



Canadian Small Modular Reactor (SMR) Roadmap
Feuille de route pour les petits réacteurs modulaires (PRM) au Canada

Indigenous and Public Engagement Working Group
Revised Recommendations

Submitted to the SMR Roadmap Steering Committee
August 17, 2018

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Indigenous and Public Engagement Working Group – Revised Recommendations August 17, 2018

Introduction

A series of Indigenous workshops were organized as part of the SMR Roadmap in 2018. Workshops were held in New Brunswick, Iqaluit and Alberta, with another set planned for Ontario in 2019. The intent of this initial dialogue is to gain knowledge and insights on current views of SMRs as well as identify appropriate approaches for future outreach.

A summary of the workshops held to date is included in the “What we Heard” section of the *SMR Roadmap Report*.

The Indigenous and Public Engagement Working Group recognizes that much was learned at these workshops and that the workshops are a good first step. However, much more work will be required to demonstrate meaningful, authentic and ongoing engagement about the potential of SMRs in Canada’s energy mix and, should the time come, to build awareness and support for an SMR project.

Our Working Group also acknowledges that these workshops included only a subset of Canada’s Indigenous leaders and organizations. We respectfully offer the following recommendations for inclusive and sustained future engagement on SMRs.

Recommendations

1. Listen and Learn (*before we act*)

- 1a) **The Working Group recommends that the Federal Government, as well as interested provincial and territorial governments and utilities, undertake regional qualitative and quantitative research to assess the views, attitudes and understanding of Canadians, including Canada’s Indigenous Peoples, of all potential energy options, including nuclear energy and SMRs.**
- 1b) **Additionally, as part of these research efforts, the Working Group recommends that the parties referenced in recommendation 1a work with the appropriate industry organizations to undertake comprehensive national and regional stakeholder mapping to ensure no Indigenous or public group is inadvertently excluded from engagement initiatives or opportunities.**

Note: This recommendation relates to engagement activities, and not project consultation requirements. Project proponents are required to undertake stakeholder mapping as a regulatory requirement of the Canadian Nuclear Safety Commission (CNSC), as per the CNSC’s regulatory guiding document RD/GD-99.3 Public Information and Disclosure.

The literature reviewed by the Working Group offers only a snapshot of opinions and attitudes at the time the research was conducted. There is limited research available specific to SMRs.

As with any risk-based communications initiative there will be a requirement for a more quantitative approach – we shouldn't guess or assume we know what Canadians think or how they want to be engaged.

Investing the time to undertake comprehensive research and message testing will help us understand Canadians' points of view and what matters to them, their concerns and possibly misconceptions. With this information we can design regionally targeted strategies, messages and activities that will resonate with a wide range and demographics of Canadians, including women and youth, and reflect their diverse perspectives and preferences.

2. Provide Context, Clarity and Consistency (as regionally appropriate)

2a) The Working Group recommends that the Federal Government, as well as interested provincial and territorial governments and the appropriate national and regional industry organizations, work together to increase energy literacy amongst all Canadians, including Canada's Indigenous Peoples. This includes raising awareness of energy issues related to climate change and the many energy options Canada has available to address these issues, including nuclear power and SMRs.

To understand a potential solution to a problem, there must first be recognition that there *is* a problem and a clear understanding of the problem itself. In this case, the "problem" is addressing the Canadian electricity sector's contribution to climate change; reducing greenhouse gas emissions (specifically in those regions of the country that rely on fossil fuels as primary energy sources). A further problem exists in de-carbonizing other energy intensive sectors, such as transportation.

A responsible, sustainable transition to clean energy in all regions of Canada will require a combination of renewable and non-renewable generation options.

Increasing the energy literacy of Canadians could be one of the Federal Government's initiatives flowing from the recently released *Generation Energy Council Report*. An energy literacy campaign or initiative, focused on sharing information broadly with all Canadians can provide a solid foundation of context and understanding upon which to begin specific engagement on the potential role of SMRs.

2b) The Working Group recommends that the nuclear industry, led by the Canadian Nuclear Association, work with appropriate partners to develop a research-informed communications and engagement strategy (including branding and messaging) that can bring awareness about nuclear energy's role in the clean energy conversation to all Canadians, and can be used across governments, utilities and industry.

2c) Furthermore, the Working Group recommends that culturally appropriate and translated materials for Indigenous communities be included in any future SMR communications strategy. We heard through the 2018 engagement workshops that traditional communications tools, like factsheets, may not be the best way to communicate with Indigenous audiences. Instead, consideration should be given to visual products, namely video.

How Canadian citizens are engaged by industry, government, utilities and others with a stake in SMRs will play a large role in determining if this technology finds a place in Canada's future energy mix.

What we say about SMRs, starting right now, must resonate with Canadians.

Communicators in any industry get comfortable with their own jargon, and the nuclear industry is no different. However, when we use terms such as *passive safety*, *below surface*, *containment*, *emergency planning zone*, *licence to abandon* and *host community* to describe our product, it's no wonder people can be confused and intimidated.

Clarity is also required in terminology used to describe generation options – renewables, clean, non-emitting, sustainable: what do these words mean to Canadians and how do they view nuclear power?

Undertaking this work will require a clear signal from governments on the inclusion of nuclear power and SMR technology in definitions related to clean, non-emitting energy sources.

In addition to being a potential source of reliable and clean electricity, SMRs are an innovative technology that can offer interesting, challenging and well-paying jobs and many other economic benefits. With this comes an opportunity to freshen the face of nuclear power – in language and how it's visually represented.

No doubt we have a tough, complex subject on which to engage and communicate! Building on our recommendation in point one, the Working Group recommends testing our words and imagery related to SMRs to ensure they set an accurate and positive tone.

3. Once a Foundation of Understanding has been Established, Start the Conversation

The Working Group recommends that the federal government and interested provincial and territorial governments, industry and utilities build on the engagement conducted as part of the SMR Roadmap and commit to an open-two-way dialogue with Indigenous Peoples and all Canadians about the potential role of SMRs in Canada's clean energy mix

Public Engagement

There are several credible models of public engagement. Models may differ slightly in suggested execution but have common foundational concepts. The recommendations in our Working Group report are based on the best practice methodology and core values of the International Association for Public Participation (IAP2).

Established in 1990, IAP2 is the preeminent international organization advancing the practice of public participation. IAP2 core values acknowledge the desire for people to participate in decisions that affect them, facilitate understanding and create the opportunity for better decision making.

Public engagement strategies based on the IAP2 model support an inclusive and continuous engagement process that involves a range of activities and opportunities for stakeholders to provide input in a decision-making process.

Ultimately, following the IAP2 model of engagement leads to better-informed decisions and strengthens stakeholder trust. By inviting public stakeholders to join us on the decision making journey, we learn from each other's different perspectives. Mutual understanding of these different perspectives can help us tailor our engagement activities and communications messages while helping us manage expectations and risks regarding public acceptance of SMRs.

While no approach or amount of engagement can offer a 100% guarantee of stakeholder support, an IAP2-centered approach to engagement and consultation can reduce the risk of endless conflicts that arise when issues are not understood, when solvable problems are not addressed early, or when people feel like they are not being heard and/or treated respectfully.

Indigenous Engagement

As holders of Aboriginal and Treaty rights, as recognized by section 35 of the *Constitution Act 1982*, Indigenous Peoples have the right to be consulted on major projects, including potential future SMR projects, in their traditional territories that may impact Aboriginal or Treaty rights.

The Working Group reiterates that the engagement to date as part of the SMR Roadmap has been part of an *early policy dialogue*, and should not be equated with meaningful *consultation* undertaken by a potential future SMR project proponent.

As governments, industry and utilities move forward on Indigenous engagement, and potentially project consultation, related to SMRs, the Working Group would like to raise the following considerations:

- The Truth and Reconciliation Commission Report and the United Nations Declaration on the Rights of Indigenous Peoples are an important foundational document for all actors to read and become familiar with *before* undertaking engagement.
- Each group may have different backgrounds, views, interests and drivers.
- Culturally appropriate materials and presentations, which includes ensuring communication is available in a group's language of choice (e.g., Inuktitut in Nunavut; Cree or Dene in Saskatchewan).
- It is essential to genuinely listen to Indigenous viewpoints, and be ready to recognize and acknowledge past grievances including, but not limited to, those related to uranium exploration and mining.
- Ensure the purpose of the engagement is clear – be willing to listen and be flexible (e.g. consider funding requests for capacity building).
- If possible, be open to exploring opportunities for business and ownership partnerships with Indigenous Peoples, communities and businesses to develop and deploy nuclear technologies.
- Indigenous engagement is not a one-time check list exercise. Authentic engagement can provide opportunities to strengthen mutually beneficial and respectful relationships with Indigenous Peoples by ensuring they have agency to make decisions about the energy future of their

communities, which may be informed through participation of government, industry, utilities and other stakeholders.

- The guidance and requirements in the Canadian Nuclear Safety Commission's (CNSC) REGDOC-3.2.2, *Aboriginal Engagement*, will apply to any applications related to specific SMR technologies.
- Any proponent for a SMR technology project would have to, at a minimum, meet the requirements of REGDOC-3.2.2 with respect to engaging Indigenous peoples throughout the assessment and/or licensing process. The existence and application of REGDOC-3.2.2 should be clearly communicated to any Indigenous peoples that are engaged with in relation to SMR technology generally.

The Canadian Nuclear Safety Commission (CNSC)

As Canada's independent nuclear regulator, the CNSC participated in this working group as an observer to better understand the discussions that will inform a proposed approach to engaging Indigenous Peoples on SMR technology. The CNSC is a technology neutral regulator and the CNSC's participation in this working group in no way indicates an endorsement or refutation of SMR technology in general or any SMR technology in particular.

Any licence application for SMR technology will need to meet the requirements of REGDOC-3.2.2. The CNSC's Indigenous engagement and public information requirements are intended to better understand issues and concerns related to CNSC-regulated activities and facilities and to encourage transparency and information sharing to align with the CNSC's role of ensuring the safe operation of nuclear activities in Canada.

Similarly, under CNSC REGDOC-3.2.1, *Public Information and Disclosure*, CNSC licensees and licence applicants are required to develop and implement a public information program that includes a disclosure protocol.

The primary goal of the public information program is to ensure that information related to the health, safety and security of persons and the environment, and other issues associated with the lifecycle of nuclear facilities are effectively communicated to the public and Indigenous peoples.

In cases where there has been a demonstration of public interest, a disclosure protocol is required to ensure ongoing, timely communication of information related to a licensed facility during the course of the licence period.

The existence and application of REGDOC-3.2.1 should be clearly communicated to the public and any Indigenous peoples that are communicated with in relation to SMR technology generally. Any licence application for SMR technology will need to meet the requirements of REGDOC-3.2.1.

4. Collaborate and Validate

- 4a) To support inclusive development and deployment of SMRs in Canada, the Working Group recommends:**
- I. That power utilities and future SMR project proponents explore options for business arrangements and partnerships with Indigenous groups; and,**
 - II. That the Federal Government, as well as provincial and territorial governments and utilities, support capacity building initiatives for Indigenous groups, civil society, women, and youth.**
- 4b) The Working Group recommends that the Federal Government, as well as interested provincial and territorial governments, utilities, and industry representatives explore collaboration opportunities with post-secondary institutions to develop education funding and specific education streams related to SMRs and Canada’s nuclear sector to build awareness and understanding amongst students of all ages and cultural backgrounds.**

Through the SMR Roadmap engagement workshops, we heard from Indigenous groups and Northerners that capacity building and partnerships are important to ensure meaningful participation in project consultations, and in sharing in the potential economic benefits that may come as a result of future project development.

We also heard that Indigenous groups and Northerners have technical questions about the feasibility of SMR technologies – how they work, their impact on the environment, and their suitability for specific communities. The Working Group therefore notes that support for Indigenous groups and Northerners to participate in SMR engagements, and to develop community-specific pre-feasibility and feasibility studies on SMRs, is an important next step coming out of the roadmap.

Our working group also noted the importance of including the voices of women, youth and Indigenous persons as we move forward on SMR development and deployment in Canada. Diversity is a strength of the nuclear industry and we should continue to foster it whenever possible. Capacity building programs and partnerships can be important aspects of ensuring that Canada’s future SMR industry includes a diverse range of viewpoints and opportunities.

- 4c) The Working Group recommends the Canadian Nuclear Association explore options for a trusted “third party” organization or association to publicly validate information about and the science behind nuclear power and SMRs.**

Our Working Group noted that, with rare exception, nuclear industry representatives often provide overly technical explanations, and, in their enthusiasm for their work, are sometimes viewed as biased toward nuclear energy technology.

There is definitely a role for the industry to advocate for their product. However, given the history of nuclear power globally, and the complexity of the topic, we recommend exploring the potential for a third-party organization to provide a trusted voice of factual information about SMR technology and how it compares to the many other low or zero emitting options Canada is considering.

This third party could also support ongoing conversations with Canadians to ensure sustained engagement, which will support trust building.