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Canada Water Agency
ec.water-eau.ec@canada.ca

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 the entire spectrum of the nuclear industry, from uranium mining and nuclear power utilities to engineering, service and manufacturing companies.

The CNA recognizes that freshwater is sacred to Indigenous people and is a precious and vital resource that must be preserved for future generations. To that end, environmental stewardship and environmental protection are responsibilities our members take very seriously and we are pleased to have the opportunity to comment on the Discussion Paper *Toward the Creation of a Canada Water Agency*.

Overarching Comments

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. 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.

As the paper points out, there are already over 20 federal departments and agencies involved in managing freshwater. 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 could inform a clearer and more defined agency.



The CNA appreciates that the Discussion Paper clearly states that a new agency will respect the jurisdictions of provincial, territorial, and Indigenous governments and will work collaboratively with them. The CNA strongly supports this approach. Although the nuclear industry is primarily regulated by the federal government, one of our great frustrations is the duplication of activities across jurisdictions and regulators. A new agency must avoid creating any additional duplication with other jurisdictions.

Section 3.2: Freshwater policy, coordination, and multilateral engagement

The CNA believes that current level of federal engagement is sufficient but as mentioned earlier, the first step would be to conduct a “gap” analysis to confirm that assessment. A new agency may have the opportunity to improve co-ordination within the federal family to create efficiencies, reduce duplication and improve regulatory certainty through a strategy to reconcile issues under various federal mandates.

Better co-ordination among various levels of government could lead to stronger and more consistent water management programs. A new agency would need to work closely with the existing Canadian Council of Ministers of Environment (CCME) Water Management Committee.

One area that a new agency could lead in is the creation of a national freshwater data warehouse that could be a valuable tool for national and international co-ordination and engagement.

Section 3.3: Freshwater prediction to inform climate change adaptation and disaster risk management

The impact of climate change on freshwater resources is an increasingly significant consideration for the government, industry, and the general public. Understanding the impacts of climate change is a critical consideration in developing water infrastructure projects. A new agency could play a vital role in collecting and coordinating data on the impacts of climate change on freshwater as well as supporting a collaborative approach to freshwater management strategies.

Section 3.4: Indigenous Peoples and freshwater management

Freshwater is often considered sacred and is at the centre of life for Indigenous people. The CNA believes that Canada's Indigenous peoples have a vital part to play in freshwater programs and policies, including adding Indigenous participation to the CCME Water Management Committee and in the proposed Canada Water Agency.

Section 3.6: Economic sectors and fresh water

Cooling water is an essential element of nuclear power generation and for the mining and processing of uranium. Our uranium mining industry uses minimal water and the use of which is closely monitored both provincially and federally already and has minimal impact on freshwater. Canada's existing nuclear generating fleet and nuclear processing facilities use once through cooling and returns virtually all water to its original source. Possible impacts from the discharge of cooling water have been well studied and are carefully managed. New nuclear plants such as SMRs are designed for minimal water usage. The CNA does not anticipate significant challenges with freshwater in the immediate future.

Perhaps the sector that faces the greatest challenge is the municipal sector, particularly in treating effluent for release to the environment. While industry is held to the highest standards (as it should be) and employs modern water treatment facilities, many municipal water treatment systems are older and overwhelmed by modern pressures. The result is often significant releases of untreated effluent to freshwater sources. These releases are often not well reported, and a new water agency could put a spotlight on one of the greatest risks to freshwater.

Section 3.8: Freshwater data

CNA has identified freshwater data management as one of the areas for which a new agency could make a significant contribution. Significant amounts of freshwater data are collected by the federal government, provinces, territories, municipalities, Indigenous government, 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 a new Canada Water Agency could undertake.

Recommendations:

The CNA would like to offer the following recommendations:

1. If a new agency is to be created, then it should be given a clear and defined mandate to avoid duplication, confusion, and inefficiency.
2. The first step in determining that mandate should be to identify and clarify existing mandates within the federal family followed by a “gap” analysis.
3. A new agency should avoid duplication with existing mandates at the provincial, territorial, and municipal levels. The new agency should work closely with the CCME Water Management Committee.
4. Data management is one area in which a new agency could make a valuable contribution.

The CNA would like to thank Environment and Climate Change Canada for the opportunity to provide our comments on a new Canada Water Agency and we look forward to participating in future consultations.

Sincerely,



Steve Coupland

Director of Regulatory and Environmental Affairs
Canadian Nuclear Association