

June 11, 2021

Angela Crandall
Clerk, Standing Committee on Environment and Sustainable Development
House of Commons
Ottawa, Ontario

Subject: Study on Freshwater in Canada

The Canadian Nuclear Association (CNA) is a non-profit organization established in 1960 to represent the nuclear industry in Canada and promote the development and growth of nuclear technologies for peaceful purposes. The CNA is the voice of the Canadian nuclear industry. We have nearly 100 members, representing over 70,000 Canadians employed directly or indirectly in exploring and mining uranium, generating electricity, advancing nuclear medicine, and promoting Canada's worldwide leadership in science and technology innovation.

Many of our members carry out projects on freshwater and are therefore have considerable experience and interest in addressing issues surrounding freshwater and are pleased to have an opportunity to provide input into this study.

Overarching Comments

The CNA notes that the Government of Canada recently consulted on a Discussion Paper: Toward the Creation of a Canada Water Agency and we would encourage the Committee to consider comments provided to that consultation. The CNA would like to highlight the following key points from our submission:

- The CNA notes that the proposed mandate is extremely broad, and we have concerns that unless the mandate is prioritized and focused there is significant potential for duplication of programs both within the federal family and with other jurisdictions. A new agency should avoid duplication with existing mandates at the federal, provincial, territorial, and municipal levels. This has the potential to create confusion, inefficiency and increase costs to both industry and government. CNA recommends that if a new agency is created, it be given a clear and defined mandate.
- There are already over 20 federal departments and agencies involved managing freshwater as well as other jurisdictions. Before creating a new agency, the federal government should identify and clarify existing roles within the federal family.



- Opportunities should be found to create efficiencies and reduce duplication across departments and agencies. This process would also be assisted by a “gap” analysis that looks at both federal and provincial processes to inform a clearer and more defined agency.

The CNA would strongly suggest that one of the most beneficial things the Committee could do is to look at ways to decrease duplication and inefficiencies so that Canada manages its freshwater in an efficient and effective manner that not only allows use of this valuable resource but also protects it for future generations.

Introductory information

Water is essential to nuclear power and most of our facilities are located on freshwater. For example, cooling water is an essential element of nuclear power generation and Canada’s existing nuclear generating fleet and nuclear processing facilities use once through cooling and return virtually all water to its original source. To that end, our members make the protection of freshwater and environmental stewardship a top priority. Our members are also active in protecting fish habitat, species at risk and water quality.

Interaction and collaboration with federal departments and agencies

The nuclear industry’s primary regulator is the Canadian Nuclear Safety Commission (CNSC). The CNSC has a mandate to protect human health and the environment (including freshwater). Other departments and agencies the nuclear industry engages with on freshwater include Fisheries and Oceans, Environment and Climate Change, Impact Assessment Agency, International Joint Commission, Transport Canada, Natural Resources Canada and department of Indigenous and Northern Affairs.

As stated earlier there are over 20 federal entities involved in freshwater, which can result in duplication and confusion, resulting in inefficiency and increased costs to both industry and government. A prime example of this is around the Fisheries Act where the nuclear industry can sometimes get conflicting advice from DFO, the CNSC and ECCC despite MOUs and provincial processes being in place.

Federal water legislation, policies and regulations

As mentioned above, the nuclear industry interacts with a variety of federal departments and agencies on freshwater policies and regulations.

With respect to gaps, it is our view that the main gaps lie with implementation of policies and regulations as well as duplication.

For example, under the amended Fisheries Act, codes of practice and standards are not in place and there is a lack of consistency among staff in interpreting the policies and regulations. Duplication not only occurs among federal entities but there is often extensive overlap with provincial requirements.

Recognizing that there are overlaps in jurisdiction, it would be helpful if federal departments and agencies could collaborate with provincial, municipal and Indigenous governments to find common objectives and avoid placing the private sector in a position of trying to resolve inconsistencies between governments.

Collection of information and data

The CNA has identified the collection of information and data and the management of that data as one area the federal government could make a significant contribution to. Significant amounts of freshwater data are collected by the federal government, provinces, territories, municipalities, Indigenous governments, and the industrial sector but insufficient effort has been made to ensure consistency, quality assurance, avoiding duplication, and ensuring access. A single data portal that could provide timely data access for all Canadians would be a valuable contribution that the federal government could undertake.

The CNA would like to thank the Standing Committee on Environment and Sustainable Development for the opportunity to provide our comments on its study on freshwater.

Sincerely,



Steve Coupland

Director of Regulatory and Environmental Affairs
Canadian Nuclear Association