormann, R., Kemp, R.S. and Li, J., 2018. Caution is needed in operating and managing the waste of new pebble-bed nuclear reactors. <i>Joule</i>, 2(10), pp. 1911-1914</li> </ul>	<p>implemented (such as the size of the exclusion zone) are appropriate given the potential hazards and consequences. An example of a non-nuclear application of such an approach would be the lack of seat belts for public transit (trains or buses), seat belts in cars/trucks, protective car seats for babies and toddlers in cars/trucks, and requiring harnesses and helmets for race car drivers.</p> <p>AOPFN's requests have been noted by the CNSC and shared with the proponent. In accordance with the CNSC's REGDOC-3.2.2, <i>Indigenous Engagement</i> and the EIS Guidelines, it is CNSC staff's expectation that the proponent review and address concerns and requests through ongoing engagement with all identified Indigenous groups and organizations, including the AOPFN, during the regulatory review process, including the development of the draft EIS.</p> <p>CNSC appreciates the references provided by CCRCA, and will review them.</p>
<p>PL1</p>	<p>Project Location</p>	<p><a href="#">Bonnechere River Watershed Project</a></p> <p><a href="#">Valerie Needham</a></p> <p><a href="#">Larry Wiwchar</a></p> <p><a href="#">Georgina Bartos</a></p> <p><a href="#">P. Tippet</a></p> <p><a href="#">National Council of Women of Canada</a></p> <p><a href="#">Canadian Association of Physicians for the Environment</a></p> <p><a href="#">Old Fort Williams Cottagers' Association</a></p> <p><a href="#">Evelyn Gigantes</a></p> <p><a href="#">Francis Style</a></p> <p><a href="#">Anishinabek Nation</a></p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>Many commenters have written about concerns with the proposed MMR project being sited at CRL in relation to potential accidents and malfunctions, due to:</p> <ul style="list-style-type: none"> <li>• proximity to the Ottawa River and is prone to flooding. (Commenters mention the proposed design is not impervious to rising waters and water infiltration)</li> <li>• site is too close to the TransCanada highway</li> <li>• site is right next to a Canadian army base</li> <li>• situated within an earthquake zone</li> <li>• site is already contaminated from the activities performed on-site</li> <li>• project would be too close to the research community of CRL</li> <li>• project would be so close to the proposed Near Surface Disposal Facility project, leading to overlapping safety concerns and the potential for interactions between both facilities (this should be specifically assessed by the EIS)</li> <li>• CNL has announced potential for a number of other SMRs, potentially at CRL, leading to greater safety concerns</li> <li>• Sheenboro is nearby, with residents as close as 3km away from the site</li> <li>• site is situated in an area with a large number of cottages and seasonal residents, which should not be underestimated</li> </ul> <p>Some commenters have expressed concerns over the project's location and the</p>	<p>Future SMR projects (e.g., northern Canada) are not within the scope of this EA and application for a Licence to Prepare Site. In addition, CNL's selection criteria and supporting studies to identify candidate sites is not within the CNSC's mandate.</p> <p>CNSC staff agree that the potential long-term radiological risks to the environment and human health of the proposed project need to be considered and evaluated. This is required as part of the EA. Information and demonstration of the long-term safety of the proposed project will need to be provided by the proponent in the EIS. These predictions are confirmed at the time of assessing the application for a Licence to Construct and throughout the facility's lifecycle.</p> <p>The EA is required to take into account the following factors as listed in subsection 19(1) of CEEA 2012:</p> <ol style="list-style-type: none"> <li>a) The environmental effects of the designated project, including the environmental effects of malfunctions or accidents that may occur in connection with the designated project and any cumulative environmental effects that are likely to result from the designated project in combination with other physical activities that have been or will be carried out.</li> <li>h) Any changes to the designated project that may be caused by the environment.</li> </ol>

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		<p><a href="#">Algonquins of Pikwakanagan First Nation</a> (AOPFN)</p> <p><a href="#">William Turner</a></p>	<p>considerations that go into siting of this type of project. The National Council of Women of Canada discussed that the CRL site would not be representative of more remote and northern locations that are being described as the target deployment areas for this type of SMR. They go on to mention that the following factors should be considered for these types of locations compared to the CRL site include:</p> <ul style="list-style-type: none"> <li>• siting transportation</li> <li>• community conditions</li> <li>• safety and security capacity</li> </ul> <p>Evelyn Gigantes noted that based on the project description, it was unclear whether CNL had plans to develop other SMRs at the CRL site, and wanted CNL to provide categorical clarity on the matter.</p> <p>Francis Style discussed concerns regarding CRL’s legacy waste and contamination issues on site and as well with the Ottawa River given its proximity.</p> <p>The Anishinabek Nation noted that the project description does not include adequate maps or descriptions of the potential sites. Commenters request more information regarding the relative size of these sites and what the minimum area is required to construct the facility.</p> <p>The AOPFN have included two requests related to the project’s location and site selection:</p> <ul style="list-style-type: none"> <li>• CNSC to require the Proponent to involve AOPFN in all site selection processes and alternatives assessment. <b>[Request 8]</b></li> <li>• CNSC to provide a rationale for not evaluating other sites to implement the project outside of the CRL Property. <b>[Request 9]</b></li> </ul> <p>William Turner is seeking information on the three areas CNL identified as suitable locations for siting the prototype reactor referenced in section 4.1 of the project description. The commenter is requesting the criteria CNL used to identify these candidate sites. In addition, the proponent identifies that further studies are required. What is the nature of those “additional supporting studies”? Since none of these studies occurred before this licence application, they must be part of the site preparation phase, the proponent’s current application. As such, the commenter claims these studies can not be undertaken until a licence is approved.</p>	<p>With respect to <b>accidents and malfunctions</b>, please refer to CNSC staff’s response to SW1 above.</p> <p><b>Cumulative effects</b> As outlined in section 9.4 (Cumulative effects) of the EIS Guidelines, the CNSC requires the proponent to identify and assess the project’s potential environmental effects, including cumulative effects, in the EIS. Cumulative effects are those environmental effects that are likely to result from the proposed project in combination with the environmental effects of other physical activities that have been or will be carried out. In particular, the Impact Assessment Agency of Canada’s (previously the Canadian Environmental Assessment Agency) Operational Policy Statement: <a href="#">Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012</a>, indicates the cumulative effects assessment must include future physical activities that are certain and should generally include physical activities that are reasonably foreseeable. In accordance with this Operational Policy Statement, CNSC require the proponent’s cumulative effects assessment to include existing physical activities and reasonably foreseeable and certain future physical activities.</p> <p><b>Site characterization</b> Appendix B of REGDOC 2.9.1, <i>Environmental Protection: Environmental Principles, Assessments and Protection Measures</i> provides specific criteria that are to be considered as part of the characterization of the baseline environment in the EIS. Similarly, section 3 of REGDOC-1.1.1, <i>Site Evaluation and Site Preparation for New Reactor Facilities</i> provides criteria for assessing the suitability of the site to host a reactor facility.</p> <p>Selection of the site is expected in the draft EIS and licensing documentation as well as detailed site information and maps.</p> <p>AOPFN’s requests have been noted by the CNSC and shared with the proponent. In accordance with the CNSC’s REGDOC-3.2.2, <i>Indigenous Engagement</i> and the EIS Guidelines, it is CNSC staff’s expectation that the proponent review and address concerns and requests through ongoing engagement with all identified Indigenous groups and organizations, including the AOPFN, during the regulatory review process, including the development of the draft EIS.</p> <p>There are requirements regarding the quality of environmental studies conducted in support of a licence application and EIS. Information supporting selection of the selected site must be</p>
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<p align="center">GHG1</p>	<p align="center">Sustainability and Greenhouse Gas Assessments</p>	<p align="center"> <a href="#">Canadian Environmental Law Association</a>  <a href="#">Environment North</a>  <a href="#">Northwatch</a>  <a href="#">Anne Lindsey</a>  <a href="#">Maritime Aboriginal Peoples Council</a>  <a href="#">Ralliement contre la pollution radioactive</a> </p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>Several different submissions have discussed the importance of conducting a sustainability assessment of the project and type of reactor technology if the intention of the project is to demonstrate functionality for broader deployment. These submissions note that the project description document currently lacks mention of sustainability as well as accompanying principles such as the precautionary principle or “polluter pays” principle.</p> <p>Furthermore, a number of commenters have also called for a full greenhouse gas (GHG) emissions assessment of the project, which should include all upstream emissions, even those attributable to uranium enrichment, fuel fabrication and module fabrication, as well as those generated outside of Canada. They also note that the proponent makes a number of assertions regarding low GHG emissions from the project and how this technology could help replace higher emitting technologies. However, the project description does not include an assessment proving such assertions and commenters have requested that proof be included.</p> <p>Some of these commenters also noted that there may be a discrepancy between the proponent’s comments on GHG emissions and the gas fired technology used in this reactor’s design, citing this as an additional reason for a fulsome GHG analysis.</p> <p>The Maritime Aboriginal Peoples Council asserts that an SMR has a large environmental footprint due to the large amount of greenhouse gas generated during construction of the facility, mining of uranium ore, processing of ore into fuel rods and storage of waste fuel.</p>	<p>provided in the licence application and EIS.</p> <p>Many facets of a sustainability assessment are matters of policy and are outside the mandate of the CNSC. For instance, the CNSC’s mandate is not to evaluate alternative energy sources or to make energy policy decisions, but to ensure, in accordance with the NSCA, the regulation of the development, production and use of nuclear energy to prevent unreasonable risk to the environment and to the health and safety of persons.</p> <p>Though a sustainability assessment is not a requirement under CEEA 2012 or the NSCA, the CNSC does consider elements of one. The precautionary principle and the ‘polluter pays’ principle are fundamental principles of the CNSC’s environmental protection framework, as outlined in section 2 of REGDOC-2.9.1, <i>Environmental Protection: Environmental Principles, Assessments and Protection Measures</i>.</p> <p>In addition, the proponent is required to conduct a greenhouse gas emission assessment as outlined in sections 2.1 and 5.1 of the EIS Guidelines and provide sufficient detail in the EIS. For further information on CNSC staff’s expectations in this area, please refer to the CNSC’s <a href="#">Fact Sheet</a> on greenhouse gas emission assessments for the Canadian nuclear fuel cycle.</p>
<p align="center">RSD1</p>	<p align="center">Reactor and Systems Design</p>	<p align="center"> <a href="#">George Neville</a>  <a href="#">Glenn Black</a>  <a href="#">Bonnechere River Watershed Project</a>  <a href="#">Northwatch</a>  <a href="#">Anne Lindsey</a>  <a href="#">Old Fort Williams Cottagers’ Association</a>  <a href="#">Canadian Coalition for Nuclear Responsibility</a>  <a href="#">Evelyn Gigantes</a> </p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>Many commenters have voiced apprehension towards the reactor and/or auxiliary systems designs. A recurring comment was that the project description suggests the proposed reactor poses less of a safety risk, requiring fewer operating staff and a smaller emergency exclusion zone but does not provide evidence for this claim. Other comments include:</p> <ul style="list-style-type: none"> <li>• Using helium as a primary coolant is unwise given its scarcity and cost</li> <li>• Molten salt as a heat exchanger will be corrosive and will lead to frequent shutdowns and retrofitting.</li> <li>• Enriched uranium reactors have inherently non-fail safe designs, will increase risk to the environment and the public, and are inefficient in terms of both nuclear and thermal energy production.</li> <li>• Claims regarding the fuel being all the containment.</li> <li>• SMR designs are still young and untested, they will need time to develop</li> <li>• More information on the assembly of off-site of modules should be given</li> </ul>	<p>Overall economic feasibility, addressing items such as cost of materials used in the project or economic considerations from frequency of required maintenance are outside the scope of CNSC’s mandate.</p> <p>With respect to <b>reactor design</b>, please refer to CNSC staff’s response to NP1 above. With respect to the use of <b>operational experience</b>, please refer to CNSC staff’s response to UNT1 above.</p> <p>The licensing process is designed to assess and confirm that the risks are being addressed and mitigating measures (if any) are identified and will be implemented in all safety and control areas to ensure that the activities conducted using the facility are done so safely.</p> <p>The CNSC does not prescribe the fuel sources for reactors – it is for the proponent to select and justify their selection through the safety case as part of the Licence to Construct application.</p>

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		<p><a href="#">David Winfield</a></p> <p><a href="#">William Turner</a></p> <p><a href="#">Saskatchewan Environmental Society</a></p> <p><a href="#">Anishinabek Nation</a></p> <p><a href="#">Ralliement contre la pollution radioactive</a></p>	<p>including what they are, design specifics, manufacturing process, operational experience, and track records, for both the manufacturer and their modules.</p> <ul style="list-style-type: none"> <li>• Pressurized containment should be considered to increase safety to nearby populations and the environment in the instance of internal releases.</li> <li>• No information proved on what temperature the reactor will operate at.</li> <li>• The proponent should include studies on the effect of high-temperature irradiation in the reactor core and consequent potential leakage of fission products as experienced with earlier TRISO fuel particles. The stability of graphite core framework under high-temperature irradiation should also be reviewed.</li> </ul> <p>Glenn Black also mentioned that all MEURs should use thorium based nuclear technology and that no MEUR should use EUR or similar as a fuel source.</p> <p>Similarly, a number of comments discussed concerns over the fuel type, including statements that the project description did not include adequate detail and information regarding the TRISO fuel and that the claims regarding TRISO technology were not supported with references. The proponent has also made a number of claims regarding the fuel that Evelyn Gigantes felt was misleading given a history of past forced shutdowns, early core replacements and early project shutdowns because operational costs were too high.</p> <p>Evelyn Gigantes also noted that the proponent has not described whether the fuel would move or be held stationary and whether the design would be prismatic or a pebble bed model. This has important safety implications as movement of the fuel creates uncertainty with the composition of the core.</p> <p>Furthermore, the commenter notes a section in the project description where the proponent seems to insinuate that ceramic fuel is just a novelty in the development of HTGRs. This commenter takes opposition with this insinuation. They also note that ceramic-coated fuel pellets have not always preserved operational integrity, and have been the source for contamination of graphite dust within reactors.</p> <p>The Anishinabek Nation have asked how the molten salt will be obtained, transported and disposed of. They have also asked what the legislative requirements are for the transport of molten salt to the site. Furthermore, they note the project description mentions that helium is circulated through the core using an electrically powered circulator but that it is unclear as to what happens if the power goes down and what backup system is in place for such an instance.</p>	<p>Additional details regarding the TRISO fuel are to be provided as part of the detailed submissions for the EIS and Licence to Prepare Site application. Sufficient details are required to generate credible information regarding accidents and malfunctions as outlined in REGDOC-1.1.1, <i>Site Evaluation and Site Preparation for New Reactor Facilities</i>.</p> <p>CNSC staff note that the fuel is a prismatic block and not a pebble bed as outlined in Exhibit 3-6 of the project description. With respect to <b>fuel fabrication</b>, please refer to CNSC staff's response to NP1 above.</p> <p>Regarding the transport of molten salt, it is typically not transported in a molten state but a solid granular form. Details regarding the composition of the salt will be addressed in the draft EIS. If the chosen salt is classified as a dangerous good, it would have to be shipped in accordance with the <i>Transportation of Dangerous Goods Regulations</i>. With respect to the <b>disposal of molten salt</b>, please refer to CNSC staff's responses to WGM1 and LTW1.</p> <p>Electrical supplies and back-up power will be considered in detail as part of the design review during the assessment of an application for a Licence to Construct under REGDOC-1.1.2, <i>Licence Application Guide: Licence to Construct a Nuclear Power Plant</i> and all supporting regulatory documents.</p>
RSD2	Reactor and Systems Design	<p><a href="#">William Turner</a></p>	<p>William Turner claims the proponent's licence application is premature due the lack of technical information and in light of CNL's <a href="#">Canadian Nuclear Research Initiative</a> (CNRI), launched on July 17, 2019. William Turner notes the CNRI purpose is "...to support collaborative small modular reactors (SMR) research projects with third party proponents in Canada..." By forming this new initiative, CNL acknowledges that there are knowledge gaps in areas fundamental to the overall development and commercialization of the SMR concept. Although CNL does not provide an end date for this research, it does acknowledge this research will continue over several years. Since</p>	<p>With respect to <b>reactor design</b>, please refer to CNSC staff's response to NP1 above.</p> <p>CNRI considerations, as an initiative by an organization that is not the proponent, are not within the scope of this EA and application for a Licence to Prepare Site. Detailed design information and the research and studies supporting the design including technical topics such as ones addressed by the CNRI are considered in detail</p>

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			<p>the proponent is proposing to construct the MMR at CRL, it must provide sufficient information on the CNRI's focus areas and the proponent's project timelines suggest it does not account for this research.</p> <p>Note: the CNRI's focus areas are: reactor physics, thermalhydraulics, SMR component degradation, safety, security and licensing, human factors, economics, transportation decommissioning and waste management, feasibility analysis, market analysis, and fuel development.</p> <p>William Turner also suggests the CNRI's focus areas should match the evaluation criteria used by the CNSC to evaluate any SMR licence application. Further the commenter does not agree that the public should have to wait for EIS for the results of "... the technical studies and findings of an EA as the EIS is not a design document and the scope of the EIS does not include discussion of the technical issues listed in CNRI.</p>	<p>during the assessment of an application for a Licence to Construct under REGDOC-1.1.2, <i>Licence Application Guide: Licence to Construct a Nuclear Power Plant</i> and all supporting regulatory documents.</p>
FD1	Facility Design	<p><a href="#">Valerie Needham</a></p> <p><a href="#">Northwatch</a></p> <p><a href="#">Old Fort Williams Cottagers' Association</a></p> <p><a href="#">Algonquins of Ontario (AOO)</a></p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>There were a number of commenters who highlighted facility design considerations, such as:</p> <ul style="list-style-type: none"> <li>• the proposed stack would be high, 100ft, but it is unclear what would exit the stack or why it would need to be so high</li> <li>• the proposal does not mention what the system of pipes containing the molten salt will be made out of to withstand the high temperatures over 20 years</li> <li>• it is unclear what the supporting infrastructure, referred to in the project description would be</li> <li>• the project description does not provide adequate information on the intended use of the process heat</li> </ul>	<p>With respect to <b>reactor design</b>, please refer to CNSC staff's response to NP1 above.</p> <p>It is CNSC staff's expectation that the considerations raised by the commenters regarding stack emissions, supporting infrastructure and purpose of the project (process heat versus electricity) will be provided in sufficient detail in the proponent's EIS and licence application submissions.</p> <p>In addition, CNSC staff require that information in the EIS and licensing submissions be provided in sufficient detail and/or with relevant references to substantiate any statements made. Sufficient information is required for CNSC staff to make scientifically defensible recommendations to inform evidence-based Commission decisions.</p>
CP1	Competency of the Proponent	<p><a href="#">Linda Murphy</a></p> <p><a href="#">Kate Chung</a></p> <p><a href="#">Northwatch</a></p> <p><a href="#">Anne Lindsey</a></p> <p><a href="#">Brad Blaney</a></p> <p><a href="#">Algonquins of Pikwakanagan First Nation (AOPFN)</a></p> <p><a href="#">Anishinabek Nation</a></p>	<p><i>Concerns on this topic were expressed by more than one commenter, and therefore, comments have either been summarized, or included as excerpts from commenter submissions</i></p> <p>Some commenters submitted concerns regarding the proponent's capability of developing such a project as the one proposed. A number of commenters questioned the capabilities of such new companies like the proponent or their partner Ultra Safe Nuclear Limited to carry out a project of this level. Furthermore, some commenters suggested that this type of project should be left for reputable companies known to have better practices in place.</p> <p>Northwatch noted the project description mentions an agreement between AECL and CNL but includes no details on the agreement. Similarly, they note that the project description mentions a number of different companies involved but that the roles and responsibilities of these companies for the project, and the relations between the companies, are unclear. They formally requested that a determination be made as to which of the partners share responsibility and liability of project proponent, or, the</p>	<p>CNL's Invitation for SMR Demonstration Projects process is not within the scope of this EA and application for a Licence to Prepare Site. With respect to <b>financial guarantees</b> and <b>socio-economic considerations</b>, please refer to CNSC staff's responses to PCF1 and PI5, respectively.</p> <p><b>Proponent of the project</b> GFP meets the definition of "proponent", as outlined in section 2 of CEEA 2012, which means the person, body, federal authority or government that proposes the project. GFP is proposing the project and therefore, it is appropriate that GFP is the proponent.</p> <p>Furthermore, issuance of a licence by the Commission relies on a demonstration that an applicant (a person or organization who has submitted an application for a licence under the NSCA) is qualified to carry on the licensed activity, and has/will be implementing adequate measures for the protection of the</p>

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			<p>proponent should be required to demonstrate the capability to proceed as the project proponent. Furthermore, they also requested that the financial arrangements between CNL, AECL, OPG, and the proponent be disclosed. Both of these items should be fulfilled prior to preparation of an EIS.</p> <p>The AOPFN requested that all parties involved should provide a response to why the project has been advanced to the EA stage prior to the proponent being selected as the preferred technology provider. They also asked in their <b>[Request 2]</b>, that an explanation be given as to why CNL is not serving as the proponent or co-proponent for the proposed project. Their <b>[Request 3]</b> asks that evidence be given to prove the proponent has the required expertise related to the construction and operation of nuclear facilities.</p> <p>Lastly, the Anishinabek Nation has requested clarity on whether the proponent proposal was the only company to advance to stage 3 of CNL's review process and whether other proponents are expected to be forthcoming.</p>	<p>environment and health and safety of persons. GFP, as the applicant, is responsible for demonstrating their qualification and the adequacy of measures; this includes its management system including its role in managing the project and external resources which includes contractors and sub-contractors. The applicant is required to prove that they are qualified for the scope of the licensed activities they are applying for. Qualification for construction and operation will be assessed during the review of the Licence to Construct and Licence to Operate applications respectively.</p> <p>Licences are issued to well-defined legal entities who will become the single licensee who is ultimately responsible for safety for the proposed project.</p> <p>With respect to the <b>description of roles and responsibilities</b>, please refer to CNSC staff's response to PCF1 above. In this case, roles, responsibilities and any arrangements that support the applicant in making their case that they meet the CNSC's requirement that they are qualified will be considered as part of the assessment of the licence application.</p> <p>With respect to liabilities, should a licence be issued, the licensee will have to acquire appropriate nuclear liability coverage for the project consistent with the applicable requirements of the <i>Nuclear Liability and Compensation Act</i>.</p> <p>AOPFN's requests has been noted by the CNSC and shared with the proponent. In accordance with the CNSC's REGDOC-3.2.2, <i>Indigenous Engagement</i> and the EIS Guidelines, it is CNSC staff's expectation that the proponent review and address concerns and requests through ongoing engagement with all identified Indigenous groups and organizations, including the AOPFN, during the regulatory review process, including the development of the draft EIS.</p>
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