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Tara Arko
Director, Technical Services, Nunavut Impact Review Board

July 14, 2023

Municipality of Clyde River's comments on the Draft Scope and Draft EIS Guidelines for the proposed Chidliak diamond mine (NIRB File No. 22MN025)

Ms. Arko,

The Municipality of Clyde River appreciates the opportunity to comment on the scope and guidelines for the proposed Chidliak diamond mine. The Municipality of Clyde River's primary concern with the Chidliak project is related to the possible use of a nuclear reactor to provide power to the mining operation.

This would be the first nuclear reactor operated in our territory. As you may be aware, there is a long history of Inuit concern with the use of nuclear technology in the Arctic. Since the 1970s Inuit organizations and activists have played leading roles in movements resisting uranium mines, nuclear weapons testing/deployment, and the use of experimental reactors in the Arctic. During recent debates over the proposed Kiggavik uranium mine, it was clear that many Inuit continue to have serious moral and political concerns with nuclear weapons and wastes.¹

The Municipality of Clyde River understands that small modular reactors are an experimental new technology, with several proposed prototypes in various stages of the regulatory and construction process.

Because of this long history of political resistance and public concern, and because of the experimental nature of the reactor being contemplated, the Municipality of Clyde Rive believes that all Nunavummiut should have the opportunity to participate in decisions regarding whether nuclear reactors should be permitted in our territory.

¹ Scottie, J. Bernauer, W. Hicks, J. (2022) *I Will Live for Both of Us: A History of Colonialism, Uranium Mining, and Inuit Resistance*. Winnipeg: University of Manitoba Press.

The Municipality of Clyde River is pleased to see that the potential nuclear reactor is included in the draft scope document. However, the Municipality is concerned that the draft guidelines may not fully capture our concerns with nuclear power.

In what follows, we outline our recommendations for revisions to the EIS guidelines, explain why our concerns be addressed by Nunavut's Inuit organizations and co-management institutions, and explain why the municipality believes that no nuclear reactors should be permitted in Nunavut until a regional assessment is conducted.

Recommended Additions to EIS Guidelines

The EIS Guidelines are cast in general terms, and do not refer to specific project components. Depending on how the guidelines are interpreted, they may not fully capture Clyde River's concerns with nuclear power. Given the long history of public concern with nuclear technology in the Arctic, the Municipality believes the proponent's EIS should:

- Provide additional information about the specific type of reactor being contemplated (manufacturer, model, size, etc.)
- Provide additional information about the projected electricity needs of the mining operation (including seasonal variations in energy needs)
- Describe potential emissions (both routine and accidental).
- Analyze the potential effects of emissions on all ecosystemic and socioeconomic factors listed in the scope document (pp. 2-4).² Explain how these potential effects will be monitored, managed, and/or mitigated.
- Describe how fuel will be transported and how the reactor will be refueled. Outline the steps that will be taken to avoid accidental emissions into the environment and exposure to workers and communities when transporting/handling nuclear fuel.
- Describe how nuclear waste (spent fuel, irradiated materials/equipment) will be stored, transported, and/or disposed of. Outline the steps that will be taken to avoid accidental emissions into the environment and exposure to workers and communities when storing, transporting, and disposing of nuclear waste.
- Describe how the proponent consulted with Inuit communities and organizations on the question of nuclear power.

² Nunavut Impact Review Board. (2023) *Draft Scope List for the Chidliak Diamond Mine Project Proposal*. NIRB File No. 22MN025.

Nunavut's co-management boards, not just the CNSC, need to consider our concerns

The Municipality of Clyde River is aware that some of these issues might be discussed during a Canadian Nuclear Safety Commission (CNSC) licensing process for the proposed reactor. However, the Municipality believes it would be inappropriate to leave these questions to the CNSC.

When Inuit signed the Nunavut Agreement, we agreed to surrender our Aboriginal title in exchange for specified rights, benefits, and political development. The agreement created co-management boards like the Nunavut Impact Review Board (NIRB), Nunavut Planning Commission (NPC), and Nunavut Water Board (NWB) to provide Inuit with better opportunities to participate in decisions about development in our territory. Allowing the use of nuclear reactors at mining projects, without a thorough assessment by Nunavut's Inuit organizations and co-management institutions – with opportunities for all Nunavummiut to meaningfully participate – would run contrary to the spirit of the Nunavut Agreement.

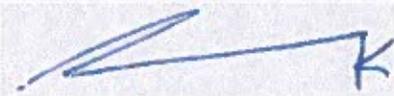
The Municipality does not believe that a CNSC licensing process is adequate to address our concerns or to facilitate Inuit participation. Compared to a NIRB review, a CNSC licensing process is narrow in scope. The focus is on safety, with significantly less attention on broader environmental, social, and economic impacts. NIRB reviews have significantly more provisions for the application of Inuit Qaujimajatuqangit (Inuit knowledge), and NIRB board and staff have significantly more experience working with Inuit Elders and knowledge-holders. CNSC licensing processes also have fewer opportunities for public engagement and Indigenous participation. Clyde River's experiences with the National Energy Board's permitting of seismic surveys shows that Canada's energy regulators are not well-suited to facilitate meaningful Inuit participation.

A Regional Assessment should be conducted before any nuclear reactors are permitted

A project-specific assessment will not fully address our concerns with the use of nuclear reactors at mines in Nunavut. All Nunavummiut should have the opportunity to participate in the decision regarding whether nuclear reactors should be permitted in our territory. These opportunities will not be possible in a project-specific review, which necessarily focuses on the perspectives of adjacent communities. In making these important decisions, we should also consider political and moral issues about uranium mining, nuclear weapons, and nuclear waste, which will not be captured in a project-specific NIRB review of a diamond mine.

The Municipality of Clyde River has written a letter to Nunavut's Inuit organizations and co-management boards, as well as the governments of Canada and Nunavut, requesting they collaborate on a regional assessment of the use of nuclear reactors at mining projects in Nunavut. This letter, which provides more details about the potential benefits of a regional assessment, is attached for your information.

Thank you again for the opportunity to provide comments on this important matter. The Municipality looks forward to participating in subsequent stages of the process.

A handwritten signature in blue ink, appearing to read 'Alan Cormack', with a stylized flourish at the end.

Alan Cormack
Mayor, Municipality of Clyde River

Attachments:

Municipality of Clyde River letter requesting a Regional Assessment of the possible use of nuclear reactors at mining projects in Nunavut (July 14, 2023)